

PRINCIPLES OF FAIR HEARING WITH RESPECT TO RULES OF NATURAL JUSTICE UNDER ARTICLE 14 AND 21 OF THE CONSTITUTION

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ABSTRACT

Natural Justice denotes certain specific procedural rights under the English Legal System and other nations. It is considered to be the second main branch of natural justice which protect the people from arbitrary administrative actions where his right to person and property is jeopardized. The main aim of giving fair hearing in the application of principle of natural justice is to see that no illegal action or any illegal decision takes place. This paper talks about the main concept of natural justice. The Principles of Natural justice have been developed and it is being followed by the judiciary to protect all the rights of the public against these arbitrariness of certain administrative authorities. The Administrative actions are linked directly to adjudication and these administrative adjudication can be defined as Judicial decision that is derived from the existence and application of enabling provision. a tribunal is a body which discharges certain judicial functions, in that sense not only that is occasionally taking decisions as to individuals rights, but which is specially set up for the purpose of adjudication. The Principles of Natural Justice developed by courts to secure fairness in Judicial functions and principles are the common law. In administering Justice the courts are required to uphold principles of procedural fairness or natural justice. The aim is to assess the procedure of the recent Sri Lanka and to provide a substantive legal critique of the conflict of interest which provides general introduction to recent commision. This paper

emphasises the concept of natural justice and implies fairness, reasonableness, equity and equality.

KEYWORDS: Administration, Illegal, Judiciary, Legal, Natural Justice, Procedural Rights.

INTRODUCTION

In current administration, greater administration is paid to the judicial review of administrative action. The judicial review of administration is intended to deal with general principles governing administrative action, orders, decision. The Administrative actions are linked directly to adjudication and these administrative adjudication can be defined as Judicial decision that is derived from the existence and application of enabling provision, which the statutory provision is were the legislature delegates powers to a person or body. The exercise of such delegated powers are based upon the assumption that, an individual or a certain group so charged uses its discretion in wielding such powers. Sometimes, the administrative adjudication affects the rights of an individual citizen. where the common law principles/rules of natural justice requires that an individual who is affected by a decision shall be given a fair hearing, and that he/she shall be informed of the case against him, given an opportunity to prepare and present his/her case.

The Principle or the rule of bias has two aspects in its side; An adjudicator must not have any direct or any kind of financial interest in the outcome of proceedings done; the adjudicator must not be reasonably suspected to show any kind of bias.

Hence, a tribunal is a body which discharges certain judicial functions, in that sense not only that is occasionally taking decisions as to individuals rights, but which is specially set up for the purpose of adjudication. Therefore these in public administration or in constitutional or administrative law should be aware of the practice of principles of Natural Justice.

Aim of the study :

The aim of the paper is to analyse the concept of natural justice and implies fairness, reasonableness, equity and equality.

RESEARCH PROBLEM

- **RESEARCH QUESTION** - How does the Principles of Fair hearing intervenes with the provisions of the Constitution?

PROBLEM: Every one of them accused of a crime should have their guilt or innocence to be determined by a fair legal process.

INTERVENTION: How Article 14 and 21 intervenes with the provisions of the constitution?

COMPARISON: Principles of fair hearing between India and USA

OUTCOMES: Were the individual will have an opportunity to present evidence to support his/her cause.

REVIEW OF LITERATURE

1. **Arthur Chaskalson [2008]**. Policies of the U.S. developed in response to the threat of terrorism have been criticized. A crucial issue because of the impact that such policies can have on the political will. The exception becomes the rule, the temporary becomes permanent. Directed to the right to fair hearing. (Chaskalson 2008)

2. **Verma [2010]**. In India there is no statute laying down the minimum procedure which administrative agencies. In India, the role and Jurisdiction of administrative agencies is increasing at a rapid rate. In absence of statutory provision the importance of Judicial decision of Supreme Court having binding effect.(Verma 2010)

3. **Issack [2016]**. This paper seeks to analyse the concept of recusal as a coronary to the constitutional right of fair hearing. Illuminated by the ideals of which our Judicial system aspires. The concept have fairly crystalised the Kenyan courts, specifically the Supreme Court. (Issack 2016)

