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NEMO JUDEX IN CAUSA SUA: DOCTRINAL EVOLUTION, THE DICHOTOMY OF BIAS, AND THE SEARCH FOR IMPARTIALITY IN MODERN ADMINISTRATIVE ADJUDICATION

Umashankar Pandey
Advocate, District & Sessions Court, Sonbhadra, India

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Abstract

The doctrine of natural justice forms the ethical and constitutional spine of public law across common law jurisdictions. At the core of natural justice lies the ancient Roman maxim 'nemo judex in causa sua'—no person shall be a judge in their own cause. Rooted in the fundamental necessity to maintain public confidence in the administration of justice, the rule against bias mandates not merely that judicial and administrative adjudicators be impartial in fact, but that they be free from any reasonable suspicion of bias. This paper presents an exhaustive doctrinal and comparative analysis of the rule against bias across common law and Indian administrative jurisprudence. Commencing with an ontological examination of the maxim, the study traces its lineage from Sir Edward Coke's historic ruling in Dr. Bonham's Case (1610) to Lord Cottenham's disqualification in Dimes v. Grand Junction Canal (1852) and Lord Hewart's celebrated aphorism in R v. Sussex Justices ('justice should not only be done, but should manifestly and undoubtedly be seen to be done'). The paper deconstructs the conventional typology of bias into four major categories: pecuniary bias, personal bias, official/subject-matter bias, and preconception or policy bias. It critically evaluates the protracted judicial debate surrounding the appropriate evidentiary threshold for disqualification: the tension between the 'real likelihood of bias' test and the 'reasonable suspicion of bias' test, tracing their evolution through English authorities (Metropolitan Properties v. Lannon; R v. Gough; Porter v. Magill) and landmark Indian precedents (Manak Lal v. Prem Chand Singhvi; A.K. Kraipak v. Union of India; Gullapalli Nageswara Rao; Ranjit Thakur v. Union of India). Furthermore, the paper investigates the limits and modern exceptions to the rule, critically interrogating the 'doctrine of necessity' (Charan Lal Sahu; Election Commission of India v. Dr. Subramanian Swamy), absolute necessity vs. statutory necessity, waiver, and the effect of institutional bias in regulatory bodies. The study concludes by articulating a synchronized, objective model of adjudicatory fairness, demonstrating that the rule against bias remains an indispensable constitutional guarantee under Article 14 against executive arbitrarines

Keywords: ***Nemo Judex In Causa Sua, Rule Against Bias, Natural Justice, Administrative Law, Real Likelihood of Bias, Reasonable Suspicion, Pecuniary Bias, A.K. Kraipak, Doctrine of Necessity, Article 14.***

1. INTRODUCTION: IMPARTIALITY AS THE LIFEBLOOD OF ADJUDICATIVE LEGITIMACY

The legitimacy of any judicial, quasi-judicial, or administrative adjudicative system does not rest solely upon the legal accuracy of its final determinations. Far more fundamentally, it rests upon public faith in the integrity, detachment, and uncompromised neutrality of the decision-maker. If the public perceives that the scales of justice are tilted by covert interest, personal animus, financial entanglement, or preconceived institutional bias, the moral authority of the law collapses. It is for this reason that common law jurisprudence elevated the principles of natural justice (jus naturale) to the status of fundamental constitutional imperatives.

Natural justice traditionally rests upon two foundational pillars: audi alteram partem (hear the other side / the right to a fair hearing) and nemo judex in causa sua (no one should be a judge in their own cause). While audi alteram partem ensures procedural fairness for the litigant, nemo judex in causa sua protects the systemic integrity of the adjudicative seat itself. The rule against bias is not an ornamental canon; it is a prophylactic shield against human frailty, recognizing that when personal, financial, or institutional self-interest enters the judicial calculus, objective truth is inevitably compromised.

With the explosive rise of the contemporary administrative state, the application of nemo judex in causa sua has faced unprecedented challenges. Unlike traditional common law courts, modern administrative tribunals, statutory boards, and departmental inquiry officers are embedded within the executive apparatus. Executive officials are routinely charged with policy formulation, regulatory enforcement, prosecution, and adjudication within the same administrative silo. This convergence of functions makes strict judicial detachment difficult to maintain. This paper provides an in-depth doctrinal inquiry into the historical foundations, modern typology, evidentiary standards, exceptions, and contemporary relevance of the rule against bias in Indian and comparative public law.

