Doctrine Of Reasonable Classification

Background:
Doctrine of reasonable classification has been originated from Article 14 of Indian Constitution. Article 14 is a fundamental right to equality to every citizen in the country. It is one of the most important provisions of the constitution as it provides equality to all the people within the territory of India.

It protects against any discrimination on grounds of religion, caste, race, gender, place of birth. There are two features under Article14 - Equality before the law and Equal protection of the law. Earlier, a reasonable classification test was conducted which tested whether there is reasonable classification in the legislation i.e. the test was held to check the constitutionality.

Genesis:
Article 14 of the Indian Constitution states 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. It can be conferred from this statement that no one is above the law of the land and the Rule of Law shall prevail as all are equal in the eyes of law. But this rule is not absolute and is subject to many exceptions.

The Rule of Law cannot prevent a certain class of persons from being subject to special laws, hence, the State has the power to make laws operating differently on different classes of people, in a way that the principle of equality of civil rights and equal protection of law is followed. This is being known as the **'Doctrine of Reasonable Classification'**.

Article 14 permits **Reasonable Classification** and not **Class Legislation**. Class Legislation means making of improper discrimination by conferring certain privileges upon a class of persons arbitrarily selected from a huge number of people. Thus, Class legislation violates equal protection whereas, Reasonable Classification is always based on real and substantial distinction.

Case Law:
In **Ram Krishna Dalmia v. Justice S.R. Tendolkar**, AIR 1958, the Supreme Court held that:
It is now well established that while Article 14 forbids class legislation, it does not forbid reasonable classification for the purposes of legislation. It condemns discrimination not only by a substantive law but also by a law of procedure.

Hence, Article 14 forbids the class legislation but it does not forbid reasonable classification, however, these classifications must not be **'arbitrary, artificial or evasive'**.

In the case of **State of West Bengal v. Anwar Ali Sarkar**, the Supreme Court of India, stated the twin test for reasonable classification. The court held that for the classification to pass the test, two conditions must be fulfilled:
  i. Classification must be founded on an intelligible differentia which distinguishes those that are grouped together from others and
  ii. The differentia must have a rational relation to the object sought to be achieved by the Act.

Relevance:
The court said that:
The differentia which is the basis of the classification and the object of the act are distinct things and what is necessary is that there must be a nexus between them i.e. the object of the law and the grouping.

The doctrine of reasonable classification is mere judicial test to determine whether there is arbitrariness in the state action if the state action in question does not pass the test as laid down by the doctrine it is considered arbitrary and since it is arbitrary it will be unconstitutional as per the principles of article 14. This ensures that people similarly situated are treated equally.

Conclusion:
There is a necessity of the reasonable classification for the progress of society. The Supreme Court has maintained that Article 14 permits the reasonable classification of persons and objects by the State for the purpose of achieving things that would help in the development of the society.

Article 14 does not mean that all laws must be general or same laws should be applied to everyone. Every law cannot have universal application. This is because each person is not same. There can be a difference between each other through nature or circumstances. Further, the identical treatment in unequal circumstances would amount to inequality. For eg, the same tax amount cannot be implied on a rich person as well as poor person i.e. the tax amount shall vary according to their economic status.

Hence, there should be differential treatment on the basis of reasons and rationality. The State can treat different persons differently if circumstances justify such treatment. Thus, the doctrine of reasonable classification is not an exception to the right of equality but instead it protects this right.

Therefore, Doctrine of Reasonable classification is important in this respect, but, at the same time, the Courts and the Government must ensure that such classification is reasonable and free from any arbitrariness.