
ADMINISTRATIVE DISCRETION AND JUDICIAL OVERSIGHT: A CASE STUDY OF AIR INDIA VS. NARGESH MIRZA

Pratyasha Chowdhury, Symbiosis Law School, Hyderabad

Tanisha Soni, Symbiosis Law School Hyderabad

INTRODUCTION

Administrative prudence is the elasticity required for public authorities to carry out public policies and regulations efficiently, given the framework of legislation. However, such prudence, in the absence of the adequate constitutional constraints, may result in some arbitrary and discriminatory practices contrary to fundamental rights. The tension between the administrative efficiency and constitutional compliance is the cornerstone of modern administrative law jurisprudence and administrative law requires careful judicial supervision to ensure that discretionary powers are exercised within the boundaries imposed by the Constitution.

The case of *Air India v. Nargesh Mirza (1981)*¹ which provided a seminal example of this tension where there was a constitutional challenge to discriminatory employment regulations which imposed differential service conditions on male and female cabin crew members. The Supreme Court's judgment in this given case has stated some important precedents on the limits of administrative prudence, the operation of such principles of equality under “Articles 14², 15³, and 16⁴” of the Constitution, and the role of judiciary in safeguarding fundamental rights against excesses by the administrative authorities.

The given case study is not just a study of employment discrimination, but it is also a study of the most basic constitutional discriminatory issues concerning how administrative authorities are required to exercise their discretionary powers within the ambit of equality, reasonableness, and non-arbitrariness that the Constitution has set a base for. The sustained importance of the judgment lies in its base of principles concerning administrative discretion and its contribution to the unfolding jurisprudence on gender equality in public employment is of vital importance.

¹ *Air India v. Nargesh Meerza*, (1981) 4 SCC 335.

² INDIA CONSTI, Art. 14.

³ INDIA CONSTI, Art. 15.

⁴ INDIA CONSTI, Art. 16.

BACKGROUND

Historical Context and Administrative Framework

As India's public carrier and Air India's initial establishment, the company, like many others, had a framework of rules and policies which created workplace inequalities among its employees, including members of the cabin crew. Cabin crew's different gendered roles and associated regulations and rules within the 'Service Regulations of Air India Employees', and the socially accepted and dominant ideology of woman's place within a workplace in the 1970s and 80s, made Air India and its crew members cabin employees' lives miserable.

Regulation 46, among others, maintained the civil marriage contract as a dominant feature of social relations and as an institution as marriage does retain its social functions, Air Hostesses (female cabin crew members of the crew) did stay under a regime of indentured servitude, wherein signified age and active duty terms of 5 and 4 years closer to active provision of services—active members age 21, and whilst attached to such marriage does remain compulsory—closer within. In contradiction, Air Flight Pursers (male cabin crew) had retirement at age 58 with no such underlying restrictions associated with marriage or parenthood. These rules were based on the mere base of administrative understandings of what women's main duties should be at home and also on the belief that women could not effectively balance career and their family obligations.

Regulation 47 stated these discriminatory provisions by vesting discretionary power within the Managing Director to extend the service of Air Hostesses beyond their normal retirement provisions. This discretion operated in the absence of clear guidelines, standards, or procedural safeguards, and opened the door to arbitrary and inconsistent decision-making. The regulations effectively set a base for gender-based discrimination and at the same time afforded to set a ticking time limit on the administrative powers on the career path of women working in Air India.

Constitutional and Legal Framework

The constitutional challenge against these regulations arose within the larger section of the development of equality jurisprudence in India. “Articles 14, 15, and 16” of the Constitution were the basis for challenging discriminatory practices in administration.

Article 14⁵: Stating Equality before law and equal protection of laws against arbitrary action of state and require reasonableness in administrative decision making

Article 15 (1)⁶ that specifically forbids discrimination on the grounds of sex and creates a constitutional imperative for gender-neutral government policies. Article 16⁷ which specifies and guarantees equal opportunity in public employment and prohibits employment discrimination on the basis of sex in its clause (2). These provisions in the Constitution established a whole package to govern the discretionary powers of administrative authorities in such a way that they do not take into consideration the principles of equality and non-discrimination.