2. HISTORICAL AND JURISPRUDENTIAL FOUNDATIONS OF THE MAXIM

A. The Common Law Genesis: From Bracton to Dr. Bonham's Case (1610)

The conceptual origin of nemo judex in causa sua (sometimes expressed as nemo debet esse judex in propria causa) traces back to Roman legal philosophy, canon law, and medieval scholastic treatises. Henry de Bracton, in the thirteenth century, noted that a judge could not sit in judgment over an issue where he had a direct personal stake. However, the definitive constitutional elevation of the maxim occurred in the historic pronouncement of Sir Edward Coke, Chief Justice of the Court of Common Pleas, in Dr. Bonham's Case (1610) 8 Co. Rep. 113b.

Dr. Thomas Bonham, a doctor of medicine of Cambridge University, was fined and imprisoned by the Royal College of Physicians for practicing medicine in London without their statutory license. Under the Royal Charter and supporting statutes, half of all fines imposed on unlicensed practitioners were paid directly into the coffers of the College of Physicians itself. Striking down the imprisonment as unlawful, Coke C.J. delivered his celebrated constitutional dictum:

"The censors cannot be judges, ministers, and parties; judges to give sentence or judgment; ministers to make summons; and parties to have the moiety of the forfeiture, quia aliquis non debet esse judex in propria causa, imo est iniquum aliquem suae rei esse judicem: and it appears in our books, that in many cases, the common law will controul Acts of Parliament, and sometimes adjudge them to be utterly void: for when an Act of Parliament is against common right and reason, or repugnant, or impossible to be performed, the common law will controul it, and adjudge such Act

to be void."

Coke's pronouncement was revolutionary. It declared that even an Act of Parliament could not lawfully authorize a tribunal to sit as a judge in its own financial cause, because doing so violated fundamental reason and natural justice. While English constitutionalism later subordinated Coke's common law supremacy to absolute Parliamentary Sovereignty, Dr. Bonham's Case permanently embedded the rule against pecuniary bias into the bedrock of public law.

B. The Automatic Disqualification Rule: Dimes v. Grand Junction Canal (1852)

The strictness of the rule against financial bias was reaffirmed by the House of Lords in the monumental case of Dimes v. Grand Junction Canal (1852) 3 H.L.C. 759. In that litigation, Lord Chancellor Cottenham affirmed several decrees in favor of the Grand Junction Canal Company, an entity in which he held a substantial personal shareholding (several thousand pounds). There was no allegation that Lord Chancellor Cottenham was actually influenced by his shareholding; his integrity was universally respected.

Nonetheless, the House of Lords set aside Lord Cottenham's decrees. Lord Campbell delivered a classic speech establishing the doctrine of 'automatic disqualification' in cases of pecuniary interest:

"No one can suppose that Lord Cottenham could be, in the remotest degree, influenced by the interest he had in this concern; but, my Lords, it is of the last importance that the maxim that no man is to be a judge in his own cause should be held sacred. And that is not to be confined to a cause in which he is an actual party, but applies to a cause in which he has an interest... This will be a lesson to all inferior tribunals to take care not only that in their decrees they are not influenced by their personal interest, but to avoid the appearance of labouring under such an influence."

Dimes firmly established that where an adjudicator possesses a direct pecuniary interest in the subject matter, the law brooks no inquiry into whether actual bias was present. Disqualification is automatic, absolute, and independent of any proof of actual prejudice.

C. The Imperative of Public Appearance: Lord Hewart's Maxim in Sussex Justices

The transition of the rule from protecting against subjective corruption to safeguarding public confidence reached its zenith in Rex v. Sussex Justices, ex parte McCarthy [1924] 1 K.B. 256. McCarthy was prosecuted before the Sussex magistrates for dangerous driving arising out of a road collision. The acting clerk to the justices was a partner in a firm of solicitors that had been retained by the opposing party to initiate civil proceedings against McCarthy for damages arising out of the same accident. At the close of the evidence, the clerk retired with the magistrates to their consultation room. The magistrates unanimously affirmed that they did not consult the clerk and reached their guilty verdict independently.

