



THEORY OF GOLDEN TRIANGLE UNDER THE INDIAN CONSTITUTION

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INTRODUCTION

The evolution of statutory presumption in Indian law is closely tied to the establishment of the legal system during the colonial period and its gradual development within the constitutional framework after independence. Statutory presumptions are particular provisions in the law that enable courts to presume a fact to be true unless contradicted by the opposite party. These presumptions help lighten the burden of proof, especially in complex cases involving social justice, public interest, or criminal activity. The Indian Evidence Act, 1872, introduced a large number of such presumptions, which remain an indispensable part of the judicial process. Examples include Section 113A (presumption as to abetment of suicide by a married woman) and Section 113B (presumption as to dowry death), which authorise courts to infer on prima facie facts, rebuttable. But the application and extension of statutory presumptions must at all times be in line with the underlying principles of the Indian Constitution, particularly the doctrine of the Golden Triangle — harmonious interpretation of Articles 14, 19, and 21. This theory, formalised in the seminal judgment of *Maneka Gandhi v. Union of India* (1978)¹, requires that every law impacting personal liberty be just, reasonable, and fair, ensuring that provisions of legislation do not infringe on fundamental rights in the form of a disguise of procedural law. Statutory presumptions, especially in criminal legislation such as the Narcotic Drugs and Psychotropic Substances Act (NDPS Act) or the Prevention of Corruption Act, tend to create constitutional issues because they reverse the burden of proof on the accused, going against the presumption of innocence — one of the pillars of natural justice. Courts have intervened to avoid such presumptions leading to arbitrary deprivation of liberty, thereby safeguarding Article 21. For instance, in *Noor Aga v. State of Punjab* (2008), the Supreme Court reasserted that statutory presumptions must be narrowly interpreted and should not

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¹ *Maneka Gandhi v. Union of India* 1978 SCR (2) 621

override the fundamental rights enshrined under Articles 14 and 21. Likewise, in *Kali Ram v. State of Himachal Pradesh* (1973), the Court noted that the presumption of innocence is a human right, and statutes should not water down this unless supported by compelling state interest and reasonable protection. The evolution of statutory presumption in India, therefore, is a subtle balance between constitutional morality and legislative power. The judiciary, as the guardian of basic rights, has always insisted that every invasion of the privacy of the individual by presumptive provisions will be subjected to the test of proportionality and justice. The Golden Triangle hypothesis functions as a constitutional checkpoint to guide statutory presumptions, while beneficial to advance justice and correct grievous wrongs in society, not to turn into instruments of oppression or injustice. As Indian judicial jurisprudence keeps unfolding, it is important that legislatures and courts continue to protect the spirit of the Constitution, and procedural tools such as presumptions do not erode the right to equality, freedom, and life with dignity.

MEANING OF GOLDEN TRIANGLE IN THE INDIAN CONSTITUTION

The Golden Triangle of the Indian Constitution is a term used to explain the distinct, interrelated, and interdependent character of three basic rights regarded as the foundation of India's democratic framework—Articles 14, 19, and 21. These three articles, laid down in Part III of the Indian Constitution, form the most important columns for the purpose of providing justice, liberty, and equality to every citizen of the country. Together, they safeguard the freedom and rights of the citizens and provide a climate of law that articulates the essence of the Constitution. Article 14 enshrines the Right to Equality, promoting the fact that all persons are equal before the law and should be afforded equal protection by it. The article bars discrimination and arbitrary treatment by the State, which serves as the backbone of justice and equity in every legal and governmental process. Article 19 gives the Right to Freedom, which encompasses several basic freedoms like freedom of speech and expression, freedom to peacefully assemble, freedom to associate or unionise, freedom to move freely anywhere in the country, freedom to settle and live in any region of India, and freedom to practice any profession or engage in any trade or business. These freedoms are at the core of how a democratic society functions because they give people the ability to express themselves, partake in the governance of their country, and strive for personal and professional growth. Article 21 promises the Right to Life and Personal Liberty, in that no individual can be deprived of their life or personal liberty except by a procedure set by law. The judiciary's interpretation

of Article 21 has, in the course of time, extensively amplified its reach to encompass a broad range of rights including the right to privacy, the right to a healthy environment, the right to free legal services, the right to education, and so on a status that makes it one of the most vibrant and extensive provisions in the Constitution.