The regulatory framework also overstepped with the new administrative law principles about the limits of discretionary power. The constitutional bar on arbitrary state action, which has been formed through landmark cases such as *E.P. Royappa v. State of Tamil Nadu (1974)*⁸ this case laid down that administrative discretion must work within the boundaries of reasonableness and rationality and not beyond their ambit. The *Maneka Gandhi v. Union of India (1978)*⁹ judgment further strengthened the procedural fairness requirements and the interlinkage of “Articles 14, 19¹⁰ and 21¹¹”.

⁵ *Supra* note 2.

⁶ *Supra* note 3.

⁷ *Supra* note 4.

⁸ *E.P. Royappa v. State of T.N.*, (1974) 4 SCC 3.

⁹ *Maneka Gandhi v. Union of India*, (1978) 1 SCC 248.

¹⁰ INDIA CONSTI, Art. 19.

¹¹ INDIA CONSTI, Art. 21.

PROBLEM STATEMENT

The central problem that can has to be addressed in this case study concerns the fundamental tension in administrative law between providing public authorities with sufficient discretionary flexibility to carry out policy effectively while ensuring that such discretionary flexibility occurs within constitutional constraints and within the given ambit and power and is designed to protect individual rights and prevent arbitrary action by government. This tension is especially sensitive in cases where administrative discretion comes into contact with basic human rights guaranteed under the Constitution, where the courts must balance different interests of administrative efficiency and constitutional rights given in book .

The specific issues of constitutional and administrative law involved in “Air India v. Nargesh Mirza”¹² include:

First, whether it is possible for administrative authorities to draw up employment classifications on the basis of their gender alone, and if so, what are the constitutional justification for such classifications under Articles 14, 15 and 16. The case required consideration of the reasonable classification and justification doctrine and how it is applied to gender-based employment policies in public sector undertakings.

Second, the ambit to which administrative discretion may be placed in the hands of individual officials without adequate procedural safeguards or substantive guides, especially when the discretion affects fundamental rights and career opportunities. This issue was a direct response to the constitutional bar on unanalyzed and arbitrary administrative power.

Third, the proper method of judicial review for administrative regulations that involve in multiple treatment based on their gender, placing those people in the courts to decide whether such policies are employed to serve legitimate administrative goals or are they there due to societal prejudices and stereotypes. This involved the application of developing constitutional jurisprudence on gender equality to administrative law contexts.

Fourth, the expansive issue of how the principles of administrative law such as reasonableness, fraction and natural justice apply to employment regulations which systematically disadvantage particular groups, especially women working in the public sector employment.

¹² *Supra* note 1.

This issues included the intersection between administrative law and constitutional equality principles and emerging gender equality jurisprudence.

METHODOLOGY

The present case study combines a detailed doctrinal analysis that situates and explores 'Air India v. Nargesh Mirza'¹³ within the larger context of Indian administrative law and constitutional jurisprudence. The present methodology combines a few aspects of analysis in providing a detailed insight into the importance of the case and its implications within the principles of administrative law.

Primary Source Analysis

The research methodology revolves around the detailed study of the judgment in "Air India v. Nargesh Mirza" by the Supreme Court, scrutiny of the Court's thinking, applications of constitutional principles and expressions of administrative law doctrines. All these studies include the Court's approach to Articles 14, 15 and 16, applications of the principle of equality and the Court's approach to administrative branch's discretion. The approach also comprises applicable statute sections such as: Air India Employees Service Regulations, articles of the Constitution of India to, understand the legal framework under which the case arose. This textual analysis provides background for the way in which specific administrative powers are at issue, and the constitutional standards the Court used to draw its end decisions

Comparative Analysis of Jurisprudence

As India's public carrier and Air India's initial establishment, the company, like many others, had a framework of rules and policies which created workplace inequalities among its employees, including members of the cabin crew. Cabin crew's different gendered roles and associated regulations and rules within the 'Service Regulations of Air India Employees', and the socially accepted and dominant ideology of woman's place within a workplace in the 1970s and 80s, made Air India and its crew members cabin employees' lives miserable.

