REASONED DECISION-MAKING IN ADMINISTRATIVE LAW: JUDICIAL EVOLUTION, CONSTITUTIONAL FOUNDATIONS, AND CONTEMPORARY CHALLENGES

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ABSTRACT

Administrative decision-making increasingly shapes individual rights, yet the duty to give reasons, central to fair governance, remains inconsistently applied across Indian jurisdictions and administrative contexts, often reduced to procedural formality rather than genuine justification. This study critically examines the judicial and doctrinal evolution of reasoned decision-making in Indian administrative law, drawing comparative insights from the United Kingdom and the United States, to assess whether the Indian framework adequately balances administrative flexibility with fairness and transparency. Employing doctrinal analysis of constitutional provisions, statutes, and landmark judicial pronouncements, the study traces the doctrine's development from a common law natural justice principle into an enforceable constitutional command under Articles 14 and 21. Findings reveal that despite robust judicial articulation, implementation remains uneven due to the absence of a uniform statutory mandate, compounded by emerging challenges from algorithmic and automated decision-making. The study concludes that codification, institutional training, and technological transparency measures are essential to transform reasoned decision-making from judicial rhetoric into substantive administrative practice.

Keywords: reasoned decision-making, administrative law, natural justice, judicial review, algorithmic accountability.

Introduction

Administrative decision-making lies at the heart of modern governance, shaping the rights and obligations of individuals in diverse spheres such as licensing, taxation, public employment, and welfare.[1] As administrative authorities wield vast discretionary powers, the legitimacy of their decisions depends not merely on outcomes but on the process by which those outcomes are reached.[2] In this context, the duty to give reasons has emerged as a cornerstone of administrative justice, ensuring that discretion is exercised in a disciplined, transparent, and rational manner.

The obligation to record reasons is the soul of administrative justice; it transforms decision-making from a mechanical act into a deliberative process grounded in fairness and accountability.[3] By compelling decision-makers to articulate their reasoning, the duty fosters public confidence, facilitates judicial review, and deters arbitrary or mala fide exercise of power. Moreover, it empowers affected individuals to understand, accept, or challenge administrative actions, thereby operationalizing the right to be heard and the broader principle of natural justice.

Yet, despite its conceptual importance, the application of the duty to give reasons remains inconsistent across jurisdictions and administrative contexts. Courts have oscillated between treating it as a facet of natural justice and as a matter of statutory obligation. This inconsistency reflects a deeper tension between administrative discretion and the imperative of reason-giving, a tension that lies at the heart of this research.

This project seeks to critically examine how the duty to provide reasons has evolved in India, drawing comparative insights from the United Kingdom and the United States. It explores whether the Indian framework adequately balances administrative flexibility with the demands of fairness and transparency, and how comparative models may inform future judicial or legislative development.[4]

[1] M P Jain, *Principles of Administrative Law* 317–19 (8th ed. 2017).
[2] H W R Wade & C F Forsyth, *Administrative Law* 29–31 (12th ed. 2021).
[3] *Union of India v. Mohan Lal Capoor*, (1973) 2 S.C.C. 836, 28 (India).
[4] Cass R Sunstein, *The Limits of Arbitrary Power: Why Administrators Must Give Reasons*, 114 Am. Pol. Sci. Rev. 761 (2020), https://www.cambridge.org/core/journals/american-political-science-review/article/limits-of-arbitrary-power-why-administrators-must-give-reasons/6F8C3B8E9A8A412B8B50E5F3B4B319C3 (last visited Oct. 8, 2025).

Review of Literature

1. **M. P. Jain and S. N. Jain, *Principles of Administrative Law*, Amita Dhanda**:[5] This text provided the doctrinal foundation for understanding key administrative law principles such as discretion, judicial review, and natural justice. It helped clarify the scope of "reasoned decision-making" as a safeguard against arbitrariness and guided my interpretation of judicial trends. Its detailed analysis of remedies and procedural fairness informed my comparative evaluation of Indian jurisprudence.

2. **S. P. Sathe, *Administrative Law:*[6]** The text offered critical insight into the historical and constitutional development of administrative law in India. It illuminated the balance between judicial activism and restraint, helping shape my analysis of how courts enforce the duty to provide reasons. His treatment of delegated legislation and procedural safeguards deepened my understanding of administrative accountability and the rule of law.