What makes these three articles so significant is not just their individual content but their mutual dependence and their collective strength. They are not standalone provisions; instead, they are interlinked and must be interpreted together to give them their full meaning. It is this interconnectedness that brings about the notion of the "Golden Triangle." For example, equality under Article 14 is a precondition for the effective exercise of the freedoms provided for under Article 19. Unless people are treated equally before the law, their freedom of speech, assembly, or movement might be unfairly curtailed and result in unfair consequences. Equally, protection of individual liberty under Article 21 would ring hollow without being coupled with the guarantees of Article 14 and Article 19. A law taking away someone's liberty, for instance, would have to be fair, equitable, and reasonable a yardstick that has been maintained by reading these three articles together. This approach was notably reaffirmed in the classical case of *Maneka Gandhi v. Union of India* in 1978, where the Supreme Court stated that any process having an impact upon life or liberty not only must be legal but must also be fair, just, and reasonable. This was a landmark case for Indian constitutional law since it took Articles 14, 19, and 21 and interwove them into a unified doctrine, which rewrote the context of personal liberty in India. The Court held that these articles were not to be read in isolation and had to be read together in order to enjoy the complete extent of rights they provide.

The Golden Triangle thus forms the constitutional foundation for the protection of civil liberties in India. It ensures that all citizens are not only equal before the law but also free to speak, associate, and live with dignity. These rights are necessary for the proper functioning of a democratic society. Equality without freedom is selective and oppressive. Freedom without equality makes life worthless and meaningless. And liberty, without which freedom and equality are unattainable. Together, the three rights protect individuals from arbitrary action by the state, uphold the rule of law, and maintain a balance between individual liberties and public interests. Additionally, the Golden Triangle embodies the essential values enshrined in the Preamble to the Constitution—justice, liberty, and equality. These values are not just philosophical ideals but are enforceable rights under the guarantee of the provisions in articles 14, 19 and 21. The judiciary has, in recent years, had a major role in interpreting and broadening

the horizons of these articles in order to meet new challenges and safeguard the rights of citizens in a rapidly changing society. For example, the privacy right was deemed to be a fundamental right under Article 21 in the 2017 landmark case of *K.S. Puttaswamy v. Union of India*. The court thought that the right to privacy is inextricably woven into life and liberty and, therefore, is a part of the Golden Triangle. Similarly, the right to the use of the internet, the right to habitation, and the right to a clean and healthy environment have all been construed into the broader concept of the right to life under Article 21, as per the standards of freedom and equality.

These developments show that the Golden Triangle is not a static concept but a dynamic doctrine that evolves with time. It adapts to the changing needs of society and still protects individual rights against growing state power, technological changes, and global challenges. Another essential element of the Golden Triangle is that it acts as a check on the legislative and executive branches of government. Any law or administrative order contrary to the rights guaranteed under these articles is subject to judicial review. The judiciary has always held as invalid laws and policies that are against the principles of equality, freedom, and personal liberty. This ensures the government is accountable and its actions are always subject to the boundaries of constitutional morality. The Golden Triangle doctrine has also influenced public interest litigation (PIL) in India, which has enabled citizens and civil society organisations to approach the courts to protect collective rights. PILs based on the Golden Triangle have led to reforms in environmental protection, police reform, prison reform, and protection of marginalised groups.

ARTICLE 14 OF THE INDIAN CONSTITUTION – RIGHT TO EQUALITY

Article 14 of the Indian Constitution is the most basic but strongest provision guaranteeing the notion of equality within the Indian democratic system. Article 14 stands as the earliest article in the Golden Triangle, followed by Articles 19 and 21, and has been a chief pillar of Indian constitutional rights. Article 14 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." This provides that all persons, irrespective of their caste, religion, gender, class, or place of birth, are entitled to equal treatment under the law. The theory of "equality before law" is adopted from British law and means the denial of any particular privilege to anybody, whereas "equal protection of the laws" is adopted from the American Constitution and provides the guarantee that in similar circumstances, the same treatment would be given to the people. Together, they provide both

formal and substantive equality, and that too with the establishment of a legal environment against arbitrary and discriminatory conduct by the State.