The High Court quashed the conviction. Lord Hewart, Lord Chief Justice of England, authored what is arguably the most famous aphorism in the history of administrative law:

"It is not merely of some importance but is of fundamental importance that justice should not only be done, but should manifestly and undoubtedly be seen to be done... The question therefore is not whether in this case the deputy clerk made any improper observation to the justices, but whether from the outside it might appear to a reasonable onlooker that he had the opportunity and potential inclination to do so. Nothing is to be done which creates even a suspicion that there has been an improper

interference with the course of justice."

3. THE TYPOLOGY OF BIAS IN ADMINISTRATIVE AND JUDICIAL PROCEEDINGS

In contemporary administrative law, bias is categorized into four distinct doctrinal species, each governed by specific legal standards:

A. Pecuniary Bias: The Strict Liability of Judicial Ethics

Pecuniary bias represents the oldest, most absolute category. Any direct financial interest—no matter how small or seemingly trivial—automatically disqualifies an adjudicator. As the Supreme Court of India observed in Manak Lal v. Prem Chand Singhvi, AIR 1957 SC 425, in cases of pecuniary bias, the law presumes disqualification without requiring any proof of actual injustice. Whether the judge owned ten shares or ten thousand shares, the automatic disqualification rule formulated in Dimes applies inexorably.

B. Personal Bias: Friendship, Enmity, and Kinship

Personal bias arises from relational dynamics existing between the adjudicator and a party to the proceedings. It encompasses intimate friendship, family kinship, commercial partnership, professional rivalry, or bitter personal enmity. Unlike pecuniary bias, where disqualification is automatic upon proof of interest, personal bias requires an assessment of whether the relational link is of such nature and intensity as to cloud the adjudicator's impartiality.

In Indian jurisprudence, the seminal authority is the Constitution Bench decision in A.K. Kraipak v. Union of India, (1969) 2 SCC 262. In that case, one Naqishbund, the acting Chief Conservator of Forests of Jammu & Kashmir, was a member of the selection board constituted to select state forest officers for induction into the newly created Indian Forest Service. Crucially, Naqishbund was himself a candidate for selection, competing directly against other senior colleagues whose service records were evaluated by the board. Although Naqishbund recused himself when his own name was formally considered, he participated in deliberations regarding all other competing candidates.

The Supreme Court struck down the entire selection list. Justice K.S. Hegde held that natural justice applies to administrative proceedings just as it applies to quasi-judicial determinations:

"The aim of the rules of natural justice is to secure justice or to put it negatively to prevent miscarriage of justice... The line between an administrative power and a quasi-judicial power is quite thin... It is difficult to believe that Naqishbund could have been entirely neutral when his own career was at stake. In a group deliberating upon selections, the presence of an interested person inevitably influences the collective mind. The real likelihood of bias was self-evident."

Similarly, in State of Uttar Pradesh v. Mohammad Nooh, AIR 1958 SC 86, the presiding officer conducting a departmental disciplinary inquiry against a police constable stepped down from the bench, took the witness stand to testify against the constable, and then resumed his seat as judge to convict the constable. Chief Justice S.R. Das characterized this procedure as an outrageous perversion of justice: 'a judge cannot combine the role of prosecutor, star witness, and adjudicator in the same breath.'

C. Official, Institutional, or Subject-Matter Bias

Official or departmental bias presents the most complex challenge in modern public law. In administrative governance, an official is frequently tasked by statute with formulating a policy, publishing a draft scheme, hearing public objections, and then issuing a final confirmation. Does the official's prior involvement in formulating the scheme disqualify them from

hearing objections on grounds of bias?

Indian courts addressed this delicate balance in the celebrated Gullapalli cases. In Gullapalli Nageswara Rao v. APSRTC, AIR 1959 SC 308 (Gullapalli I), the Andhra Pradesh Motor Vehicles Rules authorized the Secretary of the Transport Department to hear public objections against a nationalization scheme initiated by his own department, while the final decision was signed by the Minister. The Supreme Court struck down the hearing, holding that the Secretary—being the administrative head of the department that framed the scheme—suffered from departmental bias and could not act as an impartial judge of objections lodged against his own department's proposal.