3. **Sujit Choudhry, 'Constitutionalizing Administrative Law in the Indian Supreme Court'**:[7] This article was instrumental in situating my research within the broader constitutional framework. Choudhry demonstrates how the Supreme Court of India has progressively "constitutionalized" administrative law by interpreting principles such as reasoned decision-making, fairness, and proportionality through Articles 14 and 21. The work deepened my understanding of how procedural norms, initially derived from natural justice, have evolved into enforceable constitutional duties that guide modern administrative jurisprudence.

4. **S. P. Sathe, 'Judicial Activism: The Indian Experience' (2002) Washington University Journal of Law & Policy 29 129:**[8] The article provided essential theoretical grounding for assessing the nature and limits of judicial intervention in administrative processes. His analysis of judicial activism illuminated how Indian courts have expanded doctrines like reasoned decision-making and proportionality to strengthen accountability and fairness in governance. This work guided my evaluation

[5] M P Jain & S N Jain, *Principles of Administrative Law* (Amita Dhanda ed., 8th ed. 2023).
[6] S P Sathe, *Administrative Law* (7th ed. 2017).
[7] Sujit Choudhry, *Constitutionalizing Administrative Law in the Indian Supreme Court*, 16 Int'l J. Const. L. 475 (2018).
[8] S P Sathe, *Judicial Activism: The Indian Experience*, 29 Wash. U. J.L. & Pol'y 129 (2002).

of the judiciary's evolving role in transforming administrative review from a procedural safeguard into a substantive constitutional mechanism

Statement of Problem

Though the "duty to give reasons" is central to fair administrative action, its application in India remains inconsistent and often superficial. Courts enforce it rigorously in quasi-judicial settings but hesitate in purely administrative or policy matters, leading to selective transparency. As a result, reason-giving often becomes a formality rather than a genuine check on discretion, an issue now amplified by the rise of automated and algorithmic decision-making.

Hypothesis

The duty to give reasons must evolve from a procedural formality to a substantive requirement ensuring intelligible and reviewable justification for every administrative decision. Embedding this principle in statutory and institutional frameworks can strengthen accountability, curb arbitrariness, and aligWhat reforms are needed to strengthen the doctrine amid emerging challenges like algorithmic decision-making?

Concept and Rationale of Decision Making

Purpose and Theoretical Foundation

The doctrine of reasoned decision-making lies at the core of administrative justice and constitutional governance. It demands that every administrative or judicial decision be supported by intelligible and rational justification. In essence, decisions must "speak for themselves" through clear reasoning that discloses how the authority reached its conclusion. Such justification strengthens transparency, accountability, and adherence to the rule of law.

Meaning of "Reasoned Decision"

A reasoned decision is one that articulates the process of reasoning through which an outcome has been reached. It demonstrates that the decision-maker has applied their mind to the relevant facts, evidence, and legal standards. The Supreme Court of India, in *S N Mukherjee v Union of*

India[9] held that the recording of reasons is "an indispensable part of a sound system of judicial review" and that it serves as "a valid discipline for the authority itself." This ensures that justice is not only done but also seen to be done.

Historical Evolution

The concept of reasoned decision-making emerged from common law principles of natural justice. Historically, under classical common law, administrative authorities were under no obligation to provide reasons for their decisions.[10] The transformation of this position occurred gradually through the influence of constitutional developments and judicial review.

In the United Kingdom, the evolution was marked by the Tribunals and Inquiries Act 1958 (now consolidated as the Tribunals and Inquiries Act 1992), which required listed tribunals to provide reasons when requested by parties. The Donoughmore Committee[11] and the Franks Committee were instrumental in recommending this shift,[12] emphasizing fairness and accountability in administrative adjudication. English courts later held in Re Poyser and Mill's Arbitration[13] that the reasons given must be "proper, adequate and intelligible."

In India, the duty to give reasons developed primarily through judicial interpretation. The Supreme Court, in *Siemens Engineering & Manufacturing Co v Union of India*,[14] elevated the duty to give reasons to a basic principle of natural justice on par with audi alteram partem. Subsequently, in *Maneka Gandhi v Union of India*,[15] the Court linked this duty to the constitutional guarantees of equality and fairness under Articles 14 and 21. Finally, in S N Mukherjee v Union of India (1990) 4 SCC 594, the Court consolidated the doctrine, affirming that a reasoned decision is an integral component of fair administrative process and the rule of law.