Article 14 does not imply that everyone should be treated equally in all cases, but it makes provision for reasonable classification. This implies the law can discriminate between individuals or groups if the classification is on the basis of an intelligible differentia and there is a rational link to the objective sought to be attained. For instance, education and employment reservation policies for Scheduled Castes, Scheduled Tribes, and Other Backward Classes are constitutionally valid since they aim to bring about social equality and justice. The judiciary has been instrumental in interpreting Article 14, and through seminal judgments, it has broadened its scope to address new types of inequality. In the case of *E.P. Royappa v. State of Tamil Nadu*, the Supreme Court held that equality is not a formalism but a living concept which seeks to eliminate arbitrariness in state action. In the same vein, in *Maneka Gandhi v. Union of India*, the Court reiterated that Article 14, read together with Articles 19 and 21, constitutes an integral code which guarantees fairness, reasonableness, and justice to all legislation and processes touching the lives of people.

Article 14 is important not just because it safeguards citizens from discrimination, but also because it guarantees that the rule of law prevails in every sphere of administration. It acts as a brake on the capricious exercise of power and guarantees that the laws are uniformly and impartially applied. In the absence of equality before the law, the remaining rights in the Golden Triangle would have no meaning. Liberty and individual freedom cannot exist in a state where citizens are not treated on an equal basis. Article 14, therefore, is not merely a constitutional provision; it is a moral and democratic code that embodies the fundamental values of justice, fairness, and dignity for all. It reinforces the constitutional vision of a just, inclusive, and egalitarian society and is necessary to secure the unity and integrity of the country.

ARTICLE 19 OF THE INDIAN CONSTITUTION – RIGHT TO FREEDOM

Article 19 of the Indian Constitution is an integral part of the Golden Triangle, along with Articles 14 and 21, and is the cornerstone of the democratic framework of the nation. It ensures for all citizens a group of six basic freedoms which are essential for the development of a human being and for the running of a free and democratic society. All these liberties encompass the liberty of speech and expression, the right to peacefully assemble without arms, the right to

associate or unionise, the right to travel and move freely throughout the Indian territory, the right to settle and live in any region of the nation, and the right to pursue any vocation, or to engage in any profession, trade or business. Together, these rights facilitate people to take an active role in political, social, and economic life, and Article 19 is thus one of the most empowering articles in the Constitution.

The freedom of speech and expression, in fact, is regarded as the lifeblood of democracy. It enables citizens to give their views, criticise the government, and exchange ideas freely without punishment, provided that their expression does not cause harm to public order, decency, or the sovereignty of the country. The right to assemble and associate facilitates collective action and protest, allowing individuals to come together for common purposes and participate in democracy. The right to move freely, settle anywhere in India, and work in any occupation within India promotes national integration, lowers regional barriers, and offers the people of India equal opportunities everywhere. Article 19 is not absolute; reasonable restrictions may be imposed on these rights by the State in the interest of India's sovereignty and integrity, security of the State, public order, morality, and interests of the general public. These limitations are intended to reconcile individual freedom with the greater interests of society.

The significance of Article 19 is further accentuated when viewed in association with Articles 14 and 21. For example, freedom of expression (Article 19) can't be completely effective without equality before the law (Article 14) and protection of personal liberty (Article 21). The interconnectedness of the guarantees of rights provides individual freedoms to be exercised in a balanced and fair environment free from discrimination or interference that is not in harmony. In the landmark *Maneka Gandhi v. Union of India* case in the past, the Supreme Court reaffirmed that the freedom under Article 19 must be interpreted in harmony with Articles 14 and 21, which tends to support the proposition that the three articles form a harmonious body of basic rights. Such a reading was a major milestone in the evolution of Indian constitutional law. Article 19 is instrumental for building a strong democracy. Article 19 enables people to express dissent, engage in social reform, and search for opportunities across the nation. In the absence of the freedoms offered under Article 19, the ideas of equality and freedom would remain incomplete. Accordingly, Article 19 doesn't just empower individuals but also plays a big role in maintaining the democratic and constitutional spirit of India.

