



INTERNATIONAL LAW
JOURNAL

**WHITE BLACK
LEGAL LAW
JOURNAL
ISSN: 2581-
8503**

Peer - Reviewed & Refereed Journal

The Law Journal strives to provide a platform for discussion of International as well as National Developments in the Field of Law.

WWW.WHITEBLACKLEGAL.CO.IN

DISCLAIMER

No part of this publication may be reproduced or copied in any form by any means without prior written permission of Editor-in-chief of White Black Legal – The Law Journal. The Editorial Team of White Black Legal holds the copyright to all articles contributed to this publication. The views expressed in this publication are purely personal opinions of the authors and do not reflect the views of the Editorial Team of White Black Legal. Though all efforts are made to ensure the accuracy and correctness of the information published, White Black Legal shall not be responsible for any errors caused due to oversight or otherwise.

WHITE BLACK
LEGAL

EDITORIAL TEAM

Raju Narayana Swamy (IAS) Indian Administrative Service officer



Dr. Raju Narayana Swamy popularly known as Kerala's Anti-Corruption Crusader is the All India Topper of the 1991 batch of the IAS and is currently posted as Principal Secretary to the Government of Kerala. He has earned many accolades as he hit against the political-bureaucrat corruption nexus in India. Dr Swamy holds a B.Tech in Computer Science and Engineering from the IIT Madras and a Ph. D. in Cyber Law from Gujarat National Law University. He also has an LLM (Pro) (with specialization in IPR) as well as three PG Diplomas from the National Law University, Delhi- one in Urban Environmental Management and Law, another in Environmental Law and Policy and a third one in Tourism and Environmental Law. He also holds a post-graduate diploma in IPR from the National Law School, Bengaluru and

a professional diploma in Public Procurement from the World Bank.

Dr. R. K. Upadhyay

Dr. R. K. Upadhyay is Registrar, University of Kota (Raj.), Dr Upadhyay obtained LLB, LLM degrees from Banaras Hindu University & PHD from university of Kota. He has successfully completed UGC sponsored M.R.P for the work in the Ares of the various prisoners reforms in the state of the Rajasthan.



Senior Editor

Dr. Neha Mishra



Dr. Neha Mishra is Associate Professor & Associate Dean (Scholarships) in Jindal Global Law School, OP Jindal Global University. She was awarded both her PhD degree and Associate Professor & Associate Dean M.A.; LL.B. (University of Delhi); LL.M.; PH.D. (NLSIU, Bangalore) LLM from National Law School of India University, Bengaluru; she did her LL.B. from Faculty of Law, Delhi University as well as M.A. and B.A. from Hindu College and DCAC from DU respectively. Neha has been a Visiting Fellow, School of Social Work, Michigan State University, 2016 and invited speaker Panelist at Global Conference, Whitney R. Harris World Law Institute, Washington University in St. Louis, 2015.

Ms. Sumiti Ahuja

Ms. Sumiti Ahuja, Assistant Professor, Faculty of Law, University of Delhi,

Ms. Sumiti Ahuja completed her LL.M. from the Indian Law Institute with specialization in Criminal Law and Corporate Law, and has over nine years of teaching experience. She has done her LL.B. from the Faculty of Law, University of Delhi. She is currently pursuing PH.D. in the area of Forensics and Law. Prior to joining the teaching profession, she has worked as Research Assistant for projects funded by different agencies of Govt. of India. She has developed various audio-video teaching modules under UGC e-PG Pathshala programme in the area of Criminology, under the aegis of an MHRD Project. Her areas of interest are Criminal Law, Law of Evidence, Interpretation of Statutes, and Clinical Legal Education.



Dr. Navtika Singh Nautiyal

Dr. Navtika Singh Nautiyal presently working as an Assistant Professor in School of Law, Forensic Justice and Policy Studies at National Forensic Sciences University, Gandhinagar, Gujarat. She has 9 years of Teaching and Research Experience. She has completed her Philosophy of Doctorate in 'Inter-country adoption laws from Uttarakhand University, Dehradun' and LLM from Indian Law Institute, New Delhi.

Dr. Rinu Saraswat



Associate Professor at School of Law, Apex University, Jaipur, M.A, LL.M, PH.D,

Dr. Rinu have 5 yrs of teaching experience in renowned institutions like Jagannath University and Apex University. Participated in more than 20 national and international seminars and conferences and 5 workshops and training programmes.