Relationship with the Rule of Law and Principles of Natural Justice

The rule of law, as articulated by A.V. Dicey, requires that every act of government be justified

[9] (1990) 4 S.C.C. 594 (India).
[10] M P Jain & S N Jain, *Principles of Administrative Law* 104 (7th ed. 2017).
[11] Cmd. 4060 (1932) (U.K.).
[12] G Marshall, *The Franks Report on Administrative Tribunals and Enquiries*, 35 Pub. Admin. 347 (1957).
[13] [1963] 1 All E.R. 612 (Eng.).
[14] A.I.R. 1976 SC 1785 (India).
[15] (1978) 1 S.C.C. 248 (India).

by law and not left to arbitrary discretion.[16] Requiring decision-makers to provide reasons serves as a procedural guarantee that state power is exercised rationally and consistently.

Within the broader framework of natural justice, the duty to give reasons is often termed the "third principle", complementing *nemo judex in causa sua* and *audi alteram partem*. The rationale is straightforward: the right to be heard loses meaning if the decision-maker's reasoning remains undisclosed. The furnishing of reasons ensures that parties can discern whether their submissions were properly considered, thereby reinforcing procedural fairness and legitimacy.

Thus, the requirement of reasoned decision-making both derives from and reinforces the principles of natural justice. It prevents arbitrariness, legitimises administrative power, and strengthens democratic accountability.

Scholarly Rationale

From a scholarly perspective, the rationale for reasoned decision-making is multi-dimensional:

1. Promotes Good Governance: Giving reasons enhances the quality and legitimacy of administrative action. According to Anju P Singh,[17] it ensures transparency and accountability, leading to more thoughtful and fair decisions.

2. Facilitates Judicial and Appellate Review: A reasoned record allows appellate and reviewing courts to evaluate the legality and propriety of decisions without reopening factual disputes.[18]

3. Dissuades Abuse of Discretion: When officials must justify their actions, the likelihood of bias or mala fide intent is significantly reduced. The Supreme Court in *Madhya Pradesh Industries Ltd v Union of India*[19] observed that "the condition to give reasons minimizes arbitrariness and gives satisfaction to the party against whom the order is made."

[16] A V Dicey, *Introduction to the Study of the Law of the Constitution* (10th ed. 1959).
[17] *Reasoned Decision: The Necessity and Importance to Achieve Transparent and Accountable Society*, 3 J. Nat'l L. Univ. Delhi 163 (2015).
[18] *Govt. Branch Press v. Belliappa*, A.I.R. 1979 SC 429 (India).
[19] A.I.R. 1966 SC 671 (India).

4. Fosters Public Confidence: Public trust in administrative institutions depends on visible fairness. Reasoned decisions fulfil citizens' legitimate expectations that justice will be both done and explained.[20]

5. Strengthens the Rule of Law: By ensuring that every act of the executive is based on rationality rather than whim, the principle embodies Dicey's ideal that all public authorities must act within and under the law.[21]

The doctrine of reasoned decision-making represents the intersection of legal rationality, administrative accountability, and democratic legitimacy. Originating in common law fairness, it has evolved into a constitutional imperative in India. It ensures that governance remains anchored in legality and reason, not discretion. By mandating intelligible justification for every decision, the doctrine preserves the integrity of the rule of law and the enduring principles of natural justice.

Constitutional and Judicial Foundations in India

The evolution of the duty to give reasoned administrative decisions in India reflects the judiciary's remarkable role in constitutionalizing principles of fairness, transparency, and accountability within governance. Though the Constitution does not explicitly impose such a duty, Indian courts have developed it as a necessary element of the *rule of law* and as an inseparable facet of natural justice. Through this jurisprudence, the Indian State has been progressively transformed from an administrative authority bound by procedure to a constitutional entity accountable through reason.

Historically, Indian administrative law followed the English common law approach, under which authorities were not obliged to record reasons unless a statute so required. This colonial legacy gradually gave way to constitutional accountability once the Supreme Court began dismantling the distinction between administrative and quasi-judicial functions. In *A.K. Kraipak v. Union of India*,[22] the Court held that even administrative actions must conform to principles of natural justice, recognising that the dividing line between administrative and judicial power had become "thin and almost obliterated." From this point onwards, Indian

[20] R Vijayan, *Administrative Decisions and Duty to Give Reasons: A Search for Justification*, 26 J. Indian L. Inst. 70 (1984).
[21] Yashomati Ghosh, *Textbook on Administrative Law* 21 (2015).
[22] *A.K. Kraipak v. Union of India*, (1969) 2 S.C.C. 262, 13 (India).

jurisprudence moved steadily towards recognising *reasoned decision-making* as a hallmark of fairness.