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Doctrinal and Framework Analysis

The methodology is the systematic study of administrative law doctrine applicable to the case, i.e., the "Wednesbury" test of reasonableness, proportionality doctrine and natural justice requirements. The doctrinal exegesis provides for the application of those tests in Nargesh Mirza and their development thereafter in Indian administrative law.

Another dimension on which research has been conducted is the convergence between the administrative law principles and the constitutional equality-based jurisprudence and the balance exercised by courts between administrative autonomy and fundamental right protection. The research methodology adopted for that purpose evaluates a body of literature that includes diverse contributions. The research paradigm allows us to view the whole court reasoning and how it has a bearing upon administrative governance.

Critical Methodology of Evaluation

The research is founded on the critical consideration of the Court's arguments in the case of Nargesh Mirza, and on the strengths and shortcomings of the case's judicial approach. This involves a regard for the internal coherence of the Court's reasonably-made analysis, adequacy of its interpretative approach to the Constitution, and practical applicability of its decisions to administrative practice matters. The critical methodology also takes into account the importance of the case at hand to the general administrative law and constitutional jurisprudence, taking into consideration whether the Court's approach to the case was a competent balancing act between the conflicting constitutional and administrative priorities or not. The analysis provides a base on the contemporary relevance of the case and its implications on the formulation of the administrative law in the modern day.

OBJECTIVES

This case study examines to accomplish various inter-related goals which ensures to get an in- depth understanding about administrative prudence and judicial control through a detailed

case study and re-examination of “Air India v. Nargesh Mirza”¹⁴ and its broader implications in Indian administrative law jurisprudence.

Primary Analytical Objectives

Firstly, to examine the constitutional interpretation and application of Art. 14, 15 and 16 by the Supreme Court as applied to administrative regulations that established gender based employment categories. The analysis is interested in how the Court struck a balance between constitutional principles of equality and the acknowledgement of administrative power to develop employment regulations and administrative structures.

Second, to evaluate how the Court has dealt with judicial review of administrative discretion, particularly how it has dealt with unanalyzed discretionary power and how the standards of limitations on administrative power have evolved. This purpose involves analysis of how the Court applies the new administrative law principles in preventing the abuse of power by the government.

Third, to assess the effectiveness of the rationale of the Court in hearing cases on constitutional matters related to discriminatory employment practices without partially overruling choices in administrative expertise and organizational free will. This involves the assessment of whether the methodology embraced by Court was a proper balance between judicial supervision and administrative flexibility.

Jurisprudential Development Objectives

Fourth, to consider how the case contributed to the development of the principles of administrative law in India, and specifically in the context of the demands of reasonableness, proportionality analysis, procedural fairness demands. This goal quantifies the contribution by Nargesh Mirza in the development of norms of the principles of judicial review and administrative law doctrine.

Fifth, to analyse the impact on the case on the jurisprudence of gender equality, and its function in the creation of the constitutional standards of adjudication the trade of employment

¹⁴ Air India v. Nergesh Meerza, (1981) 4 SCC 335.

discrimination against women in the public sector. This includes looking at the ways in which the case had an impact on later challenges to discriminatory administrative practices and policies.

Sixth, in order to read the longer-range implications of the Court's approach for understanding the relation between administrative discretion and constitutional rights, given the way in which the case contributes to the understanding of the limitations of governmental power in democratic government. This objective includes determination of the case's impact on constitutional interpretation and administrative accountability.