ARTICLE 21 OF THE INDIAN CONSTITUTION – THE RIGHT TO LIFE AND PERSONAL LIBERTY

Article 21 of the Indian Constitution is among the most vital and vibrant provisions in the context of fundamental rights, and it completes the Golden Triangle, with Articles 14 and 19. It declares that "No person shall be deprived of his life or personal liberty except according to procedure established by law." Although the words of Article 21 appear simple, the meaning and scope provided to it by the Indian judiciary over the years have transformed it into the most expansive and inclusive right in the Constitution. Initially, it was understood narrowly, requiring only a legal procedure for depriving someone of life or liberty. Yet, in the classic case of *Maneka Gandhi v. Union of India* (1978), the Supreme Court held that this process had to be "just, fair, and reasonable," thus closely linking Article 21 with Article 14 (equality before law) and Article 19 (freedom of speech and movement), thereby introducing the theory of the Golden Triangle of rights.

The "right to life" under Article 21 extends well beyond animal survival. The Supreme Court has interpreted it as a life of dignity, which includes all that gives meaning to life, such as access to food, shelter, health care, a clean environment, education, privacy, and means of livelihood. Other rights have, from time to time, been encompassed within Article 21 by judicial activism. These are the right to a clean environment, the right to legal assistance, the right to speedy trial, the right to education, and the right to privacy, which was specifically established as a basic right in the *K.S. Puttaswamy v. Union of India* (2017) judgement. All of these rights aid in upholding the dignity and personal freedom of a person, and their protection is essential to a just and humane society.

Article 21 is also a powerful shield against arbitrary and unconstitutional actions of the State. It ensures that the freedom of an individual cannot be restricted on the grounds of the absence of procedure or insufficiency of reason.

This is necessary in a democracy where excessive State power tends to create tyrannies with great ease. Also, Article 21 is an interface between the civil and the socio-economic rights and thus constitutes the pivot point of Indian constitutional thought. Its strong relationship with Articles 14 and 19 guarantees that freedom is enjoyed equally and equitably. For instance, an individual's right to speak their mind (Article 19) or to travel freely within the nation (Article

19) is effective only if they are safeguarded against illegal detention or harassment (Article 21), and if all people are dealt with equally and fairly in this regard (Article 14).

Essentially, Article 21 infuses life and meaning into the rest of the rights in the Constitution. It provides that people not only exist but can live in dignity, security, and freedom. As one of the elements of the Golden Triangle, Article 21 helps to balance individual rights against State authority. It is the Constitution's pledge to human dignity, the rule of law, and justice, and is crucial for upholding the democratic spirit of India.

LANDMARK JUDGEMENTS

Keshavananda Bharati v. State of Kerala (1973):² The Kesavananda Bharati judgment, which was given on 24 April 1973, is a milestone judgment of the Supreme Court of India. The case was brought by Sri Kesavananda Bharati, the spiritual head of a Hindu mutt in Kerala, against the constitutional validity of the 24th, 25th and 29th Amendments to the Indian Constitution, which aimed to limit the jurisdiction of the judiciary and citizens' fundamental rights.

This case was presided over by a bench of 13 judges of the Supreme Court of India, and it is one of the largest benches in the history of India. The bench consisted of Chief Justice S. M. Sikri, Justice J.M.Shelat, Justice K.S. Hegde, Justice A.N.Grover, Justices A.N. Ray, Justice P. Jaganmohan Reddy, Justice D.G. Palekar, Justice H.R. Khanna, Justice K.K. Mathew, Justice M.H. Beg, Justice S.N. Dwivedi, Justice A.K. Mukherjee and Justice Y.V. Chandrachud.

The court was established to preside over the case since it was a matter of constitutional significance involving the powers of Parliament to alter the Constitution. The court took six months to listen to the case and pass the final verdict. The Supreme Court, in a landmark 7:6 majority verdict, advanced the basic structure doctrine of the Constitution, stating that certain elemental characteristics of the Constitution, e.g., democracy, secularism, federalism, and rule of law, cannot be abolished by parliament. The court further asserted that judicial review power constitutes part of the basic structure of the Constitution, and cannot be revoked by Parliament through constitutional modification.