Dr. Nitesh Saraswat

E.MBA, LL.M, PH.D, PGDSAPM

Currently working as Assistant Professor at Law Centre II, Faculty of Law, University of Delhi. Dr. Nitesh have 14 years of Teaching, Administrative and research experience in Renowned Institutions like Amity University, Tata Institute of Social Sciences, Jai Narain Vyas University Jodhpur, Jagannath University and Nirma University. More than 25 Publications in renowned National and International Journals and has authored a Text book on CR.P.C and Juvenile Delinquency law.



Subhrajit Chanda



BBA. LL.B. (Hons.) (Amity University, Rajasthan); LL. M. (UPES, Dehradun) (Nottingham Trent University, UK); PH.D. Candidate (G.D. Goenka University)

Subhrajit did his LL.M. in Sports Law, from Nottingham Trent University of United Kingdoms, with international scholarship provided by university; he has also completed another LL.M. in Energy Law from University of Petroleum and Energy Studies, India. He did his B.B.A.LL.B. (Hons.) focussing on International Trade Law.

ABOUT US

WHITE BLACK LEGAL is an open access, peer-reviewed and refereed journal provide dedicated to express views on topical legal issues, thereby generating a cross current of ideas on emerging matters. This platform shall also ignite the initiative and desire of young law students to contribute in the field of law. The erudite response of legal luminaries shall be solicited to enable readers to explore challenges that lie before law makers, lawyers and the society at large, in the event of the ever changing social, economic and technological scenario.

With this thought, we hereby present to you

AUTONOMY WITHOUT ACCOUNTABILITY? **RETHINKING THE CONSTITUTIONAL BALANCE IN** **STATE PUBLIC SERVICE COMMISSIONS**

AUTHORED BY - JEGANNATH C¹

ABSTRACT

This paper explains the constitutional vision, institutional evolution, and structural challenges of the State Public Service Commissions (PSCs) in India. Conceived as autonomous constitutional bodies under Articles 315 to 323 of the Constitution, the PSCs were designed to safeguard fairness and meritocracy in public recruitment. However, the author observes that, in recent years, several State PSCs have suffered from declining credibility due to procedural lapses, examination irregularities, paper leaks, and extensive litigation. Such failures, the author explains, not only erode administrative efficiency but also weaken the constitutional guarantee of equality of opportunity in public employment under Articles 14 and 16. The author suggests that meaningful reform must extend beyond technical corrections and focus on structural renewal. This paper proposes a comprehensive framework encompassing institutional, procedural, and technological reforms. The author argues for professionalising appointments, ensuring transparent recruitment calendars, securing digital examination systems, and creating robust grievance-redressal mechanisms. The author further explains that modernising syllabi, introducing ethical and constitutional studies, and encouraging inter-state coordination will align recruitment processes with contemporary governance realities. Ultimately, this paper concludes that restoring the credibility of State PSCs is essential for reinforcing constitutional ethos and democratic accountability. The author believes that reforming these institutions will reaffirm the State's commitment to fairness, transparency, and merit in governance. Strengthening PSCs is, therefore, not merely an administrative exercise; it is an affirmation of India's enduring constitutional promise that justice and opportunity must guide every arm of the State.

Keywords: *Accountability, Examinations, Meritocracy, Public Service Commission, Transparency, Recruitment.*

¹ Student of LL.M., Government Law College, Ramanathapuram, Tamil Nadu – 623504.

I. INTRODUCTION

Public Service Commissions (PSCs) represent one of the most enduring legacies of India's constitutional commitment to an impartial and merit-based civil service. As constitutional bodies under **Part XIV, Chapter II (Articles 315–323)**, they were envisaged as institutions designed to insulate public recruitment from political influence and administrative arbitrariness. The vision of an independent recruitment authority was not new to India's constitutional imagination—it can be traced to the **Montagu–Chelmsford Reforms of 1919**, which introduced the principle of “*Indianisation*” of the higher civil services, thereby sowing the seeds for an autonomous institution that would uphold merit and fairness in public employment². This demand culminated in the establishment of the Public Service Commission for India in **1926**, later constitutionally entrenched as the **Union Public Service Commission (UPSC)** and the **State Public Service Commissions (State PSCs)** after independence.