Modern-day Relevance Objectives

Seventh, to examine the abiding relevance of the principles laid down in the case of Nargesh Mirza to the current administrative law and constitutional jurisprudence, to analyse the applicability of these principles to contemporary world challenges of governance. This include assessment of the case's impact on modern methods of “administrative discretion” and “judicial oversight.”

Eighth, to study the lessons of the case for the design of administrative procedures and policies that meet Constitutional requirements and remain effective. This objective is concerned with practical implications of the Court's reasoning for administrative practice and policy development.

Ninth, to contribute to academic understanding of the development of Indian administrative law and its peculiarities in the context of comparative administrative law systems; This objective includes assessment of the differences between Indian approaches to administrative discretion and judicial oversight and international practices and standards.

ANALYSIS

Constitutional Framework and Administrative Authority

The analysis done by Supreme Court in *Air India v. Nargesh Mirza*¹⁵ required a sophisticated contact with the constitutional system regarding equality rights and political power. The main question at the Court was about the limitation of Article 14, 15 and 16 to the administrative discretion in the operational sphere of employment and the need of the organizations to keep flexibility within the enterprises in the sphere of the public sector.

The manner in which “Article 14¹⁶” was dealt with by the Court was the result of the changing jurisprudence introduced “*E.P. Royappa v. State of Tamil Nadu (1974)*¹⁷”, which has significantly extended its account of equality beyond the stress on formal tests of classification and has done by placing substantive review of arbitrariness in state action. The revolutionary principle, of Justice Bhagwati, which was arbitrariness in state action, being an opposite extreme of equality, provided important grounds of assaulting the state in administrative regulations that lacked rationality.

The principles as applied in the case of the regulations of the *Air India* involved, meant that the Court needed to determine whether the groupings based on gender were done to achieve legitimate administrative purposes or as a result of institutional favoritisms. The discussion conducted by the Court revealed that the principles of constitutional equality were difficult to apply in the administrative context where organizational efficiency and need of operations had to be considered alongside the safeguard of the individual rights. The overlaps between Article 15 and 16 brought about some additional analysis difficulty, since the provisions address in particular the employment situations involving sex-based discrimination. The forbidding of discrimination on grounds only of sex in “Article 15(1)¹⁸” which had established an inference that limited governmental policy based on gender and the specific implication of “Article 16(2)¹⁹” to government employment which led to increased scrutiny on the issue of discriminatory employment practices.

¹⁵ *Supra* note 1.

¹⁶ INDIA CONSTI, Art. 14.

¹⁷ *E.P. Royappa v. State of T.N.*, (1974) 4 SCC 3.

¹⁸ INDIA CONSTI, Art. 15(1).

¹⁹ INDIA CONSTI, Art. 16(2).

Administrative Discretion and Constitutional Constraints

A major step in administrative law jurisprudence in relation to the constitutional restrictions of delegated power was the reaction of the Court to the so called “Regulation 47”, which gave the Managing Director unregulated discretionary power in relation to service extensions. By striking down this provision the Court struck down the fundamental premise that administrative discretion could not be unlimited and untrammelled by procedural protection and substantive standards. The interpretation of the constitution utilized settled precedents to an extent against excessive delegation of the legislative power, but applied the principles to executive administrative situations. The Court understood that administrative efficacy needs some degree of discretion in flexible decision-making but that discretion has to operate within the framework of the Constitution to ensure that the government does not use arbitrary decision-making authority and to guarantee uniformity in the application of government administrative policy. It was the logic of the Court of such a kind that at the same time, expressed an advanced insight into the interrelation between the principle of procedural fairness and the principles of substantive rights in the Constitution.

The reasoning of this Court revealed a strong hold of the relationship between fair procedures and fundamental rights in the Constitution. It highlighted the fact that excess freedom in the role of Managing Director may result in unfair and unequal decisions or neglecting proper procedures and treatment. This discussion helped to establish a more clear structure in the administrative law by answering a tough question, although an administrative decision is made after the goals of the law, is it supposed to go through the right steps and rules to prevent some unfair measures?