This transformation crystallised in *Siemens Engineering & Manufacturing Co. of India Ltd. v. Union of India*,[23] where the Supreme Court declared that administrative or quasi-judicial authorities must provide clear and explicit reasons for their orders. The Court elevated this obligation to the rank of a basic principle of natural justice, warning that a mere pretence of reasoning would not satisfy the law. The reasoning requirement thus became more than a procedural formality, it was now a substantive safeguard against arbitrariness and a means to ensure that justice was not only done, but seen to be done.

In *S.N. Mukherjee v. Union of India*,[24] the Court consolidated this principle, holding that the duty to record reasons extends to all administrative authorities exercising quasi-judicial powers, even if their decisions are not appealable. It explained that while administrative reasoning need not be as elaborate as that of a court, the decision must still disclose a rational link between the evidence and the conclusion. The reasons must be "clear and explicit," showing that the authority applied its mind to the relevant material and enabling effective judicial review. The Court justified this requirement as essential to both administrative discipline and the citizen's right to fair treatment.

A similar standard was reaffirmed in *State of West Bengal v. Atul Krishna Shaw*,[25] where the Supreme Court held that adequacy of reasoning is context-dependent but must always be sufficient to allow appellate or judicial scrutiny. A decision devoid of reasons, the Court observed, defeats both fairness and accountability. In *Manohar v. State of Maharashtra*,[26] the Court invoked Section 4(1)(d) of the *Right to Information Act, 2005*, which requires every public authority to furnish reasons for its decisions.[27] This statutory codification of the duty to reason reflects its broader constitutional lineage.

The constitutional anchoring of this duty lies in Articles 14, 19 and 21. The jurisprudence of *E.P. Royappa v. State of Tamil Nadu* established that arbitrariness is the antithesis of equality;

[23] *Siemens Eng'g & Mfg. Co. of India Ltd. v. Union of India*, (1976) 2 S.C.C. 981, 6 (India).
[24] *S.N. Mukherjee v. Union of India*, (1990) 4 S.C.C. 594, 35–36 (India).
[25] *State of West Bengal v. Atul Krishna Shaw*, (1990) 1 S.C.C. 347, 10 (India).
[26] *Manohar v. State of Maharashtra*, (2012) 13 S.C.C. 14, 12–14 (India).
[27] Right to Information Act, 2005, § 4(1)(d) (India).

decisions lacking reasons are by nature arbitrary and violate Article 14.[28] This principle gained further strength in *Maneka Gandhi v. Union of India*,[29] where the impoundment of a passport without disclosure of reasons was held unconstitutional. The Court connected procedural fairness with the right to life and personal liberty under Article 21, holding that administrative action restricting fundamental rights must always be supported by intelligible reasons. This linkage made reason-giving a constitutional requirement, integral to both equality and due process.

Judicial review under Articles 136, 226 and 227 also depends on the existence of reasoned decisions. In *Hari Nagar Sugar Mills Ltd. v. Shyam Sunder*[30] and *Bhagat Raja v. Union of India*,[31] the Supreme Court noted that appellate and supervisory jurisdiction would be rendered meaningless without recorded reasons, as higher courts would have no material to assess the legality of administrative action. Thus, the obligation to record reasons is not only for the benefit of the affected party but also to preserve the integrity of judicial oversight.

Recent jurisprudence has further constitutionalized this principle through the doctrine of proportionality. In *Madhyamam Broadcasting Ltd. v. Union of India*,[32] the Supreme Court held that restrictions on procedural rights, including the right to a reasoned decision, must satisfy a structured proportionality test. The Court replaced the earlier "prejudice-based" approach with a four-part inquiry: the restriction must pursue a legitimate aim, have a rational connection to that aim, be necessary (meaning no less rights-restrictive alternative exists), and balance the social benefits against the harm to the right-holder. By applying this standard, the Court made it clear that any dilution of the duty to give reasons must itself be justified on constitutional grounds. Administrative efficiency may qualify as a legitimate aim, but opacity cannot be justified where less restrictive, more transparent alternatives exist.