² Keshavananda Bharati v. State of Kerala, (1973) 4 SCC 225

The importance of the Kesavananda Bharati case is that it laid down the doctrine of basic structure of the Indian Constitution. The basic structure doctrine believes that some essential aspects of the Constitution, like the superiority of the Constitution, the rule of law, and the independence of the judiciary, cannot be changed or revoked by Parliament by way of a constitutional amendment. This doctrine has acted as a check on Parliament's power to alter the Constitution and has seen to it that the Constitution continues to be a living document that is sensitive to the times and yet retains its core values and principles. The Kesavananda Bharati case has therefore had long-term implications for India's constitutional evolution, making it one of the most important cases in Indian constitutional law.

The Kesavananda Bharati case involved a number of significant legal issues, such as the constitutional validity of the Kerala Land Reforms Act and the limits of the Parliament's ability to amend the Constitution.

Constitutional Validity of the Kerala Land Reforms Act: The central legal question in the case was the constitutional validity of the Kerala Land Reforms Act, which put a cap on the amount of land one could own and authorised the acquisition of surplus land from landholders. Kesavananda Bharati contended that the Act encroached upon his fundamental right to property, which was assured by the Constitution of India.

The scope of the Parliament's power to amend the Constitution: The other important legal issue in the case was the scope of the Parliament's power to amend the Constitution. The issue before the Supreme Court was whether the power of Parliament to amend the Constitution was unrestricted or if there were any limits to such power.

The basic structure doctrine of the Constitution: In its judgment, the Supreme Court formulated the basic structure doctrine of the Constitution, which is to the effect that certain essential elements of the Constitution, including the supremacy of the Constitution, rule of law, and independence of the judiciary, cannot be removed or altered by the Parliament in the form of a constitutional amendment. The issue before the court was whether this doctrine was constitutional and whether the amending power of Parliament included this doctrine.

The major legal issues at stake in the Kesavananda Bharati case included the constitutional validity of the Kerala Land Reforms Act, the nature of the Parliament's amending power, and the formulation of the doctrine of basic structure of the Constitution.

Arguments of the petitioner: Kesavananda Bharati, a religious leader and landowner, had contended that the Kerala Land Reforms Act infringed upon his fundamental right to property under the Constitution of India. He further contended that the amending power of the Parliament was not absolute and that some basic features of the Constitution, like the property right, fell outside the domain of amendment.

Arguments of Respondent: The State of Kerala, which argued in favour of the constitutionality of the Kerala Land Reforms Act, stated that the Act was a rational restriction on the property right and that the Act was directed towards ensuring social justice and combating poverty. The State further claimed that the Parliament's ability to amend the Constitution was not bound by any limitation and that the power had no limits.

Intervenors' arguments: There were a number of intervenors in the case who represented one or the other party. According to some intervenors, the Kerala Land Reforms Act was a measure needed to enhance social justice and end poverty, but others opined that the Act infringed on the fundamental property right. Certain intervenors also contended that Parliament's amending power was not absolute and that some essential provisions of the Constitution, including the independence of the judiciary, were not subject to amendment.

The Kesavananda Bharati case is credited as a milestone in Indian constitutional law history because it declared the precedence of the Constitution and the autonomy of the judiciary to preserve the basic framework of the Constitution. The ruling established several principles that have set the foundation for constitutional law in India. These are the rule of law principles, separation of powers, and judicial independence. It has also played a role in the development of the Indian judiciary's constitutional interpretation and the boundaries of Parliament's authority to amend the Constitution.

The Supreme Court, in a 7-6 majority ruling, held that the Constitution of India possesses a basic structure, which cannot be changed even through a constitutional amendment. The court ruled that Parliament's amending power under Article 368 was not absolute and that it could not change the basic structure of the Constitution. This has acted as a significant limitation on the amending power of the Parliament to the Constitution.

