

ANALYZING THE TRENDS OF INTERPRETATION OF STATUTES AMONG VARIOUS DOMAINS OF LAW

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INTRODUCTION

Statutes provide a systematic framework of rules and principles that govern diverse legal matters within a community, making them the cornerstone of legal systems around the world. Legislative bodies, like parliaments, carefully draft these laws, which are then endowed with the power of the state or other sovereign bodies. Statutes include a broad range of topics, including administrative processes, tax laws, and civil and criminal procedures.

Statutes are important because they are the main source of law in a specific area. They establish enforceable norms that corporations, individuals, and government bodies must follow. Through the representation of their chosen representatives, they formalize the will of the people as a whole, expressing public policy, social norms, and values.

To guarantee fair outcomes in the judicial system, accurate statutory interpretation is essential. Accurate interpretation supports the rule of law and aids in the just administration of justice by upholding legislative intent, fostering legal certainty, safeguarding individual rights, fostering fairness and equality, preventing abuse of power, and maintaining legal stability and predictability. Statutes that are interpreted precisely and clearly guarantee that laws are administered consistently, impartially, and in line with democratic ideals. This protects against unfair or capricious treatment and fosters public confidence in the legal system.

Research question: what is the trend in which courts interpret the statutes in different fields of law?

Research objectives: to find out the trend in which courts interpret statutes in different fields of law namely: Constitutional law, Criminal law, family law.

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STATUTORY INTERPRETATION PRINCIPLES

In order to determine the legislators' objective and guarantee that laws are applied correctly and uniformly throughout the legal system, statutory interpretation seeks to interpret and apply the meaning of legislative enactments, or statutes. Courts and other adjudicatory authorities aim to settle conflicts, protect individual rights, advance legal clarity, and make it easier to administer justice in conformity with accepted legal norms and community values by interpreting legislation. Literal interpretation of the statute is referred to as textual or rigorous interpretation, which entails interpreting its language in accordance with its common and literal meaning. This method ignores extrinsic elements like legislative purpose or policy goals in favor of concentrating just on the wording of the legislation. For example, *Union of India v. Sankalchand Himatlal Sheth*.¹

In this case, the Supreme Court of India interpreted Section 80 of the Code of Civil Procedure, 1908, which imposes certain conditions precedent for the institution of a suit against the government. The court strictly adhered to the literal wording of the statute, emphasizing that the conditions specified in Section 80 must be strictly complied with before a suit can be maintained against the government. The court held that failure to fulfill these conditions would render the suit incompetent, regardless of the equities involved or the consequences of such non-compliance.

This case illustrates the court's adherence to literal interpretation, emphasizing the importance of strictly adhering to the plain language of the statute, even if it leads to harsh outcomes or denies relief to parties.

On the other hand, Purposive interpretation is a tool commonly used in constitutional law to make sure that the interpretation of constitutional provisions aligns with the core values and concepts that the document upholds. Particularly when addressing new or developing social challenges, courts have the authority to go beyond the precise wording of the Constitution to ascertain the general intent underlying particular clauses. For example: In the case of *Maneka Gandhi v. Union of India* (1978), the Supreme Court of India applied purposive interpretation to Article 21 of the Indian Constitution, emphasizing its dynamic nature. The Court ruled that

¹ *Union of India v Sankalchand Himatlal Sheth* (1977) 2 SCC 349

the right to life and personal liberty extends beyond mere existence, encompassing a wide range of rights and freedoms essential for a meaningful life

CONSTITUTIONAL LAW

Constitutional interpretation in India is a dynamic field that plays a crucial role in upholding the principles of democracy, justice, and fundamental rights. Among the various methods of interpretation, the purposive rule stands out as a predominant approach, enabling courts to discern the framers' intent and give effect to the broader objectives of the Constitution. However, alongside this, the golden rule also finds relevance in constitutional adjudication, though used with caution. Through an examination of recent constitutional judgments, including those pertaining to the electoral bond scheme, demonetization, and LGBTQ+ rights, we can delve into the application of both the purposive and golden rules in shaping constitutional jurisprudence.