Through these decisions, Indian law has articulated a coherent standard for administrative reasoning: reasons must be clear, explicit, and intelligible; they must show application of mind and permit review; and their adequacy is assessed contextually. Absence of reasons invites the presumption of arbitrariness and illegality. As the Court held in *Madhya Pradesh Industries*

[28] *E.P. Royappa v. State of Tamil Nadu*, (1974) 4 S.C.C. 3, 85 (India).
[29] *Maneka Gandhi v. Union of India*, (1978) 1 S.C.C. 248, 56–59 (India).
[30] *Hari Nagar Sugar Mills Ltd. v. Shyam Sunder*, A.I.R. 1961 SC 1669, 23 (India).
[31] *Bhagat Raja v. Union of India*, A.I.R. 1967 SC 1606, 8 (India).
[32] *Madhyamam Broad. Ltd. v. Union of India*, (2023) 9 S.C.C. 573, 59–61 (India).

Ltd. v. Union of India,[33] giving reasons minimises arbitrariness, satisfies the affected party, and enables appellate authorities to keep administrative power within legal bounds.

The normative foundation of this doctrine lies in the rule of law and the separation of powers. Recording reasons disciplines the decision-maker, legitimises administrative action, and sustains public confidence in governance. It also ensures that executive discretion remains subject to constitutional control. As *S.N. Mukherjee* observed, the duty to give reasons is "a valid discipline for the authority itself and a protection for the citizen." This dual function of self-restraint and citizen empowerment, captures the constitutional essence of reasoned decision-making.

In sum, the Indian judiciary has elevated the duty to give reasons from a procedural expectation to a constitutional command. It now operates as both a fundamental component of natural justice and an enforceable aspect of Articles 14 and 21. Administrative authorities must therefore issue decisions that are reasoned, reviewable, and transparent; and any restriction upon this duty must withstand the test of proportionality. In a constitutional democracy committed to the rule of law, reason has become the lifeblood of legitimacy. As the Supreme Court eloquently stated in *Raj Kishore Jha v. State of Bihar*,[34] "reason is the heartbeat of every conclusion; without it, justice is lifeless."

Comparative Perspective

The judiciary's recognition of the duty to give reasons has significantly expanded the contours of administrative fairness in India. Yet, translating this judicially articulated ideal into an administrative habit remains elusive. While landmark cases such as *S.N. Mukherjee v. Union of India*[1] and *Kranti Associates Pvt. Ltd. v. Masood Ahmed Khan*[35] constitutionalised the principle, the implementation in practice often reflects procedural formalism rather than genuine justification. In routine administrative contexts, transfers, licensing, procurement, or disciplinary proceedings authorities frequently issue templated orders containing stock phrases like "after due consideration" or "in the public interest," without any meaningful disclosure of

[33] *Madhya Pradesh Indus. Ltd. v. Union of India*, A.I.R. 1966 SC 671, 7 (India).
[34] *Raj Kishore Jha v. State of Bihar*, (2003) 11 S.C.C. 519, 12 (India).
[35] *Kranti Assocs. Pvt. Ltd. v. Masood Ahmed Khan*, (2010) 9 S.C.C. 496, 47–49 (India).

reasoning. This tokenistic compliance reduces the doctrine to a mechanical exercise, stripping it of its democratic purpose.

This disconnect reveals a deeper institutional flaw. The absence of a *uniform statutory mandate* for reason-giving allows administrators to treat the duty as optional, and courts apply it unevenly across contexts. It is robustly enforced in quasi-judicial proceedings but inconsistently invoked in purely administrative or policy domains. This inconsistency weakens the doctrine's normative force and perpetuates a culture of opacity in governance. Codifying the duty either through an amendment to the *General Clauses Act, 1897* or by incorporating a general "duty to provide reasons" clause across enabling statutes could transform it from a judicially implied expectation into a binding administrative standard**.** Similar codification efforts exist in jurisdictions like the United States under the *Administrative Procedure Act, 1946*,[36] which mandates "reasoned decision-making" as a prerequisite for the validity of administrative action[3].