Maneka Gandhi v Union of India:³ Petitioner is the owner of the passport granted to her on 1st June, 1976 under the Passport Act, 1967. On 4th July, 1977 the Petitioner was sent a letter dated 2nd July, 1977 by the Regional Passport Officer, Delhi informing to her that it has been resolved by the Government of India to requisition her passport under section 10(3)(c) of the Act in public interest and to require surrender of the passport within seven days of the date of receipt of the letter. The petitioner promptly wrote to the Regional Passport Officer asking him to provide a copy of the statement of reasons for passing the order as under section 10(5) to which reply was made on 6th July, 1977 by the Government of India, Ministry of External Affairs saying inter alia that the Government has resolved "in the interest of the general public" not to provide her with a copy of the statement of reasons, for the passing of the order. The Petitioner subsequently preferred the current petition against the act of the Government in seizing her passport and refusing to provide reasons therefor. The Government's action was challenged inter alia on the basis that it was mala fide, but this challenge was not urged before us at the hearing of the arguments, and therefore it is not required to state any facts on that question. The major challenge laid before the court of law in the petition against the legality of the act of the Government was primarily grounded on the reason that section 10(3)

Issues:

1. Whether the act of impounding Maneka Gandhi's passport without giving her a chance to be heard violated her fundamental right under Article 21.
2. Whether the "procedure established by law" under Article 21 must be **fair, just, and reasonable**, and not arbitrary or oppressive.
3. Whether not providing Maneka Gandhi an opportunity to be heard before taking away her passport was a violation of the **audi alteram partem** rule (right to be heard).
4. Whether the term "personal liberty" under Article 21 is to be interpreted narrowly or broadly.
5. Whether Articles 14 (Right to Equality), 19 (Freedoms), and 21 (Right to Life and Liberty) are interrelated and must be read together, not in isolation.

In the Justice K.S. Puttaswamy (Retd.) v. Union of India case, the Supreme Court's reasoning was rooted in balancing the individual's fundamental right to privacy with the State's responsibility to ensure efficient delivery of welfare schemes. The Court acknowledged that

³ Maneka Gandhi v. Union of India 1978 SCR (2) 621

privacy is a fundamental right under Article 21, as recognised in the 2017 Puttaswamy (Privacy) judgment, and any encroachment upon this right must meet the tests of legality, necessity, and proportionality. It reasoned that the Aadhaar scheme served a legitimate state aim by helping eliminate identity fraud and ensuring subsidies reached the rightful beneficiaries, particularly the poor and marginalised. The Court found that the collection of biometric data under the Aadhaar system was done through a lawful process and with adequate safeguards, and therefore did not amount to a disproportionate violation of privacy. However, the Court also emphasised that Aadhaar should not become an instrument of surveillance or be used excessively beyond its core purpose. As a result, it struck down portions of the Aadhaar Act, such as Section 57, which allowed private entities to use Aadhaar data, citing concerns over privacy and data misuse. While upholding the Aadhaar Act as a Money Bill, the Court acknowledged the controversy but maintained that the Act primarily dealt with the distribution of subsidies from the Consolidated Fund of India. Overall, the Court's reasoning reflected an attempt to safeguard individual freedoms while endorsing a digital identity system that promotes transparency and inclusion in welfare governance.

The Maneka Gandhi v. Union of India case marked a turning point in Indian constitutional law by significantly broadening the interpretation of the right to life and personal liberty under Article 21. The Supreme Court held that any law depriving a person of their liberty must not only be backed by legislation but must also be just, fair, and reasonable. The judgment emphasised that the procedure established by law cannot be arbitrary, oppressive, or violative of principles of natural justice. It also established the vital connection between Articles 14, 19, and 21, asserting that these fundamental rights are not mutually exclusive but must be read together to offer complete protection to citizens. The Court concluded that impounding Maneka Gandhi's passport without providing her an opportunity to be heard violated the principles of natural justice and was therefore unconstitutional. This landmark decision laid the foundation for a more expansive and humane interpretation of fundamental rights, strengthening the framework for individual freedom and the rule of law in India.