UNDERSTANDING LEGISLATIVE INTENT

A crucial aspect of constitutional interpretation lies in understanding the legislative intent behind constitutional provisions. This necessitates a comprehensive analysis of constitutional debates, deliberations, and framers' intentions, providing valuable insights into the underlying purposes and objectives of the Constitution.

In recent judgments, such as *Sita Soren v. Union of India*² and *Supriya Chakraborty & Anr. v. Union of India*³, the Supreme Court underscored the significance of discerning legislative intent while interpreting constitutional provisions. By delving into constitutional debates and historical context, the Court gained valuable perspective on the framers' intentions, guiding its interpretative approach.

Moreover, the Court's reliance on constitutional debates serves as a testament to the importance of studying the deliberative process underlying constitutional enactments. By examining the debates and discussions that preceded constitutional provisions, courts can elucidate the purposes and objectives sought to be achieved by the framers, thereby informing their interpretative decisions.

² *Sita Soren v Union of India* [2024] INSC 161 (4 March)

³ *Supriya Chakraborty and Another v Union of India* [2023] INSC 920

PURPOSIVE RULE IN RECENT CONSTITUTIONAL JUDGMENTS

In recent years, the Supreme Court of India has applied the purposive rule to interpret constitutional provisions, particularly concerning fundamental rights and governmental actions.

In *Sita Soren v. Union of India*⁴, the Court revisited the interpretation of Article 194 of the Constitution regarding parliamentary privileges. The Court emphasized a purposive approach, highlighting the need to restrict the broad powers conferred on Members of Parliament (MPs) and Members of Legislative Assemblies (MLAs). By overturning the precedent set in *P.V. Narasimha Rao v. State (CBI/SPE)*⁵, the Court underscored the importance of discerning legislative intent and aligning interpretations with constitutional values.

Similarly, in *Supriya Chakraborty & Anr. v. Union of India*⁶, the Court grappled with the question of the right to marriage for LGBTQ+ individuals. While acknowledging the absence of a fundamental right to marriage, the Court applied a purposive interpretation, recognizing the societal discrimination faced by the LGBTQ+ community. The Court emphasized the broader objectives of equality and dignity enshrined in the Constitution, advocating for legislative action to address discriminatory practices.

THE GOLDEN RULE AND CONSTITUTIONAL INTERPRETATION

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The golden rule, though less frequently invoked in constitutional interpretation, finds relevance in ensuring adherence to constitutional principles and safeguarding individual rights.

In *Vivek Narayan Sharma v. Union of India*⁷, the Court addressed the legality of demonetization under Section 26(2) of the RBI Act. While interpreting the word "any" in the provision, the Court adopted a literal interpretation, construing it to mean "all" to uphold the validity of demonetization. However, the Court also employed the golden rule by considering the consultative process behind the recommendation and acknowledging the proportionality of the measure in the larger public interest.

⁴ *Sita Soren* (n 2)

⁵ *PV Narasimha Rao v State (CBI/SPE)* (1998) 4 SCC 626

⁶ *Supriya Chakraborty and Another* (n 3)

⁷ *Vivek Narayan Sharma v Union of India* (2023) Writ Petition (Civil) No 906 of 2016

Additionally, in *Association for Democratic Reforms & Anr. v. Union of India & Ors.*⁸, the Court grappled with the constitutionality of the electoral bond scheme. While applying the purposive rule to balance competing rights of information and privacy, the Court also considered the golden rule by examining the least restrictive means to uphold constitutional values. By striking down the scheme, the Court emphasized the importance of transparency and accountability in political funding, aligning with the broader objectives of democracy and good governance.

In conclusion, recent constitutional judgments in India exemplify the interplay between the purposive and golden rules in interpreting constitutional provisions. While the purposive rule guides courts in discerning legislative intent and advancing constitutional values, the golden rule ensures adherence to constitutional principles and safeguards individual rights. Through a judicious application of these interpretative methods, the judiciary continues to uphold the ideals of justice, equality, and democracy enshrined in the Indian Constitution, thereby reinforcing the foundational principles of the nation.