However, in Gullapalli Nageswara Rao v. State of Andhra Pradesh, AIR 1959 SC 1376 (Gullapalli II), the state amended the rules so that the Minister in charge of Transport heard the objections and finalized the scheme. The Supreme Court upheld this procedure, ruling that a Minister, as a political and constitutional head executing statutory policy, does not suffer from personal or departmental bias merely by performing a statutory duty mandated by the legislature.

D. Preconception, Policy Bias, and Prejudgment

Preconception bias occurs when an adjudicator has publicly expressed such strong, uncompromising views on a specific controversy that an observer would conclude the matter has been prejudged before the hearing commenced. While public administrators are expected to possess policy preferences, an adjudicator cannot approach a statutory hearing with a closed mind.

In Franklin v. Minister of Town and Country Planning [1948] A.C. 87 (the Stevenage case), the Minister addressed a contentious public rally concerning the designation of Stevenage as a new satellite town. When the crowd jeered, the Minister shouted: 'It's no good your jeering, it's going to be done!' The House of Lords held that because the statutory function of designating a new town was purely administrative rather than judicial, the Minister was entitled to pursue government policy so long as he genuinely considered the report of the public inquiry.

However, where an adjudicator acts in a quasi-judicial capacity, prejudgment invalidates the proceeding. In Siemens Engineering & Manufacturing Co. v. Union of India, AIR 1976 SC 1785, the Supreme Court affirmed that quasi-judicial authorities must approach issues with complete intellectual detachment, giving reasoned orders that demonstrate an open and uncommitted judicial mind.

4. THE EVIDENTIARY THRESHOLD: 'REAL LIKELIHOOD' VERSUS 'REASONABLE SUSPICION'

For decades, common law and Indian courts wrestled with the precise semantic and evidentiary threshold required to invalidate an administrative decision on the ground of apparent bias. The debate coalesced around two competing legal tests:

1. The 'Real Likelihood of Bias' Test: Looking at all the facts, is there a substantial, demonstrated probability that the judge was biased? (A more objective, rigorous standard evaluated from the court's perspective).

2. The 'Reasonable Suspicion of Bias' Test: Looking at the circumstances, would a reasonable, fair-minded member of the public apprehend that the judge might be biased? (A perception-based standard evaluated from the standpoint of the reasonable citizen, reflecting Lord Hewart's maxim in Sussex Justices).

A. The English Doctrinal Evolution: From Lannon to Porter v. Magill

In Metropolitan Properties Co. (F.G.C.) Ltd. v. Lannon [1969] 1 Q.B. 577, Lord Denning M.R. attempted to synthesize both tests. A rent assessment committee presided over by a young solicitor fixed the rents of a block of flats at an

exceptionally low rate. It emerged that the solicitor lived with his father in another block owned by the same landlord, and the solicitor had recently acted for his father in a bitter dispute against that very landlord. Lord Denning held:

"In considering whether there was a real likelihood of bias, the court does not look at the mind of the justice himself or at the mind of the chairman of the tribunal... The court looks at the impression which would be given to other people. Even if he was as impartial as could be, nevertheless if right-minded persons would think that, in the circumstances, there was a real likelihood of bias on his part, then he should not sit... Surmise or conjecture is not enough. There must be circumstances from which a reasonable man would think it likely or probable that the justice, or chairman, would, or did, favour one side at the expense of the other."

After years of divergence—including the controversial House of Lords decision in R v. Gough [1993] A.C. 646, which prioritized the court's view—the UK House of Lords definitively unified the law in Porter v. Magill [2001] UKHL 67; [2002] 2 A.C. 357. Lord Hope of Craighead formulated the modern authoritative test:

"The question is whether the fair-minded and informed observer, having considered the facts, would conclude that there was a real possibility that the tribunal was biased."