The framers of the Constitution viewed PSCs as an essential pillar of democratic governance, ensuring that recruitment to the civil services was based on competence rather than patronage or partisanship. The debates in the constituent Assembly clearly reflect a shared conviction that independence in recruitment would protect the “neutrality and integrity of administration.” Dr B.R. Ambedkar emphasised that impartial public service was indispensable to maintaining equality of opportunity in employment under **Article 16** and to upholding the principle of the rule of law within the executive machinery of the State³. However, over the years, the functioning of several State PSCs has deviated significantly from this constitutional vision. A series of controversies, ranging from paper leaks, examination postponements, reservation issues, delay in conducting examinations and opaque evaluation processes to large-scale litigations, have undermined public confidence in these institutions. The recent cases of recruitment irregularities in the Tamil Nadu Public Service Commission (TNPSC), Telangana State Public Service Commission (TSPSC) and procedural lapses in various other States highlight a deepening institutional malaise. These failures are not isolated; they reveal systemic weaknesses in the structure, governance, and operational ethos of State PSCs. Unlike the UPSC, which operates with relatively high standards of autonomy and transparency, most State PSCs struggle with inconsistent manpower planning, inadequate technological integration,

² Government of India, *Report on Indian Constitutional Reforms (Montagu–Chelmsford Report, 1919)*, Vol. I, p. 64 available at <https://archive.org/details/reportonindianco00grea> (last visited on 30.11.2025)

³ Constituent Assembly Debates, Vol. IX, 30 August 1949, Speech by Dr B.R. Ambedkar on the Draft Articles relating to Public Service Commissions, available at <https://www.constitutionofindia.net/constituent-assembly-debate/volume-9/> (last visited on 30.11.2025)

politicised appointments, and outdated examination frameworks. Such structural infirmities strike at the very heart of constitutional governance. When recruitment processes become mired in controversy, it erodes not only administrative efficiency but also citizens' trust in the fairness of the State. The resulting judicial interventions, often necessitated by the lack of procedural safeguards, further delay recruitment, compounding unemployment and institutional paralysis. Therefore, the problem is not merely administrative; it is fundamentally constitutional, for it threatens the guarantee of equality and fairness embedded in **Articles 14 and 16** of the Constitution.

This paper, therefore, seeks to examine the historical, legal, and institutional dimensions of State PSCs in India and to propose a comprehensive framework for reform. It explores the constitutional foundations of the PSC system, identifies structural and procedural challenges, and recommends pathways for reform that balance autonomy with accountability. The central question that guides this inquiry is: *How can India's State Public Service Commissions be institutionally and procedurally reformed to align with constitutional values and contemporary governance demands?*

II. CONSTITUTIONAL AND LEGAL FRAMEWORK OF PUBLIC SERVICE COMMISSIONS

The constitutional scheme for PSCs is embodied in Part XIV, Chapter II of the Constitution of India, encompassing **Articles 315 to 323**. These provisions lay the foundation for an independent and merit-based recruitment system, designed to secure fairness and impartiality in appointments to public offices. **Article 315(1)** provides for the establishment of a Public Service Commission for the Union and a separate Commission for each State, while **Article 315(2)** allows for a Joint Public Service Commission for two or more States if they so consent. The framers of the Constitution thus institutionalised a dual framework, the **UPSC** at the national level and **State PSCs** at the sub-national level, to ensure that the federal distribution of power extended to recruitment governance as well⁴.

The composition of these Commissions reflects a deliberate attempt to balance expertise and independence. As per **Article 316(1)**, the Chairman and other members of a PSC are appointed by the President in the case of the Union and by the Governor in the case of a State. The

⁴ Constitution of India, arts. 315–323.

members generally hold office for a term of six years or until attaining the age of 65 years (in the case of the UPSC) or 62 years (in the case of a State PSC), whichever is earlier. Removal is permissible only on limited grounds specified under **Article 317**, such as misbehaviour, incapacity, or insolvency, and requires a formal inquiry by the Supreme Court. These constitutional safeguards ensure that members are not susceptible to arbitrary dismissal, thereby protecting the Commission's institutional autonomy.