Justice K.S. Puttaswamy (Retd.) vs Union of India on 26 September 2018:⁴ The case of Justice K.S. Puttaswamy (Retd.) v. Union of India, decided on 26 September 2018, revolved around the constitutional validity of the Aadhaar scheme. Aadhaar, a government initiative, assigns a unique 12-digit identification number to residents of India based on their biometric

⁴ Justice K.S. Puttaswamy (Retd) vs Union Of India on 26 September, 2018, 2019 (1) SCC

and demographic data. The petitioner, Justice K.S. Puttaswamy, a retired judge, filed a Public Interest Litigation (PIL) in 2012 challenging the Aadhaar scheme, arguing that it violated the fundamental right to privacy guaranteed under Article 21 of the Constitution. The concerns centred on the potential misuse of personal data, lack of consent, threat of mass surveillance, and the risk of profiling. The challenge also questioned the legitimacy of passing the Aadhaar Act, 2016, as a Money Bill, which bypassed the scrutiny of the Rajya Sabha. While the government defended Aadhaar as a tool for empowering the poor, reducing corruption, and ensuring efficient delivery of welfare services, the petitioners highlighted the absence of strong data protection mechanisms and consent-based usage. The case was heard by a five-judge Constitution Bench, following the landmark 2017 judgment by a nine-judge Bench which had unanimously declared the right to privacy as a fundamental right. The Aadhaar case thus stood at the intersection of technology, governance, and civil liberties, raising critical questions about the balance between state interests and individual rights.

The main concerns in the case of Justice K.S. Puttaswamy (Retd.) v. Union of India revolved around the constitutional validity of the Aadhaar scheme and its implications on basic rights. One of the central issues was whether the Aadhaar scheme, under which biometric and personal data were collected, infringed upon the right to privacy enshrined in Article 21 of the Constitution, particularly after the Supreme Court judgment in 2017 that declared privacy to be a fundamental right. The other significant question was whether the Aadhaar Act, 2016, could be validly enacted as a Money Bill under Article 110, thus exempt from consideration by the Rajya Sabha, which was viewed by the petitioners as an abuse of legislative process. The case also challenged whether compelling Aadhaar acceptance for the use of different welfare schemes, subsidies, and basic services violated the right to equality under Article 14 and freedom of choice and dignity under Article 21. The other issues raised were concerns regarding data protection, scope for surveillance, and the absence of proper safeguards against misuse or unauthorised handling of citizens' personal information. These problems cumulatively posed larger questions regarding the balance between digital governance and individual constitutional liberties in a democratic society.

In its verdict, the Supreme Court gave a majority ruling affirming the constitutional legitimacy of the Aadhaar scheme but with major restrictions. The Court recognised that privacy is a basic right under Article 21, as decided in the 2017 privacy judgment, and consequently any incursion has to meet the tests of legality, necessity, and proportionality. It held that the

Aadhaar Act, in its true essence, was advancing a legitimate state interest by ensuring welfare delivery and preventing subsidies from being diverted to non-entitled parties, especially the marginalised sections. The Court held that gathering biometric data was not violative of privacy as proper safeguards had been put in place and the data had been stored safely. But the Court also held that Aadhaar could not be made compulsory for things such as opening bank accounts, obtaining mobile SIM cards, or entry into schools because that would interfere with individual autonomy and dignity. Significantly, the Court validated the passage of the Aadhaar Act as a Money Bill by a slender majority despite strong dissent condemning this action as unconstitutional. The Court invalidated some of the provisions, including Section 57, by which private parties were permitted to require Aadhaar authentication as unconstitutional. Generally, the Court tried to balance state interest in welfare distribution and safeguarding individual liberties by upholding Aadhaar for essential welfare ends but restricting its application for non-essential and commercial uses.

The final decision of the Justice K.S. Puttaswamy (Retd.) v. Union of India case shows the effort of the Supreme Court to harmonise the ends of social welfare and the upholding of personal constitutional rights. The Court recognised the constitutional legitimacy of the Aadhaar scheme, holding it as a means of guaranteeing subsidised and targeted dispensation of benefits and subsidies to the poor and thereby promoting a legitimate state purpose. But it also imposed stringent restrictions on its use to avoid infringement of privacy and abuse of personal information. The Court held that Aadhaar cannot be made compulsory for services like bank accounts, mobile numbers, or school admissions, and struck down provisions enabling private companies to insist on Aadhaar details. Although the majority favoured the introduction of the Aadhaar Act as a Money Bill, this section was criticised vigorously in the dissenting judgment. Basically, the judgment reiterated that the right to privacy is a fundamental right and that state actions always have to be proportionate, reasonable, and in accordance with due process. The decision thus established significant precedents in the fields of digital identity, data protection, and constitutional governance in India.

