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# THE INTERRELATIONSHIP BETWEEN ARTICLE 14 AND ARTICLE 19 IN PROTECTING INDIVIDUAL RIGHTS

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## **Introduction**

The Constitution of India stands as one of the most comprehensive constitutional documents in the world, embodying the aspirations of a newly independent nation committed to justice, liberty, equality, and fraternity. At the heart of this constitutional framework lie the Fundamental Rights enshrined in Part III, which serve as guarantees against arbitrary state action and as instruments for the protection of individual liberties. Among these rights, Article 14 and Article 19 occupy a central position in safeguarding democratic freedoms and ensuring fairness in governance.

Article 14 guarantees equality before the law and equal protection of laws within the territory of India. It embodies the principle that the state must treat individuals equally and must not discriminate arbitrarily. Article 19, on the other hand, provides citizens with a set of essential freedoms such as the freedom of speech and expression, the right to assemble peacefully, the right to form associations, the freedom to move freely throughout the territory of India, the freedom to reside and settle in any part of the country, and the freedom to practice any profession or carry on any occupation, trade, or business. These freedoms collectively form the foundation of a democratic society.

Although these two provisions appear distinct in their wording and scope, their practical application often overlaps. The judiciary has repeatedly emphasized that Articles 14 and 19 must be interpreted together in order to protect individual rights effectively. Any law that restricts freedoms under Article 19 must not only fall within the permissible grounds of restriction but must also satisfy the test of equality and non-arbitrariness under Article 14.

This paper examines the interrelationship between Article 14 and Article 19, exploring how they complement each other in protecting individual rights. It also analyzes judicial interpretations, important constitutional doctrines, and landmark cases that have shaped the

understanding of this relationship.

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

Article 14 of the Constitution of India provides that:

The State shall not deny to any person equality before the law or the equal protection of the laws within the territory of India. <sup>1</sup>

This provision contains two key principles: equality before law and equal protection of laws. While these concepts may appear similar, they have distinct origins and meanings.

Equality before the law is a concept borrowed from the British constitutional tradition and reflects the idea that all individuals, regardless of their status, are subject to the ordinary law of the land. No person is above the law, and every individual is equally accountable before the courts.

Equal protection of laws, on the other hand, is derived from the Fourteenth Amendment to the Constitution of the United States. It requires the state to treat similarly situated individuals alike and to apply laws equally. However, it does not prohibit reasonable classification by the state.

### **Reasonable Classification**

The doctrine of reasonable classification allows the state to treat different groups differently, provided that such classification satisfies two essential conditions:

1. The classification must be based on an intelligible differentia that distinguishes persons or things grouped together from others.
2. The differentia must have a rational nexus with the objective sought to be achieved by the law.

If these conditions are not satisfied, the classification becomes arbitrary and violative of Article 14.

### **Evolution of Article 14**

Initially, the interpretation of Article 14 was limited to examining whether a law created a

reasonable classification. However, over time, the Supreme Court expanded its scope by introducing the doctrine of arbitrariness. According to this doctrine, any state action that is arbitrary, unreasonable, or irrational violates Article 14, even if it does not involve classification.

This transformation significantly broadened the protective scope of Article 14, making it a powerful tool against misuse of state power.

### **Understanding Article 19: Protection of Certain Freedoms**

Article 19 of the Constitution guarantees six fundamental freedoms to citizens. These freedoms are essential for the functioning of a democratic society and allow individuals to express their opinions, participate in political processes, and pursue economic opportunities.

Article 19(1) guarantees the following freedoms:

1. Freedom of speech and expression
2. Freedom to assemble peacefully and without arms
3. Freedom to form associations or unions
4. Freedom to move freely throughout the territory of India
5. Freedom to reside and settle in any part of India
6. Freedom to practice any profession or carry on any occupation, trade, or business<sup>2</sup>

These freedoms are not absolute. The Constitution allows the state to impose reasonable restrictions on these rights under clauses (2) to (6) of Article 19. Such restrictions may be imposed in the interests of:

- Sovereignty and integrity of India
- Security of the State
- Public order

- Decency or morality
- Contempt of court
- Defamation
- Incitement to an offence

The key word here is “reasonable.” Courts are responsible for determining whether a restriction imposed by the state is reasonable or excessive.