The functions of PSCs, outlined in **Article 320**, encompass conducting examinations for appointments to the services of the Union and the States, advising on matters relating to recruitment, promotion, transfers, disciplinary cases, and any other service-related issues referred to them. The framers intentionally used the word “*shall*” in clauses (1) and (3), making consultation with the Commission obligatory on core recruitment matters. Yet, it must be noted that the **advice tendered by PSCs is recommendatory**, not binding, on the executive; this subtle design underscores the tension between administrative flexibility and constitutional independence.

The distinction between UPSC and State PSCs lies primarily in their operational scope and autonomy. The UPSC has evolved into a robust institution with professional staff, digital infrastructure, and minimal political interference. In contrast, several State PSCs continue to struggle with administrative constraints, limited resources, and politicised appointments, which dilute their independence in practice if not in law. The federal asymmetry inherent in India's governance structure makes this divergence inevitable, but it also highlights the need for harmonised standards of functioning across States.

Judicial interpretation has consistently underscored the independent status of PSCs as constitutional bodies. In the case of *In re: Dr Ram Ashray Yadav, Chairman, Bihar Public Service Commission*⁵, the Supreme Court observed that the independence of the Commission is essential for maintaining the purity of public administration and that its members cannot be treated as ordinary government servants.² Similarly, in *Union of India v. R. Gandhi*⁶, the Court, while discussing the autonomy of tribunals, reaffirmed that anybody exercising quasi-judicial or constitutional functions must be insulated from executive control to preserve public

⁵ Special Reference No. 1 of 1997 (with I.A. No. 2), decided 29 March 2000; reported as (2000) 4 Supreme Court Cases 309.

⁶ (2010) 11 SCC 1.

confidence in its impartiality.³ These judgments extend the broader constitutional principle that *independence is the lifeblood of institutions entrusted with ensuring equality and fairness*. Viewed through this lens, PSCs are not merely administrative agencies; they are institutional safeguards for the constitutional guarantees under Articles 14 and 16. Their proper functioning ensures that the promise of equal opportunity in public employment does not remain a hollow ideal. The framers envisioned these Commissions as a permanent bridge between meritocracy and democracy, independent of political currents yet accountable to the constitutional ethos of justice, equality, and efficiency.

III. EVOLUTION AND ROLE OF STATE PUBLIC SERVICE COMMISSIONS

The evolution of State PSCs in India is deeply rooted in the colonial administrative reforms that sought to professionalise and “Indianize” the civil services. The earliest significant development occurred with the establishment of the Public Service Commission of India in 1926, following the recommendations of the **Lee Commission (1924)**, which recognised the necessity of an impartial body for recruitment based on merit rather than patronage⁷. This marked the first institutional attempt to ensure fairness and uniform standards in public appointments, though the scope of the Commission was limited to higher central services under British control.

The subsequent **Government of India Act, 1935**, represented a major constitutional advance by providing for both a *Federal Public Service Commission* and *Provincial Public Service Commissions*. This introduced the concept of *decentralised recruitment* within a federal framework, foreshadowing the later design of the Indian Constitution. The Provincial Commissions were intended to conduct examinations and advise on appointments to provincial services, laying the groundwork for what would become the State PSCs after Independence.

When the Constituent Assembly deliberated on the draft provisions of *Articles 315–323*, it endorsed this federal arrangement with clarity and conviction. The debates reveal that the framers, including **Dr B.R. Ambedkar** and **K.T. Shah**, viewed State PSCs not merely as administrative adjuncts of the Union but as autonomous constitutional authorities designed to

⁷ Government of India, *Report of the Royal Commission on the Superior Civil Services in India (Lee Commission Report, 1924)*, Cmd. 2128, p. 12, available at https://upsc.gov.in/sites/default/files/SI-019-RprtRoyalCmsnSuperiorCivilSerIndiaLeeComsnRprt-1924_0.pdf (last visited on 30.11.2025).

serve the principle of equality of opportunity under **Article 16**⁸. Ambedkar, in particular, argued that decentralised commissions would better reflect the social and linguistic diversity of India's States while maintaining uniform principles of merit, neutrality, and transparency in recruitment. In the post-Independence era, State PSCs became the primary agencies responsible for conducting examinations and making recommendations for appointments to State civil services, police, education, and other departments. They also perform advisory functions on disciplinary cases and service matters referred by State Governments. Despite their constitutional parity with the UPSC, however, most State PSCs have not enjoyed the same degree of institutional strength or operational credibility. Variations in budgetary allocation, political appointments, and administrative capacity have created a pronounced asymmetry across States.