4. **Rustam Singh Thakur [2002]**. The Principles of Natural Justice developed by courts to secure fairness in Judicial functions and principles are the common law. The doctrine of Natural Justice pervades for procedural law of arbitrariness fair play in action. (Thakur and Soni 2011)

5. **Stolleis [2004]**. This paper tries to examines the basic responsibility of an administrative law to judge by conducting the hearing in a fair manner and ensuring an orderly and fair presentation of each evidence with responsibilities at each stage of the proceeding and by conducting a hearing to give a clear impression.(Stolleis 2004)

6. **Dr. Mathew Groves [2009]**. Rule against bias are considered to be two pillars of Natural Justice were by hearing rules it governs the procedural features of all kinds of decision making fair minded and informed observer for subjective views like for a Judges applying doctrine. (Groves and Lee, n.d.)

7. **Charles G. Geyh [2012]**. A procedural dimension without impartiality promotes public confidence and ethical dimension in impartiality affords parties a fair hearing for standard of good conduct core and Judge's self definition to impartial enough to assure parties a fair hearing. (Geyh 2012)

8. Public interest in the administration of Justice requires access to Justice for all. Justice must be meaningful access were the decision makers ensures that Judges have resources they need to render fully. Changes are required to achieve standard decision. (United States. Congress. House. Committee on the Judiciary. Subcommittee on Courts, Liberties, and Justice 1977)

9. **Jernej Letnar [2014]**. Right to fair trial is considered to be one of the backbones to rule of law for the protection of human rights and the right to fundamental freedoms and for rightly examining fair trial by guaranteeing and exercising it before the court of arbitration. (Letnar Cernic and Cernic 2014)

10. **Tracey Booth [2015]**. Well established feature of contemporary sentencing hearings by Common Law Jurisdictions for non - legal nature and functioning of sentencing hearings with inconsistent with established legal values detrimental to offenders to fair hearing. (Booth 2015)

11. The right of access to Justice which is embodied in right to fair hearing Civil Justice System Common Law Jurisdiction Common problems of long delays and Jurisdictions have introduced major reform to Civil Justice. (United States. Congress. House. Committee on the Judiciary. Subcommittee on Courts, Liberties, and Justice 1977)

12. **Arthur Chaskalson [2008]**. Execution becomes the rule temporary becomes permanent fairness and due process of right of fair hearing seeks to change the content of established principles of human Rights. (Chaskalson 2008)

13. **Sadam Issack [2016]**. Analyses the concept of recusal as coronary to constitutional right of fair hearing. Independence of Judges is Paramount and Proper dispensation of Justice and Judge's impartiality. Principles guiding this concept criticized. (Issack 2016)

14. The aim is to assess the procedure of the recent Sri Lanka and to provide a substantive legal critique of the conflict of interest which provides general introduction to recent commission of Inquiry Presidential warrant. (United States. Congress. House. Committee on Education and Labor. Subcommittee on Select Education 1980)

15. **Vicki Lens [2008]**. This Article explores how welfare clients use and experience the fair hearing system, the administrative mechanism challenging denials and aid to public welfare bureaucracies in the United States. (Lens 2008)

16. **Rustam Singh Thakur [2011]**. Doctrine of Natural Justice means fair play in action to constitute the basic elements of a fair hearing, fair play and Justice. Preserves of any Particular race or country but shared in common by all men. (Thakur and Soni 2011)

17. **Toriola Oyewo [1987]**. In administering Justice the courts are required to uphold principles of procedural fairness or natural justice. These principles include ensuring hearings are conducted in open court and are fair and there is no bias. (Toriola Oyewo 1987)

18. **Utsav Mukherjee [2008]**. Numerous disadvantages to self representation retained an attorney to represent him during the proceedings and settlement is fair and equitable for self representing person. (Mukherjee 2008)

19. **Barry Sullivan [2016]**. This Essay states about the adjudication and adjudicatory process for constitutional law and courts. The due process equal hearing principles for the judges in judging and making judicial decisions and involving judicial process and judicial restraint for maintaining rule of law. (Sullivan 2016)

20. Basic responsibilities of an administrative law conducting the hearing and ensuring orderly fair evidence to be determined includes commencement of hearing opening presentation of proof receipt of testimony maintaining order and decorum. ("THE CONDUCT OF THE HEARING" 1953)

OBJECTIVES OF THE STUDY

- a) **To know** about the Principles of fair hearing
- b) **To analyse** about the rules of Natural justice
- c) **To study** about the provisions under the article 14 and 21 of the Constitution
- d) **To identify** the loop holes present in the law
- e) **To suggest** certain measures to uphold the Principles of fair hearing

HYPOTHESIS

H0: Principles of Fair hearing does not protect the right of public against arbitrariness

Ha: Principles of Fair hearing always protects the right of public against arbitrariness.