CONCLUSION

The principle of the Golden Triangle in the Indian Constitution created by Article 14 (Right to Equality), Article 19 (Right to Freedom), and Article 21 (Right to Life and Personal Liberty) is an original doctrine that guarantees protection and advancement of the rights of individuals in a democratic society. Articles 14, 19, and 21 are not discrete silos but are interrelated,

creating an indivisible triad that enshrines the principles of liberty, equality, and justice. The development of this principle, in particular through judicial interpretation, has had a revolutionary role to play in the making of India's constitutional democracy and has served as a bulwark against arbitrary and oppressive government actions.

The Supreme Court of India, in the seminal case of *Maneka Gandhi v. Union of India* (1978), emphatically enshrined the notion of reading these three basic rights together. Before this, Article 21 had been construed strictly, with the words "procedure prescribed by law" enabling the State to deprive life or liberty as long as it adhered to any law, irrespective of whether it was equitable. But then came the *Maneka Gandhi* judgment that transformed this perception by holding that any procedure under Article 21 has to be "just, fair, and reasonable" and cannot be arbitrary or oppressive. It also stressed that any legislation involving personal freedom had to meet the requirements of equality under Article 14 and freedom under Article 19, and thereby strongly entwining the three basic freedoms.

This meaning of the Golden Triangle gives us a strong infrastructure to challenge and assess laws and government actions. For instance, a freedom of speech-restricting law (Article 19) has to not only meet reasonable restrictions but also equally treat people (Article 14) and not trample upon their personal liberty (Article 21) by arbitrary or unfair procedures. The interdependence of these articles guarantees that individual freedoms are safeguarded not just in form but also in substance, supporting the values of the rule of law and constitutional morality.

This doctrine has been availed of over the years in many cases, such as the case of Justice K.S. Puttaswamy (Retd.) v. Union of India, which held that a right to privacy is a constitutional right under Article 21, read with Articles 14 and 19. This ruling has further widened the ambit of the Golden Triangle and reiterated the theory that fundamental rights are dynamic in nature and must change with changing times and circumstances.

Finally, the Golden Triangle of the Indian Constitution is the protector of personal freedom, equality, and liberty, making sure that the State cannot behave in an arbitrary or unfair way. It is the soul of the Constitution and makes sure that democratic values and individual dignity are maintained in all situations. By reading these three rights as interconnected and reinforcing one another, the judiciary has established a robust foundation for constitutional rule and human

rights protection in India. The Golden Triangle is more than a legal principle—it is a living principle that still guards citizens and enforces the vision of the Constitution in modern India.

REFERENCES

1. MP Jain, Indian Constitutional Law (8th edn, LexisNexis 2018) 908.
2. Constitution of India (1950).
3. Sanjay K K, 'Golden Triangle of the Constitution of India: Articles 14, 19 and 21' Legal Service India <https://www.legalserviceindia.com/legal/article-10701-golden-triangle-of-the-constitution-of-india-articles-14-19-and-21.html> accessed 18 April 2025.
4. 'The Golden Triangle of the Indian Constitution' (iPleaders Blog, 2016) <https://blog.iplayers.in/golden-triangle-indian-constitution/> accessed 18 April 2025.
5. Archisman Chakraborty, 'The Golden Triangle of the Indian Constitution' (Jus Corpus, 2022) <https://www.juscorpus.com/wp-content/uploads/2022/08/195.-Archisman-Chakraborty.pdf> accessed 17 April 2025.
6. Maneka Gandhi v Union of India [1978] 2 SCR 621 (India).
7. Justice KS Puttaswamy (Retd) v Union of India [2019] 1 SCC 1 (India).
8. Kesavananda Bharati v State of Kerala [1973] 4 SCC 225 (India).