This question was resolved by the court in the form of a compromise between belief in administrative experience and compliance with the demands of the Constitution in making logical and fair decisions.

Judicial Review Standards and Reasonableness Analysis

In the case of *Air India v. Nargesh Mirza*²⁰, the test of fairness to check whether the rules are reasonable or not was imposed by the court in this case. This shows how the *Wednesbury* principle of reasonableness originated from English law, and this was the starting point of influence on Indian administrative law. The Indian court's already shaped it according to India's

²⁰ *Air India v. Nargesh Meerza*, (1981) 4 SCC 335.

own constitutional values at the same time, and stated the main question before the court was whether the regulations were so irrational that they could not be right under the constitution.

The compulsory termination after the pregnancy, this rule became the example where the court struck it down and called it not only a callous and cruel act but an openly insulting Indian motherhood. The court used a strong interpretation and made it clear that reasonableness will not be hidden with any principle, and checked the actual effect of such policies on women's lives.

The idea of balance was also introduced by the court, and it stated that it was not fully developed in Indian law at that time. Asked whether the restrictions made by the employer were really necessary or whether they were much harsher than required. This case shows how the pregnancy rules were stricter, and without proper justification, they imposed on women. This showed an early attempt to apply balance, which later became an important part of Indian administrative law.

The restrictions on marriage are a very complicated rule, with the nature of applying fairness in service rules. The rule on air hostesses could not marry within the first four years of service, reasoning that the airline had invested in training and needed commitment from its employees. This rule was defended. This part of the judgment has been criticised because the court didn't question the accepting the gender-based assumptions behind such rules, the court also missed the chance of changing the society's mindset that linked women's marital status to their professional efficiency.

Gender Equality Jurisprudence and Administrative Practice

This case plays a very important role in the growth of gender equality law in India. Basically, this case went beyond the issue of individual employment discrimination and also laid down the broader principles on how the government authorities deal with gender issues in the policies, which always keep in mind the constitution. In this case, the court shows whether restrictions placed on women were based on administrative needs or were simply a result of an old social mindset. In this case, the most significant aspect is that the court decided to strike down the rule on compulsory termination of employment after pregnancy. The large step was taken, which recognised reproductive independence as a part of constitutional equality.

The Court says that forcing women to choose between motherhood and a career goes against basic constitutional values, and this declaration is an important example against workplace policies that punish women for their biological changes or family tasks. The court also accepted a distinct team for Air hostesses and air flights about certain age-based limits, which showed the gaps in its approach. Treating them as two distinct classes with different service conditions, the court avoided the questions on gender-based assumptions behind this division. And this part of the judgment is challenged because of society's mindset. The influence of all this, the gender equality law has miscellaneous results, and on one hand, it created a liberal standard, and on the other hand, it allowed traditional gender role-based divisions to continue.

The developing journey of constitutional explanation on gender issues and the ongoing effort to remove systemic judgment.

Natural Justice and Procedural Fairness

The principle of Natural Justice was used in this case by the court, the practical justice and this principle is typically seen in landmark cases like *Maneka Gandhi v. Union of India*²¹. The court's main focus is on the rearrangement and proper rules so that administrative will would not turn into an arbitrary use of power. This thing displays a wider trend in Indian law toward making administrative actions more accountable and transparent. The extension of natural justice into the part of employment rules, the court ruled that managerial authorities must follow fair actions when making decisions that affect a person's rights and career chances. Apart from this, the shift from knocking natural justice only in judicial or quasi-judicial matters also includes administrative matters in policy making and requests that involve constitutional rights. The court rejected the idea of limitless voting power, viewing the view that people should have clear, clear rules about how administrative decisions are made, and this method pushed for greater transparency and accountability in governance and laid down the base for fair administrative performance.

Related Cases and Jurisprudential Development

The rules made in “*Air India v. Nargesh Mirza*²²” even served to assist numerous other cases on the degree of power an official has and when he or she is supposed to be restricted as well

²¹ *Maneka Gandhi v. Union of India*, (1978) 1 SCC 248.