The contrast between the *UPSC's institutional stability* and the *State PSCs' uneven performance* underscores a persistent governance gap. While the UPSC has institutionalised predictability, transparency, and public trust, many State PSCs continue to face allegations of irregularities and procedural lapses. This unevenness challenges the ideal of a unified, merit-based public service across India. Nevertheless, the constitutional role of State PSCs remains pivotal; they embody the principle of decentralised governance, ensuring that recruitment to State services reflects both local realities and national standards of fairness.

IV. CHALLENGES AND STRUCTURAL DEFICITS IN STATE PUBLIC SERVICE COMMISSIONS

Despite the constitutional design ensuring autonomy and fairness, most State PSCs have struggled to achieve the same institutional integrity and operational credibility as the UPSC. The gap between constitutional aspiration and administrative reality is wide, owing to a series of structural, procedural, and systemic deficiencies that have accumulated over decades. These challenges, which affect recruitment transparency and institutional legitimacy, may be grouped into four major categories: **institutional and governance issues, operational inefficiencies, legal and accountability gaps, and syllabus stagnation.**

⁸ Constituent Assembly Debates, Vol. IX, 30 August 1949, Speech by Dr. B.R. Ambedkar on Draft Article 285 (corresponding to present Article 315) available at https://eparlib.sansad.in/bitstream/123456789/763218/1/cad_01-09-1949.pdf (last visited on 30.11.2025).

i) Institutional and Governance Issues

One of the most persistent challenges lies in the *appointment and composition of State PSCs*. Although Article 316 provides for gubernatorial appointments, the process is often opaque and politically influenced. In the absence of uniform eligibility criteria or independent selection committees, appointments frequently reflect political loyalty rather than administrative competence⁹. *The Second Administrative Reforms Commission (ARC)* has repeatedly emphasised that such politicisation undermines both the perceived and actual independence of these constitutional bodies.

Furthermore, there is *no fixed standard for professional expertise* among members. Some States appoint retired bureaucrats and academicians, while others include individuals with little or no administrative background. This inconsistency has resulted in varying degrees of institutional capacity and integrity. The *Bihar PSC scandal of the late 1990s*, which led to the removal of its Chairman, Dr Ram Ashray Yadav, is a telling example of how compromised appointments can corrode public trust. In that case, the Supreme Court invoked its advisory jurisdiction to uphold the principle that holders of such high constitutional offices must adhere to the highest standards of integrity and impartiality¹⁰.

Another institutional weakness concerns the *absence of a professional secretariat*. Many State PSCs operate with skeletal staff and lack specialised research, legal, and technology divisions. Without adequate institutional memory or technical capacity, they struggle to implement reforms, ensure examination integrity, or modernise administrative procedures.

ii) Operational Inefficiencies

Operational bottlenecks continue to plague State PSCs. One of the most damaging is *poor manpower planning* by State departments. Requisitions for vacancies are often sent late or in fragmented batches, disrupting recruitment schedules and leading to indefinite delays. Unlike the UPSC, which publishes a fixed annual calendar, most State PSCs lack predictable examination timelines. The recurring *paper-leak crises* in States such as Uttar Pradesh, Gujarat, and Telangana reveal deeper systemic weaknesses: insecure printing processes, poor logistics, and insufficient technological safeguards¹¹. These irregularities not only waste public

⁹ Second Administrative Reforms Commission, *Refurbishing of Personnel Administration – Scaling New Heights* (10th Report, Government of India, 2008), pp. 44–45, available at <https://darp.gov.in/en/arc-reports> (last visited on 29.11.2025).

¹⁰ Supra note 4.

¹¹ Gopalakrishna V, “How can State PSCs be reformed?”, *The Hindu*, 24 November, 2025, available at <https://www.thehindu.com/news/national/how-can-state-pscs-be-reformed-explained/article70314087.ece> (last visited on 27.11.2025).

resources but also erode candidates' faith in the impartiality of the recruitment system. Delays in evaluation and result declaration further aggravate unemployment pressures and trigger widespread litigation.