### **The Interrelationship between Article 14 and Article 19**

Although Articles 14 and 19 deal with different aspects of fundamental rights, they are closely interconnected. Article 14 ensures equality and non-arbitrariness in state actions, while Article 19 protects specific individual freedoms. Together, they form a constitutional framework that safeguards citizens from both discriminatory and excessive restrictions imposed by the state.

#### **Article 14 as a Test of Reasonableness**

When the state imposes restrictions on freedoms guaranteed under Article 19, such restrictions must pass the test of reasonableness. Article 14 plays a crucial role in this evaluation because it ensures that the restrictions are not arbitrary or discriminatory.

For example, if the government restricts freedom of speech under Article 19(2), the courts may examine whether the restriction applies equally to all individuals or unfairly targets specific groups. If the restriction discriminates without reasonable justification, it may be struck down as violating Article 14.

Thus, Article 14 acts as a constitutional safeguard ensuring that restrictions under Article 19 remain fair and non-arbitrary.

#### **Complementary Nature of the Two Articles**

The relationship between Articles 14 and 19 can be described as complementary rather than conflicting. While Article 19 grants freedoms, Article 14 ensures that the exercise of state power affecting those freedoms is fair and equal.

This complementary relationship ensures that:

- Citizens enjoy freedom without arbitrary interference.
- State actions remain within constitutional limits.
- Individual rights are balanced with public interest.

### **The Doctrine of Arbitrariness**

The doctrine of arbitrariness developed by the Supreme Court further strengthened the link between Articles 14 and 19. According to this doctrine, any law or administrative action that is arbitrary is inherently unequal and therefore violative of Article 14.

When a restriction under Article 19 is challenged, courts often examine whether it is arbitrary. If it is found to be arbitrary, it automatically violates Article 14 and becomes unconstitutional.

### **Judicial Interpretation of the Interrelationship**

The Supreme Court of India has played a pivotal role in defining and strengthening the relationship between Articles 14 and 19. Through several landmark judgments, the Court has established that laws affecting fundamental rights must satisfy the requirements of both provisions.

### **State of West Bengal v. Anwar Ali Sarkar (1952)**

One of the earliest cases addressing equality under Article 14 was *State of West Bengal v. Anwar Ali Sarkar*<sup>3</sup>. In this case, the Supreme Court examined the validity of a law that allowed certain cases to be tried by special courts. The Court held that the law violated Article 14 because it allowed arbitrary selection of cases without clear guidelines.

This case established the principle that laws must not give excessive discretionary power to authorities, as such power can lead to discrimination.

### **Keshava Nanda Bharati v. State of Kerala (1973)**

The landmark judgment in *Keshava Nanda Bharati v. State of Kerala*<sup>4</sup> is primarily known for establishing the basic structure doctrine. However, the case also highlighted the importance of

fundamental rights, including Articles 14 and 19, as essential components of the constitutional framework.

The Court emphasized that these rights cannot be destroyed even by constitutional amendments, as they form part of the basic structure of the Constitution.

### **E.P. Royappa v. State of Tamil Nadu (1974)**

In *E.P. Royappa v. State of Tamil Nadu*<sup>5</sup>, the Supreme Court expanded the interpretation of Article 14 by introducing the concept of arbitrariness. Justice P.N. Bhagwati famously observed that:

*"Equality is a dynamic concept with many aspects and dimensions and it cannot be cribbed, cabined and confined within traditional doctrinaire limits."*

The Court held that arbitrariness and equality are opposites; therefore, any arbitrary state action violates Article 14.