RESEARCH METHODOLOGY - MATERIALS AND METHODS

Doctrinal Research has been attempted in this paper.

Secondary Sources have been used in this paper.

Reference books and E- sources have been considered for research purpose.

Uniform Style of Citation has been used in this paper.

RESULT - How the Justice is being recognised under Article 14 and 21 of the Constitution.

STUDY DESIGN

RIGHT TO A FAIR HEARING

PROCEDURAL JUSTICE

NATURAL JUSTICE IN THE COMMON LAW

RIGHT TO A FAIR HEARING

It is fundamental to fair procedure that during a fair hearing both sides should be heard. This right to fair hearing requires that individuals are not penalized by certain decisions which tend to affect their rights or certain legitimate expectations. Besides

promoting Associate in Nursing individual's liberties, the correct to a way hearing has conjointly been employed by Courts as a base on that to make up truthful body procedure. it's currently well established that it's not the character of the general public authority that matters however the character of the ability exercised.

However, in the United Kingdom prior to **Ridge v. Baldwin**³, the scope of a right to a fair hearing was severely restricted by case law following **Cooper v. Wandsworth Board of Works**⁴. This was seen in cases such as **Local Government Board v. Arlidge**⁵ and **R. v. Leman Street Police Station Inspector**⁶. In **R. v. Electricity Commissioners**⁷, Lord Atkin observed that "the right only applied where decision-makers had the duty to act judicially". In natural justice, this dictum generally means that a duty to act judicially was not to be inferred merely from the impact of a decision on the rights of subjects were such a duty would arise only if there was express obligation to follow a judicial-type procedure in arriving at the decision.

In the case of **Ridge v. Baldwin**, It was stated that, the authorities had extensively and attacked the problem at its root by demonstrating how this term of judicial has to be misinterpreted as requiring. This removing of earlier misconception meaning Judicial is meant to have given the flexibility to the judiciary for it needed to involve and intervene in all the cases of judicial review. It is the mere fact that the decision makers are conferred with wide discretion by law and is not a reason enough for the requirements of natural justice.

In **Ahmed v. H.M. Treasury**⁸, the treasury has exercised certain powers to freeze the appellants by financial assets and certain economic resources on the ground that it has reasonably suspected to be that appellants were or might be certain persons who had willingly committed or facilitated in the commission of terrorism. The Supreme Court of United Kingdom has held that, since the Al-qaida order has made no provision for basic and procedural fairness, it has effectively deprived the rights of people and their fundamental rights and declared ultra vires. There has been a fixed penalty scheme in order to penalize carriers for bringing Clandestine entrants into the U.K. which has been held to be criminal, since the objective of the scheme was to deter dishonesty and carelessness. This is primarily

³ [1964] A.C. 40 2

⁴ (1863) 14 CB (NS) 180

⁵ [1915] AC 120

⁶ (1975) 62 Cr App R 53

⁷ [1924] 1 K.B. 171 at 205

⁸ [2010] UKSC 2

applicable to any judicial proceedings which may further be seen as a requirement that any Judgment shall be pronounced publicly and that all the circumstances of each case should be investigated. It has been held that the Commission is to be inapplicable on the grounds that there has been no determination of the applicants' civil rights and obligations regarding immigration and deportation, entitlement to tax benefits, the payment of discretionary grants etc and the revocation of a licence by the Parole Board.