This formulation harmonized English common law with European human rights jurisprudence under Article 6(1) of the ECHR, adopting the perspective of the 'fair-minded and informed observer.'

B. The Indian Jurisprudential Synthesis: Manak Lal, Kraipak, and Ranjit Thakur

In India, the Supreme Court early on adopted a nuanced version of the reasonable apprehension test. In Manak Lal v. Prem Chand Singhvi, AIR 1957 SC 425, a statutory disciplinary tribunal appointed by the High Court to inquire into allegations of professional misconduct against an advocate was chaired by a senior lawyer who had previously appeared as senior counsel for the complainant. Justice P.B. Gajendragadkar held:

"In dealing with cases of bias, the test is not whether in fact a bias has resulted in an improper decision; the test is whether there is a reasonable ground for assuming the possibility of a bias and whether it is likely to produce in the minds of the litigant or the public at large a reasonable doubt about the fairness of the administration of justice... What has to be seen is whether there is a reasonable apprehension in the mind of the litigant."

This approach reached maturity in the landmark court-martial case of Ranjit Thakur v. Union of India, (1987) 4 SCC 611. An army officer was sentenced to rigorous imprisonment and dismissed from service by a Summary General Court Martial presided over by an officer against whom the accused had previously sent a formal grievance alleging personal ill-will. Striking down the conviction, Justice M.N. Venkatachaliah formulated the definitive Indian standard:

"The test of likelihood of bias is whether a reasonable person, in possession of the attending circumstances, would have a reasonable apprehension of bias and not whether the adjudicator was in fact biased. The question is not whether the judge is biased, but whether there is a real likelihood of bias. As to the tests of the likelihood of bias what is relevant is the reasonableness of the apprehension in that regard in the mind of the litigant. The proper approach for the judge is not to look at his own mind and ask 'am I biased?' but to look at the mind of the party before him."

Thus, in Indian administrative law, the standard is unequivocally anchored in the reasonable apprehension of the litigant, judged from the

standpoint of an objective, reasonable person.

5. EXCEPTIONS TO THE RULE AGAINST BIAS: THE DOCTRINE OF NECESSITY

The rule against bias, while fundamental, is not without legal limitations. Where its rigid application would completely obstruct the course of justice or paralyze statutory governance, administrative law recognizes specific exceptions:

A. The Doctrine of Necessity: Preventing the Failure of Justice

The primary exception to nemo judex in causa sua is the 'doctrine of necessity.' An adjudicator who is otherwise disqualified on grounds of bias is legally permitted, and indeed required, to adjudicate if: (1) no other qualified adjudicator exists or can be legally constituted under the statute; (2) a quorum cannot be formed without the disqualified member; or (3) no alternative forum can grant relief. As the maxim salus populi suprema lex dictates, the total failure of justice is a greater constitutional evil than an adjudication tainted by potential bias.

The doctrine of necessity was authoritatively applied by the Supreme Court of India in the Bhopal Gas Disaster litigation: Charan Lal Sahu v. Union of India, (1990) 1 SCC 613. The Bhopal Gas Leak Disaster (Processing of Claims) Act, 1985 authorized the Central Government to represent all victims and settle claims against Union Carbide Corporation. The constitutional validity of the Act was challenged on the ground of bias, as the Central Government held a 22% shareholding in Union Carbide India Ltd. and was itself accused of regulatory negligence. A Constitution Bench upheld the statute, invoking the doctrine of necessity: no other entity possessed the financial capacity, sovereign stature, and logistical reach to litigate against a multinational corporation on behalf of hundreds of thousands of impoverished victims.

B. Necessity vs. 'Doctrine of Absolute Necessity'

In Election Commission of India v. Dr. Subramanian Swamy, (1996) 4 SCC 104, the Supreme Court drew a vital distinction between ordinary necessity and 'absolute necessity.' Chief Election Commissioner T.N. Seshan suffered from personal animus against Tamil Nadu Chief Minister J. Jayalalitha. When a disqualification petition was filed against Jayalalitha under Article 192 of the Constitution, Seshan claimed the exclusive right to tender the Election Commission's opinion to the Governor.