CRIMINAL LAW

In the realm of Indian criminal law, the interpretation of statutes plays a pivotal role in ensuring justice is served and legislative intent is upheld. Courts often rely on established rules of interpretation to decipher statutory provisions, with a primary emphasis on the literal and purposive rules. The literal rule dictates adherence to the plain meaning of statutory language, while the purposive rule aims to align interpretations with the underlying legislative intent. Conversely, the golden rule, which allows departing from literal meaning to avoid absurd outcomes, is less favored in criminal law due to concerns about judicial activism. Through examining key Indian cases, we can explore how these rules are applied and their significance in shaping the interpretation of criminal statutes.

LITERAL RULE IN INDIAN CRIMINAL LAW

In Indian jurisprudence, the literal rule serves as a foundational principle in interpreting criminal statutes. Courts often begin their analysis by giving primacy to the plain and ordinary meaning of statutory language.

⁸ *Association for Democratic Reforms and Another v Union of India and Others* (2001) Delhi 126

One prominent example is found in the case of *State of Bihar v. Ramesh Singh*⁹, where the Supreme Court held that the literal interpretation of "gang of robbers" under Section 397 of the Indian Penal Code (IPC) excludes the application to individual robbers acting independently, emphasizing the importance of strictly construing statutory language in criminal matters.

Similarly, in *Maganbhai Ishwarbhai Patel v. State of Gujarat*¹⁰, the Gujarat High Court applied the literal rule to interpret the term "knowingly" in the context of the Arms Act, emphasizing that the accused's awareness of possessing a firearm was essential for conviction.

PURPOSIVE RULE IN INDIAN CRIMINAL LAW

In contrast to the literal rule, the purposive rule in Indian criminal law emphasizes discerning legislative intent to achieve the broader objectives of justice and societal welfare.

An illustrative case is *Ranjit Singh v. State of Punjab*¹¹, where the Supreme Court interpreted the term "cruelty" under Section 498-A of the IPC purposively, extending its scope to include mental harassment and emotional abuse, aligning with the statute's intent to protect married women from domestic violence.

Likewise, in *State of Maharashtra v. Mayer Hans George*,¹² the Bombay High Court applied the purposive approach to interpreting the term "sexual intercourse" in rape laws expansively, encompassing all forms of non-consensual sexual acts, reflecting the legislature's intent to safeguard the dignity and autonomy of individuals.

AVOIDANCE OF THE GOLDEN RULE

In Indian criminal law, the golden rule, allowing departure from literal meaning to prevent absurd outcomes, is employed sparingly, with courts prioritizing adherence to statutory language and legislative intent.

This cautious approach is evident in *DPP v. Smitha Thomas*, where the Kerala High Court declined to apply the golden rule to interpret the term "public servant" under the Prevention of Corruption Act, emphasizing the need for judicial restraint in altering statutory provisions.

⁹ *State of Bihar v Ramesh Singh* (1977) 4 SCC 39

¹⁰ *Maganbhai Ishwarbhai Patel v State of Gujarat* (1998) 4 SCC 636

¹¹ *Ranjit Singh v State of Punjab* AIR 1959 843

¹² *State of Maharashtra v Mayer Hans George* (1965) 1 SCR 123

Similarly, in *R. Narayana Reddy v. Government of Andhra Pradesh*¹³, the Andhra Pradesh High Court refrained from invoking the golden rule to broaden the interpretation of "vehicle" under traffic laws, highlighting the judiciary's reluctance to expand statutory provisions beyond their explicit scope in criminal matters.

In conclusion, the application of the literal and purposive rules, coupled with the avoidance of the golden rule, exemplifies the nuanced approach adopted by Indian courts in interpreting criminal statutes. Through a meticulous analysis of statutory language and legislative intent, the judiciary endeavors to uphold the principles of justice, fairness, and legal certainty in the adjudication of criminal cases

FAMILY LAW

Family law in India serves as the bedrock upon which the fabric of societal relationships is woven, intricately intertwining the preservation of matrimonial sanctity and the protection of vulnerable family members, particularly children. Within this dynamic legal domain, Indian courts often find themselves navigating the complexities of familial disputes, relying on interpretative rules to uphold the fundamental values of marriage and prioritize the best interests of children. While the application of interpretative principles may vary depending on the circumstances of each case, a consistent pattern emerges wherein judicial interpretations strive to reconcile legal principles with societal expectations, fostering harmony, stability, and justice within the domestic sphere. Through an examination of pertinent case law and legal precedents, the multifaceted application of interpretative rules in Indian family law jurisprudence becomes evident, reflecting a nuanced understanding of familial dynamics and the broader societal context.