It has been stated that it is not enough to protect procedural process, and only with the development of even more sophisticated common law along with the protection of procedural due process which may extend further into the administrative machine. The common law does not try to impose a general duty where to actually give certain reason for certain decisions, but a good decision-maker must always give a reasoned judgment so that in order to enable an affected individual he has to decide whether to appeal it or not. **Article 6(1) of the European Convention on Human Rights**, having legal effect under the **Human Rights Act, 1998**, is now supplementing the common law of procedural justice in many of the administrative cases, even though this Article was originally limited to certain judicial determination of private law matters. This always provides for a fair and for public hearing by an independent and most impartial tribunal which has to be established by law. The judges have to be developed and continuing to develop with certain techniques that later will ensure that the Conventions are always flexibly applied.

Administrators should be certainly tempted to regard certain procedural restrictions, which were invented by lawyers, regarding as an obstacle to efficiency. It is always true that the rule of natural justice restricts the freedom of administrative action and that their observance costs certain amount of time and money. But time and money are more likely to be well spent if they tend to reduce friction in the machinery of government, and it is more likely because they are essentially rules for upholding fairness and to reduce grievances that the rules of natural justice can be said to promote efficiency. The courts do not let them run riot, and keep in touch with the standards of good administration. Any decision which is made without bias, and with prior and proper consideration of the views of those affected by it will also be of better quality. Justice and efficiency go hand in hand.

PROCEDURAL JUSTICE

By developing the principle relating to natural justice, the Courts have already devised a kind of code of fair administrative procedure. They can control the substance of what public authorities do by means of certain rules which are relating to reasonableness, improper purposes. The principles of natural justice, can control the procedure by which they can do it. They are entitled to take this further step, thereby trying to impose a particular technique of procedure on government departments and statutory authorities generally. They have provided doctrines which considered to be an essential part of any system of administrative justice. Natural justice actually plays in process of law in the Constitution. It has a wide application in various areas in administrative discretionary power. Wider the powers in the state, the extensive discretion it confers. It is always possible for them to require to be exercised in a procedurally fair manner.

Procedure is not considered a matter of secondary importance. As these governmental powers grow more in an enormous way, this procedural fairness are rendered tolerably. These legislation controls the large extent of expropriation without any compensation. Procedural fairness is considered to be regularly the indispensable essence of all kinds of liberty. Many substantive laws have been endured and sometimes impartially applied. This history of liberty has to be of procedural safeguards.

This Natural justice is considered to be a well-defined concept which comprises of two fundamental rules of fair procedure: They are

- That a man may not be a judge in his own cause
- That a man's defence must always be fairly heard

There are broad and narrow aspects to consider this issue. The narrow aspect consists the rules of natural justice which are merely considered to be a branch of principles of ultra vires. Violation of natural justice is to be classified as in one of the varieties of wrong procedure, or abuse of power. **Spackman v. Plumstead District Board of Works**⁹, "There would be no decision taken within the meaning of the statute if there be anything of those things done contrary to the essence of natural justice". Thus violating natural justice will make this decision taken void, and considered ultra vires. The rules of natural justice thus

⁹ 1863 143 ER 414

operates as an implied mandatory requirements, which has non-observance of which invalidates the exercise of this power.

When the special powers to take action or to decide disputes are vested in administrative bodies there is a legal procedure which can never be shaken off. The judges have long been concerned of this problem. Rules of common law, became in effect presumptions which is to be used in the interpretation of statutes, which are developed and refined for the rules of natural justice over a period of time. They have to be flexibly applied and their precise content depends on these circumstances.

NATURAL JUSTICE IN THE COMMON LAW

The procedural rules are required to impartial adjudicators and fair hearings which can be traced back to the medieval precedents, and, they indeed, were not known in the ancient world. In the medieval period they were regarded as certain part of theory even in the power of legislature could not alter them. This procedural theory lingered into the seventeenth and eighteenth century. The Court declared an Act of Parliament void if it made a man judge in his own cause. The statute under which the College acted provided that fines should go half to the College, so that the College had a financial interest in its own judgment and was judge in his own cause.

Natural Justice, the law of God and common right and reason were all the aspects of the old concept of fundamental and unalterable law. They are no longer representing any kind of limit to the power of these statute. Natural Justice has to look for a new method and has found it as a mode not of destroying and enacted the law but of fulfilling it. Its basis as of now is in the rules of interpretation. The Courts had presumed that Parliament, when it grants powers, intends them to be exercised in a right and to proper way. Where there are wide powers of decision-making which are conferred by statute. It has been presumed that Parliament implicitly requires the decision to be made in accordance with the rules of natural justice. This allows all considerable scope for the courts to devise a set of canons of fair administrative procedure, which is suitable to the needs of the time.