²² *Air India v. Nergesh Meerza*, (1981) 4 SCC 335.

as to defend the constitutional rights of the people. The manner in which the court described the case was applicable in other contexts such as being treated unfairly at work or how the government rules can be enforced. This demonstrates the significance of the case on the society as it pertains to the administrative law.

“E.P. Royappa v. State of Tamil Nadu (1974)²³”

The fundamental conception of what arbitrariness is was provided by the High Court in this case and later applied in Nargesh Mirza. It stated the government activities in relation to being reasonable and fair as Article 14²⁴ does. The case rule that an arbitrariness by the government is the rival of equality provided a means of challenging unfair rules by officials which were not based on good reasons.

“Maneka Gandhi v. Union of India²⁵”

In this case the court altered the manner in which the courts view fairness and constitutional rights. The court rules that any process created by law is supposed to be fair, just and reasonable. This provided a good platform upon which to examine whether the decisions made by the government were taken in the right manner.

“C.B. Muthamma v. Union of India (1979)²⁶”

This case became important when looking at unfair rules for women in jobs, like the case in Air India. It revoked the regulation that civil service officials had to be given permission to marry and led by example to oppose these types of unfair regulations in hiring.

“Vishaka v. State of Rajasthan (1997)²⁷”

This case showed that ideas of gender equality increased due to rules in Nargesh Mirza case. The principles established to prevent sexual harassment in workplaces provided an excellent example of using the constitution to further protect women against discrimination.

²³ E.P. Royappa v. State of T.N., (1974) 4 SCC 3.

²⁴ INDIA CONSTI, Art. 14.

²⁵ Maneka Gandhi v. Union of India, (1978) 1 SCC 248.

²⁶ C.B. Muthamma v. Union of India, (1979) 4 SCC 260.

²⁷ Vishaka v. State of Rajasthan, (1997) 6 SCC 241.

“Om Kumar v. Union of India (2001)²⁸”

This case went a step further to clarify on proportionality that means the actions of the government are supposed to be equal to the rights they impact.

“K.S. Puttaswamy v. Union of India (2017)²⁹” relied on Nargesh Mirza when it considered the question of privacy rights and accountability of administration. The fact that the Puttaswamy judgment placed special stress on proportionality, and procedural safeguards, was suggestive of the continued relevance of administrative law principles laid down in earlier gender equality cases. This case distinguished “Wednesbury Reasonableness” and proportionality analysis as there was a clever manner in which the courts enhanced the review of government decisions on the basis of the influence of Nargesh Mirza.

“Tata Cellular v. Union of India (1994)³⁰” applied similar principles in the context of judicial review of administrative discretion in the contract context of governmental contracting. The ground of judicial review laid out at length in the Tata Cellular judgment indicated the increased scope of application of the administrative law principles laid down in cases such as Nargesh Mirza.

“State of Punjab v. Khan Chand (1973)³¹” which gave the precedent relating to the constitutional limits of discrete power to the assortment in knowing the analysis of unanalysed administrative power. The Khan Chand principle on the need to define and confine discretionary power by adequate standards, and the fact that that discretionary power cannot be an absolute, contributed to the invalidation of Regulation 47.

“Shreya Singhal v. Union of India (2015)³²”, to which principles on vagueness and excessive discretion within administrative and Shreya Singhal Judgment was stressed on the aspect of precision in delegated authority and giving such directions, reflected on the Evolution of the administrative law principles by Court dealing with the issues of the arbitrary power of the government.

²⁸ Om Kumar v. Union of India, (2001) 2 SCC 386.

²⁹ K.S. Puttaswamy (Aadhar-5J.) v. Union of India, (2018) 1 SCC 809.

³⁰ Tata Cellular v. Union of India, (1994) 6 SCC 651.

³¹ State of Punjab v. Khan Chand, (1974) 1 SCC 549.