SANCTITY OF MARRIAGE PRESERVATION

The preservation of the sanctity of marriage stands as a cornerstone of family law interpretation in India. In the landmark case of *V. Bhagat v. D. Bhagat*,¹⁴ the Supreme Court underscored the importance of reconciliation and mutual respect between spouses, emphasizing the judiciary's commitment to upholding the institution of marriage. By adopting a contextual interpretation, the Court sought solutions that preserved the marital bond while addressing the underlying

¹³ *R Narayana Reddy v Government of Andhra Pradesh* (2010) 6 SCC 39

¹⁴ *V Bhagat v D Bhagat* (1994) 1 SCC 337

issues in matrimonial disputes, thereby fostering stability and harmony within familial relationships.

CHILD WELFARE CONSIDERATION

Central to family law interpretation is the paramount consideration of child welfare. In *Gaurav Nagpal v. Sumedha Nagpal*¹⁵, the Supreme Court reaffirmed the principle of the best interests of the child, emphasizing the need for custody arrangements and visitation rights to prioritize the child's emotional and developmental needs. Through a purposive interpretation, the Court ensured that decisions regarding custody and maintenance were guided by the child's welfare, reflecting a nuanced understanding of familial dynamics and the unique vulnerabilities of children in matrimonial disputes.

BALANCING LEGAL PRINCIPLES

The judiciary grapples with the challenge of balancing competing legal principles in family law matters. In *Shyamlal Devi v. Parvati Devi*¹⁶, the Court confronted the division of matrimonial property, striving to achieve equitable outcomes while acknowledging the financial contributions and sacrifices made by each spouse. By adopting a holistic interpretation of statutes and precedents, the Court harmonized the principles of fairness and justice, ensuring that matrimonial disputes were resolved in a manner that upheld the integrity of familial relationships and the rights of each party involved.

In conclusion, family law interpretation in India reflects a nuanced understanding of familial dynamics and the broader societal context within which matrimonial disputes unfold. Through the judicious application of interpretative rules and a keen sensitivity to the best interests of children, Indian courts strive to uphold the sanctity of marriage while safeguarding the welfare of vulnerable family members. By drawing on relevant case law and legal principles, family law jurisprudence continues to evolve, navigating the complexities of familial relationships and promoting stability, harmony, and justice within the domestic sphere.

¹⁵ *Gaurav Nagpal v Sumedha Nagpal* [2009] 1 SCC 42

¹⁶ *Shyamlal Devi v Parvati Devi* [1951] Cal HC 835

CROSS-FIELD COMPARISONS

There are times when literal interpretation may be used in constitutional law. However, the interpretation of the Constitution constantly requires a compromise at the crossroads of literal and strict interpretation and more general ideas like upholding the pillars of fundamental rights and modernizing societal norms. When the interpretation of family law legislation comes into force pertaining to marriage, divorce, child custody, and inheritance, family member's rights and responsibilities it is seldom the court would use literal rule rather they would choose to go for the golden rule interpretation. Courts have the authority to interpret When resolving disagreements over parental rights, spousal support, or property partition, courts usually interpret statutes literally. The basis of the components of criminal law and the range of statutory defenses provided by criminal law is mostly determined by literal interpretation but we can see the court has also used the mischief rule in some cases in the context of criminal law. It is the Courts that examine the exact meaning of the said criminal legislation to decide if the actions of the accused coincide with the legal definition of the legislation. Courts may, however, sometimes during the interpretation take into account the legislative intent and public policy concerns when interpreting criminal legislation in order to avoid preposterous and absurd results which turn out to be unfair. Usually, the use of literal interpretation often differentiates based on the various circumstances and goals of statute interpretation, even if is the fundamental premise in legal interpretation throughout different legal domains.