The courts will also apply similar doctrines during the interpretation of statutes. The members of trade unions or clubs cannot normally be expelled without being given a hearing, for which their contracts are of membership and are held to be included a duty in order to act

fairly whereby accepting them as members and receiving their subscriptions, the trade union or club impliedly undertakes to treat them fairly and in accordance with the rules. The principles of fair procedure may be similar to those applied in the administrative law and the decisions may be helpful.

In **Sur Enamel and Stamping Works Ltd. V. Their Workmen**¹⁰, it was held that “It must be clearly understood that, the mere form of an enquiry would not at all be enough to satisfy all the requirements of industrial law and would not protect the action taken by the employer from this challenge, if in this substance, the enquiry is not fair and proper. An enquiry cannot be said to have been properly held unless that the employee has proceeded against has been informed clearly of the charge which was levelled against him. The witnesses are also examined in the presence of the employee in respect of these charges. The employee is found to be given a fair opportunity to cross-examine the witnesses. They have been given a fair opportunity to put up his defence. The enquiry officer records his findings with reasons for the same in his report. “It goes without saying anything that it is of the essence of any enquiry were a person accused of an offence should be told clearly and specifically of the offence with which it is intended to charge him and he must not at all be condemned unheard”. In **Gurgaon District Ex-Servicemen Motor Transport Co-operative Society v. Nawal Singh**¹¹, the respondent did not have any opportunity of being heard in any relation to the enquiry which was held. There was no charge sheet made against him, and there was not one enquiry in his presence. He was not allowed to cross examine any of the witnesses and he had no opportunity to put forward his defense. It was also held that it could hardly be called an enquiry into the conduct of respondent and stood vitiated on that account.

RECOMMENDATIONS

- (a) There should be an equality of arms between the parties to a fair proceedings, whether they be administrative, civil, criminal, or military or any other
- (b) There should be equality for all persons before any kind of judicial body without any distinction whatsoever as in regards race, colour, age, religion, creed, language, political or other convictions, national or social origin, means, disability, ethnic origin, sex, gender, birth, status or other circumstances;

¹⁰ [1963] 2 L.L.J.78

¹¹ [1962] 1 S.C.R. 978

- (c) There should be equality of access by both women and men to any judicial bodies and there should be equality before the law in any kind of legal proceedings;
- (d) There should be respect for the inherent dignity of all human persons, especially of the women who are participating in legal proceedings and as complainants, witnesses, victims or accused;
- (e) There should be adequate opportunity to prepare any case, to present arguments and for evidence and to challenge or to respond to opposing arguments or any kind of evidence;
- (f) There should be an entitlement to consult and be represented by a legal representative or other qualified persons or chosen by the party at all stages of the proceedings;
- (g) There should be an entitlement to the assistance of an interpreter in case if he or she cannot understand or to speak the language used in or by the judicial body;
- (h) There should be an entitlement to have a party's rights and all other obligations which is affected only by a decision which is based solely on all evidence presented to the judicial body;
- (j) There should be an entitlement to an appeal or to any higher judicial body.

CONCLUSION

In a democratic country, where the administrative law contains a very important part of rules and principles, the three fundamental principles/rules of natural justice that should be adhered to by an administrative tribunal includes

- a) No man should act as a judge in his own cause
- b) both sides to a dispute should be heard
- c) the rule against bias should be complied with

It is very important to note that any of the decision which if violates the natural justice would be found on the face null and void, and hence one must always keep in mind that the doctrine of natural justice is very important for any administrative decision to be valid. It must also be recollected that every right to fair hearing and a single judge not adjudicating over a matter in which he has an interest. The extent and application of the rules under principles of natural justice cannot be imprisoned with a rigid formula. The application under the doctrine depends

on the nature of the jurisdiction which are conferred on the administrative authority and relies upon the character of the rights of the person affected.

Hence, fairness must be present in public administration.

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