Another chronic issue is the *partial and uneven adoption of technology*. While some PSCs have digitised applications and results, few have moved towards computer-based testing or secure data management systems. The lack of end-to-end digital monitoring leaves room for procedural errors and malpractice.

iii) Legal and Accountability Gaps

The growing frequency of court interventions illustrates a deficit in internal accountability mechanisms. The High Courts and the Supreme Court are routinely approached to resolve disputes over evaluation errors, answer-key discrepancies, or allegations of bias¹². However, judicial remedies are retrospective and case-specific; they cannot substitute for systemic regulation.

Most States *lack codified grievance-redressal procedures* or independent oversight bodies for PSCs. While the Constitution envisages the submission of an annual report to the Governor under Article 323, many States fail to table these reports promptly or debate them effectively in their legislatures. As a result, accountability becomes formal rather than functional.

iv) Syllabus and Content Stagnation

Finally, a significant but often overlooked challenge is the *stagnation of syllabi*. In many States, examination syllabi have not been revised for more than a decade, remaining disconnected from emerging governance themes such as environmental regulation, digital administration, and social-sector management. This mismatch reduces the relevance of assessments and disadvantages candidates trained in contemporary disciplines. Equally problematic is the *lack of State-specific contextualisation*. While the UPSC maintains a national orientation, State PSCs are expected to test candidates' understanding of local governance, regional economy, and social structures. The failure to integrate such content weakens the quality of recruitment and hampers administrative responsiveness at the State level.¹³

Taken together, these challenges demonstrate that the crisis of State PSCs is *systemic, not*

¹² *Rajasthan Public Service Commission v. Harish Kumar Purohit*, (2003) 5 SCC 480.

¹³ *Supra* note 10.

episodic. They stem from an institutional culture that prioritises expediency over constitutional ethos. Reform, therefore, must go beyond technical fixes; it must re-anchor PSCs in their original constitutional mandate of merit, fairness, and accountability. Unless their governance, procedures, and evaluation systems are modernised in both spirit and structure, the credibility of public recruitment at the State level will continue to erode.

V. REFORM PROPOSALS: TOWARDS A FRAMEWORK FOR CHANGE

The need to revitalise State PSCs is no longer a matter of administrative choice but a constitutional necessity. Their credibility and functionality determine the legitimacy of public recruitment across India. Reform, therefore, must be holistic, addressing institutional design, procedural integrity, technological modernisation, curricular renewal, and cooperative federalism. The following framework outlines a roadmap for systemic transformation.

i) Institutional Reforms

The first imperative is *to strengthen the institutional architecture* of State PSCs. The **Second ARC** recommended creating a *State Department of Personnel and Administrative Reforms* in every State, responsible for manpower forecasting and coordination of recruitment calendars¹⁴. This would allow PSCs to function in a predictable and time-bound manner rather than in response to irregular requisitions from departments.

Appointments to PSCs should be professionalised through *transparent selection mechanisms*. A collegium system, comprising *the Chief Minister, the Chief Justice of the High Court, and the Leader of Opposition*, may be considered to depoliticise appointments¹⁵. The eligibility criteria must ensure that members possess at least two decades of public administration or academic experience and are free from partisan affiliation. Tenure and age norms should also be standardised: six years or until the age of sixty-five years for Chairpersons and sixty-two years for Members, as originally envisaged under Article 316(2). The Commission's *annual report under Article 323* should be mandatorily tabled before the legislature within six months, accompanied by an *Action-Taken Memorandum* to ensure follow-through on its recommendations.

¹⁴ Supra note 8. pp. 56–58, available at <https://darp.gov.in/en/arc-reports> (last visited on 29.11.2025).

¹⁵ Supra note 4.

ii) Procedural and Examination Reforms

Procedural integrity lies at the core of institutional credibility. Every State PSC must publish *an annual recruitment calendar*, with examination and interview timelines announced at least one year in advance. This measure, successfully adopted by the Kerala and Tamil Nadu PSCs, enhances predictability. Question-paper security must be strengthened through multi-stage paper-setting, digital encryption, and randomisation of question banks¹⁶. The *Union Public Service Commission's 2017 Examination Reforms Guidelines* provide a replicable model, emphasising secure transmission and multi-level moderation¹⁷.