### **Maneka Gandhi v. Union of India (1978)**

Perhaps the most significant case illustrating the relationship between Articles 14 and 19 is *Maneka Gandhi v. Union of India*<sup>6</sup>. In this case, the government impounded the passport of Maneka Gandhi without providing adequate reasons.

The Supreme Court held that any law affecting personal liberty must satisfy the requirements of Articles 14, 19, and 21 simultaneously. The Court emphasized that these provisions are not mutually exclusive but form a "golden triangle" of fundamental rights.

This judgment revolutionized constitutional jurisprudence by establishing that state actions must be fair, reasonable, and non-arbitrary.

### **The Role of the Judiciary in Protecting Individual Rights**

The judiciary acts as the guardian of the Constitution and plays a crucial role in ensuring that the relationship between Articles 14 and 19 is preserved. Through judicial review, courts examine whether laws and government actions violate fundamental rights.

Judicial intervention becomes particularly important in cases where the state attempts to impose restrictions on freedoms. By applying the principles of equality, reasonableness, and fairness, courts ensure that individual rights are not sacrificed for administrative convenience or political interests.

The judiciary's role has been especially significant in expanding the scope of Article 14 and strengthening its connection with other fundamental rights.

### **Contemporary Relevance**

The interrelationship between Articles 14 and 19 remains highly relevant in modern India. With rapid technological advancements, social media expansion, and increasing state regulation, questions regarding freedom of speech, privacy, and equality frequently arise.

Courts continue to rely on the principles established under these articles to strike a balance between individual freedoms and state interests. Issues such as internet restrictions, protest regulations, and professional freedoms are often evaluated using the combined tests of Articles 14 and 19.

This demonstrates the continuing importance of these provisions in safeguarding democratic values.

### **Personal Opinion**

In my opinion, the relationship between Article 14 and Article 19 forms one of the strongest pillars of constitutional democracy in India. Article 14 ensures fairness and equality in the exercise of state power, while Article 19 empowers citizens with the freedoms necessary to participate in democratic governance.

Without Article 14, the freedoms guaranteed under Article 19 could easily be manipulated or restricted arbitrarily by the state. Similarly, without Article 19, equality alone would not guarantee meaningful liberty for citizens.

The synergy between these provisions ensures that individuals not only enjoy freedoms but also receive equal treatment under the law. In a diverse country like India, where differences in culture, language, and social status exist, this constitutional balance becomes even more

important.

The active role of the judiciary in interpreting and enforcing these rights further strengthens this framework, making it possible for citizens to challenge unjust laws and protect their freedoms.

### **Conclusion**

The interrelationship between Article 14 and Article 19 represents a vital aspect of the Indian constitutional framework. While Article 14 guarantees equality and protection against arbitrary state action, Article 19 ensures the preservation of essential freedoms that are necessary for the functioning of a democratic society.

Together, these provisions create a balanced system in which individual rights are protected while allowing the state to maintain public order and social welfare. Judicial interpretations, particularly in landmark cases such as *Anwar Ali Sarkar*, *E.P. Royappa*, and *Maneka Gandhi*, have reinforced the idea that these articles must be read together to fully safeguard fundamental rights.

The continued vigilance of the judiciary and the commitment of democratic institutions are essential to preserving this relationship. As India continues to evolve socially, politically, and technologically, the principles embodied in Articles 14 and 19 will remain central to the protection of individual rights and the preservation of constitutional democracy.

**Endnotes**

1. Constitution of India, Article 14.
2. Constitution of India, Article 19(1).
3. State of West Bengal v. Anwar Ali Sarkar, AIR 1952 SC 75.
4. Keshava Nanda Bharati v. State of Kerala, AIR 1973 SC 1461.
5. E.P. Royappa v. State of Tamil Nadu, AIR 1974 SC 555.
6. Maneka Gandhi v. Union of India, AIR 1978 SC 597.