³² Shreya Singhal v. Union of India, (2015) 5 SCC 1.

“G. Ganayutham v. Union of India (1997)³³”, which fine-tuned the use of the principles of proportionality in administrative disciplinary matters. The Ganayutham passus distinction between the primary and secondary standards of review had a role in the subsequent evolution of judicial review doctrine dealing with administrative discretion.

Impact on Administrative Law and Constitutional Jurisprudence

The impact of the case of “*Air India v. Nargesh Mirza*³⁴” and its judgment has influenced the administrative law not only on a particular decision but this case has specific holdings of the case to have an effect on the broader approach to judicial review, interpretation of the constitution and accountability in administration. interpretation of the constitution and accountability in administration.

The case established general principles relating to the constitutional limits on administrative prudence that continues to be relevant to the era of development of a modern administrative law in this modern generation.

The blend of constitutional mores of equality with the principles of the administrative law in the case created a complete structure of the analysis of the governmental action which impacts the rights of a particular individual. This assimilation had subsequent effects in the formulation of standards of judicial review that were not limited to the issue of procedural sufficiency, but also incorporated the matter of substantive constitutional fidelity.

The emphasis of the case on the prevention of arbitrary administrative action was itself a reentry into more general constitutional jurisprudence around matters of the rule of law and governmental accountability. The judicial involvement in curbing executive power through the hermeneutical and substantive gadgets by the Court provided a precedence in restricting the powers of the Court in interpreting the powers of the executive.

The case despite its limitations added to the gender equality jurisprudence of the time as it formed the basis of the subsequent challenges claims later raised against this discriminatory practice and policy by the administration. The principles identified concerning employment discrimination and reproductive autonomy influenced the expansion of the Constitution in consideration of issues on women rights and gender equality.

³³ Union of India v. G. Ganayutham, (1997) 7 SCC 463.

³⁴ Air India v. Nergesh Meerza, (1981) 4 SCC 335.

CONCLUSION

The landmark case of “*Air India v. Nargesh Mirza 1981*³⁵” shows how the administrative authorities can go about framing rules and whether such rules can respect the equality provisions of the Constitution. Air India made unfair rules for women, and this case arose because of the violation of women's rights. This case says that women will lose their jobs if they get pregnant within four years of joining, or if they cross the age of 35. According to our constitution, these rules are very discriminatory and arbitrary in nature, and the main issue is whether administrative convenience could justify such restrictions.

These rules were struck down by the Supreme Court, making them unconstitutional as per the constitutional provisions. The rule of forcing women to choose between career and motherhood violates the dignity of women. The court accepted that the retirement age of 35, with the option of extension, and showed that its approach was still influenced by traditional gender roles.

The principle of administrative discretion cannot be absolute, as stated in this case, and rules that are made by public authority must follow the guidelines that are in favour of the public. The arbitrary and unreasonable and non-arbitrariness remained central to administrative law today.

This case is also related with constitutional fairness with administrative law, and it showed that when administrative rules affect fundamental rights, courts must apply strict judicial review. “Articles 14³⁶, 15³⁷ and 16³⁸” essential that states prevent discrimination and confirm equal opportunity. The court recognised that genuine administrative needs like efficiency and safety may justify certain classifications if they are not arbitrary.

Year after year, that judgment became the judgment of the revising government in areas other than employment as well, such as in areas of regulation, governance and digital policy. This gives a balance between administration being able to be free and manage service, yet cannot breach constitutional limits.

So, the case balanced administrative efficiency with constitutional protections. And it established a enduring pattern of fairness and accountability. This means that administrative

³⁵ Air India v. Nergesh Meerza, (1981) 4 SCC 335.

³⁶ INDIA CONSTI, Art. 14.

³⁷ INDIA CONSTI, Art. 15.

³⁸ INDIA CONSTI, Art. 16.

power is exercised responsibly under the constitution and without sacrificing individual rights. Even to date, it is a guide for courts and administrators in handling the strain between governance and equality.