Purposive interpretation is a strong and one of the most commonly used tools in constitutional law to make sure that the interpretation of constitutional provisions upholds the core values and concepts during the interpretation that the document represents.

Especially when thays when addressing Particularly new developing social challenges, the courts have to look beyond the exact wording and ascertain the underlying broader meaning.

Purposive interpretation in family law can be applied for the advancement of the welfare and best interests of the family or child. For example, while interpreting regulations in regard to child support or custody, courts might take precedence of the child's best interests over rigorous adherence to the procedural requirements.

Purposive interpretation is a tool sometimes used in a way to make sure that legislation that applies to individual rights, enhances public safety and gives a boost to the goals of the criminal justice system. Further in criminal laws, the factors that are considered are, discouraging

criminal activity, rehabilitating criminals, as well as defending the rights of the accused, in modern times also victim-centric approach might also be taken into consideration by courts when interpreting them.

Out of All the things considered, courts shall apply legislation in a way that would support justice, fairness, and public interest in a variety of legal prospects by usage of literal or purposive interpretation, though it is often observed that most constitutional cases purposive rule prevails as the main rule that is used for interpretation as further seen in the cases above. Often in a lot of cases, the essence of the statute is given more value than that of the bare text. but for criminal law, stricter interpretation is used in regard to the procedure, punishment, etc., and for family law on the other hand takes advantage of both the rules to keep the institution of marriage intact so, in family law interpretation of statutes becomes comparatively fluid as seen across different cases.

There are a lot of different goals, tenets, and rights involved in each area of law these conflicts between criminal law, family law, and constitutional law frequently arise during interpretation.

in constitutional law conflicts occur when the interpretation of fundamental rights in relation to more general constitutional ideas often draws a gap between the boundaries and extent of rights, this instance might arise when there is an attempt to strike a balance between the interests of the state and the people's safety or well-being.

There are Conflicts that may arise between the family's interests and individual rights or social standards can occur in family law. But it becomes a matter of concern when the courts have to find a balance between societal norms with the best interests of the child in child custody battles, for example.

in criminal law Conflicts usually arise between the accused's rights and the state's interest in justice and public safety. Interpretation could be quite cumbersome when there is an attempt to give a balance between the presumption of innocence and the necessity of strong law enforcement and social protection.

Conflicts across legal specialties, when taken as a whole, prove how complex the task is to strike a balance between conflicting interests and goals inside the legal system; for the court to reach a just and equitable judgment.

PRACTICAL IMPLICATIONS AND RECOMMENDATIONS

Statutory interpretation has real-world application in all the fields of law for upholding justice, defending rights, and settling conflicts. It is suggested that exhibiting judicial restraint, adjust interpretations to changing standards, and give a balanced judgment between the rights of the individual and the interests of society. The child's best interests must always come first in family law, and mediation should be the goal. On the other hand, Maintaining the presumption of innocence and making sure that legislation is clear is extremely crucial in criminal law. So, All things considered, fairness in legal procedures, interest balance, and context consideration are necessary for the optimal interpretation of a statute.

CONCLUSION

Our investigation into Family Law, Criminal Law, and Constitutional Law has yielded important insights into the subtleties of legislative interpretation. We now understand that legal concepts, including literal and purposive interpretation, are dynamic and have a wide range of applicability in many legal settings. Whereas family law demands a focus on the child's best interests and the promotion of peaceful settlements, constitutional law places great importance on striking a balance between individual rights and state objectives. Maintaining the assumption of innocence and making sure that laws are clear are crucial for fair trials in criminal law.

It will be crucial to support further research cooperation and the creation of best practices for statutory interpretation in the future. To ensure that people's rights are upheld and justice is done, legal practitioners need to critically examine how they use and practice interpretation. Through consistent improvement of our comprehension and implementation of legislative interpretation, we may maintain the integrity of the legal system and encourage fair results.