The Supreme Court rejected Seshan's plea of necessity. The Court ruled that because the Election Commission was a multi-member body, Seshan could recuse himself while the remaining two Election Commissioners rendered the binding opinion. The doctrine of necessity can only be invoked as a last resort of absolute indispensability; where an alternative mechanism is workable within the statutory framework, the rule against bias must prevail.

C. Statutory Exclusion and Express Parliamentary Mandate

Natural justice can be excluded by express statutory language or inevitable legislative implication. If a statute explicitly empowers a specific, named officer to formulate a scheme, investigate violations, and impose penalties, a party cannot raise official bias against that designated officer unless the parent statute itself is struck down as unconstitutional under Article 14.

D. Waiver: The Requirement of Prompt Objection

A litigant who is aware of an adjudicator's disqualifying interest but fails to raise a timely objection, choosing instead to participate in the proceedings and take the chance of a favorable outcome, is deemed to have waived the right to object. As held in Manak Lal and G. Sarana v.

University of Lucknow, (1976) 3 SCC 585, a party cannot keep a plea of bias in reserve to be deployed only after receiving an adverse decision.

6. NEMO JUDEX IN CAUSA SUA AND ARTICLE 14: CONSTITUTIONAL INTEGRATION

In Indian constitutional jurisprudence, the rule against bias has been elevated from a common law rule of administrative procedure into an inviolable fundamental right under Article 14 of the Constitution. Following the seminal decisions in E.P. Royappa v. State of Tamil Nadu, (1974) 4 SCC 3, and Maneka Gandhi v. Union of India, (1978) 1 SCC 248, the Supreme Court established that natural justice is the antithesis of arbitrariness.

In Maneka Gandhi, Justice P.N. Bhagwati affirmed that natural justice is a pervasive constitutional facet of Article 14. An administrative procedure that permits a biased adjudicator to decide public rights is inherently arbitrary, unreasonable, and violative of the guarantee of equal protection of the laws. Similarly, in Cantonment Board, Dinapore v. Taramani Devi, AIR 1992 SC 61, the Court reiterated that any order passed in violation of the rule against bias is void ab initio, being infected with constitutional illegality under Article 14.

7. CONTEMPORARY CHALLENGES: REGULATORY TRIBUNALS AND INSTITUTIONAL BIAS

The proliferation of modern regulatory authorities—such as the Competition Commission of India (CCI), Securities and Exchange Board of India (SEBI), Telecom Regulatory Authority of India (TRAI), and the Insolvency and Bankruptcy Board of India (IBBI)—has generated acute institutional friction with nemo judex in causa sua. In these regulatory bodies, the commission often functions simultaneously as the sector investigator, complainant, prosecutor, and final adjudicator.

In CCI v. SAIL, (2010) 10 SCC 744, the Supreme Court addressed whether the investigative and inquisitorial stages of the Competition Commission violated natural justice. The Court upheld the statutory bifurcation between the investigative wing (Director General) and the adjudicative commission, affirming that forming a preliminary prima facie opinion does not amount to bias. However, scholars and jurists continue to emphasize the necessity of maintaining strict Chinese walls between regulatory investigation divisions and adjudicative panels to prevent systemic institutional bias.

8. CONCLUSION: PRESERVING THE SANCTITY OF THE JUDICIAL SEAT

The ancient maxim nemo judex in causa sua remains the ultimate guardian of adjudicative credibility in democratic societies. From Coke's resistance to financial self-aggrandizement in Dr. Bonham's Case to modern constitutional review under Article 14, the doctrine has evolved from a narrow private law safeguard into a dynamic bulwark against bureaucratic authoritarianism.

The core insight of the rule against bias is that the integrity of the law depends as much upon the public appearance of justice as upon substantive justice itself. By enforcing automatic disqualification in pecuniary entanglements, applying the test of reasonable apprehension to personal bias, and confining the doctrine of necessity to cases of absolute indispensability, the judiciary ensures that the exercise of public power remains tethered to reason, impartiality, and the Rule of Law. In an era dominated by sprawling administrative machinery, nemo judex in causa sua serves as an enduring reminder: no authority, no matter how powerful or well-intentioned, can lawfully act as both prosecutor and judge in its

own cause.

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