However, the barriers to meaningful compliance are not merely legal but also structural and cultural. Indian administrators operate under immense workload pressures and are seldom trained in legal reasoning or justification writing. In the bureaucratic mindset, recording reasons is often perceived as a vulnerability, an opportunity for higher authorities, auditors, or courts to question decisions rather than as a safeguard of legitimacy. Hence, capacity-building measures are essential. Decision-making training must be integrated into the syllabi of institutions such as the Lal Bahadur Shastri National Academy of Administration and state training academies, with dedicated modules on evidence-based reasoning, proportionality, and fairness in administrative action.

Further, a system of transparency audits could ensure that reason-giving is substantive, not symbolic. These audits, akin to internal performance reviews, could periodically evaluate samples of administrative orders for the quality and clarity of reasoning, thereby creating accountability within departments. Even the Central Vigilance Commission (CVC)**,** in its *Vigilance Manual*, underscores the importance of "speaking orders" in disciplinary and vigilance matters to promote transparency and ensure decisions withstand scrutiny.[37]

[36] Administrative Procedure Act of 1946, § 706(2)(A) (U.S.).
[37] Cent. Vigilance Comm'n, *Vigilance Manual* ch. 12, § 12.3 (7th ed. 2021), https://www.cvc.gov.in/?q=documents/vigilance-manual (last visited Oct. 8, 2025).

Expanding such initiatives beyond vigilance domains into general administration would foster an institutional culture where justification becomes the norm rather than the exception.

The rise of digital governance and algorithmic decision-making adds another layer of complexity. From welfare exclusions in Aadhaar-linked databases to predictive analytics in taxation and policing, administrative discretion is increasingly mediated by technology. These algorithmic systems often operate as "black boxes," where neither citizens nor officials can fully explain how an outcome was produced. Without transparency in the algorithm's logic, data sources, or decision parameters, the traditional judicial requirement of "reasons" becomes meaningless. To address this, the doctrine must evolve into a "duty to explain", encompassing not only human reasoning but also the intelligibility of automated decision-making. The European Union's *General Data Protection Regulation (GDPR)*, particularly Article 22, provides a model by recognizing an individual's right to an explanation for automated decisions.[38]

At the same time, technology can be harnessed to enhance, not undermine, reasoned governance. Digital decision-support systems could be designed with inbuilt reasoning templates that prompt officers to record facts, statutory bases, and justifications before finalizing an order. The Department of Administrative Reforms and Public Grievances (DARPG) could mandate such "reasoning interfaces" in e-office modules, promoting both efficiency and accountability.[39] This approach aligns with global best practices, where countries such as Australia[40] and the United Kingdom[41] have introduced "decision-writing standards" and reasoning checklists for public officials.

In sum, while Indian courts have repeatedly declared that "reason is the soul of justice," judicial articulation alone cannot sustain the doctrine. The true test lies in institutional internalization, embedding reasoned decision-making within administrative training, digital architecture, and statutory frameworks. Only then can it function not merely as a reactive judicial safeguard but

[38] Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation), art. 22.
[39] Dep't of Admin. Reforms & Pub. Grievances (India), *e-Office Mission Mode Project: Guidelines and Best Practices* (2022), https://darpg.gov.in (last visited Oct. 8, 2025).
[40] Austl. Pub. Serv. Comm'n, *Decision-Making and Reasoning Standards for Australian Public Service Employees* (2021), https://www.apsc.gov.au (last visited Oct. 9, 2025).
[41] UK Civil Serv., Cabinet Office, *Decision Writing and Record Keeping Guidance for Public Officials* (2020), https://www.gov.uk/government/publications/decision-writing-guidance (last visited Oct. 9, 2025).

as a proactive tool of democratic governance.

Conclusion

The duty to give reasons is far more than a procedural nicety, it is the moral and constitutional compass of administrative governance. It disciplines discretion, legitimizes power, and bridges the gap between authority and accountability. A reasoned decision reflects respect for the governed; it transforms coercive power into rational governance and opacity into trust.

As this research reveals, India's framework has evolved through judicial craftsmanship rather than legislative design. Yet, in the era of automated decision-making and expanding bureaucratic discretion, judicial evolution alone is insufficient. Codification, administrative training, and technological transparency are essential to prevent the doctrine from collapsing into rhetoric.

Ultimately, the right to a reasoned decision is the citizen's assurance that governance operates under law, not whim. It reaffirms that fairness is not a favor granted by the state but a *right earned by the citizen.* When reason guides authority, the rule of law becomes not an aspiration, but an administrative reality.

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