Evaluation reforms are equally crucial. Adoption of anonymised bar-coding, double evaluation, and digital mark-entry systems can reduce human error and bias. PSCs should also introduce a *public disclosure protocol* for answer keys and moderation rules within a fixed challenge window to ensure procedural fairness. A *time-bound grievance redressal mechanism*, ideally through an online portal monitored by an independent review panel, must be instituted in every State. Such procedural transparency will reduce litigation and restore trust among candidates.

iii) Technological Modernisation

The integration of technology into recruitment is indispensable for ensuring integrity and efficiency. States must move toward *computer-based testing (CBT)* where feasible, with adequate safeguards for data security, server redundancy, and proctoring. Modern tools like AI-assisted plagiarism detection and statistical item analysis can help moderate question papers and detect anomalies post-examination.

To foster transparency, each PSC should maintain a *Digital Dashboard* displaying recruitment statistics, pending examinations, and stage-wise progress of results. The dashboard should also archive previous question papers, cut-offs, and litigation summaries. This open-data approach aligns with the principles of *Right to Information (RTI)* and participatory governance¹⁸.

¹⁶ P. Sujatha Varma, "APPSC proposes reforms to strengthen examination system, recruitment standards", *The Hindu*, 09 October 2025, available at <https://www.thehindu.com/news/national/andhra-pradesh/appsc-proposes-reforms-to-strengthen-examination-system-recruitment-standards/article70143539.ece> (last visited on 29.11.2025).

¹⁷ Union Public Service Commission, *Guidelines on Examination Reforms and Security Measures*, New Delhi (2017) available at <https://upsc.gov.in/sites/default/files/68rh-AnnualReport-2017-18Eng1160719.pdf> (last visited on 30.11.2025).

¹⁸ Ministry of Personnel, Public Grievances & Pensions, *Right to Information Act, 2005: Implementation Guidelines* (DoPT Circular 2021), available at <https://dopt.gov.in/guidelines-on-rti> (last visited on 30.11.2025).

iv) Curricular and Academic Reforms

Examination syllabi must evolve with the changing contours of public administration. Every five years, PSCs should conduct a *structured syllabus review* in consultation with universities, subject experts, and senior civil servants. The revised syllabi must strike a balance between **UPSC parity**, for maintaining national standards, and **State specificity**, reflecting local governance, economy, and socio-cultural contexts. The inclusion of papers on *constitutional values, ethics in administration, and citizen-centric governance* will help promote the constitutional ethos of justice and accountability. Furthermore, continuous orientation programmes for examiners and evaluators should be institutionalised to maintain uniformity of assessment.

v) Federal Coordination

Finally, reforming State PSCs requires a cooperative federal approach. The *Department of Personnel and Training (DoPT)* should establish a *National Repository of PSC Guidelines*, consolidating model protocols on recruitment, moderation, and grievance procedures. Periodic *All-India Conferences of PSCs*, similar to the one convened annually by the UPSC, would enable knowledge sharing and cross-learning among States. The Union Government must, however, exercise a facilitative rather than supervisory role. The goal is not centralisation but harmonisation, achieving high standards while preserving State autonomy. A *National Council for Public Service Reforms*, comprising representatives from UPSC, DoPT, and State PSCs, could coordinate reforms, monitor implementation, and issue advisory standards.

The reform of State PSCs must proceed on twin principles, viz., *constitutional autonomy and administrative accountability*. By institutionalising transparent recruitment, standardised evaluation, technological integration, and cooperative federalism, India can restore the constitutional promise of merit-based public employment. These reforms are not merely administrative adjustments; they reaffirm the constitutional morality that links opportunity with fairness and governance with justice.

VI. BALANCING AUTONOMY AND ACCOUNTABILITY:

RECLAIMING THE CONSTITUTIONAL SOUL OF PSCS

The credibility of Public Service Commissions (PSCs) depends fundamentally on their ability to maintain *autonomy without isolation*. Autonomy is not a privilege but a constitutional instrument for ensuring integrity in governance. Yet, absolute autonomy without accountability

risks institutional inertia, while excessive control by the executive undermines independence. The challenge, therefore, lies in striking a delicate constitutional equilibrium between freedom of functioning and responsibility to the public. The framers of the Constitution envisaged PSCs as independent constitutional bodies, insulated from political influence yet responsive to the ideals of justice, equality, and merit. This dual obligation finds expression in Articles 14 and 16, which guarantee equality before the law and equality of opportunity in public employment¹⁹. These provisions form the moral compass guiding PSCs: every reform, procedure, or examination policy must uphold both the efficiency of the State and the dignity of equal access.

Judicial interpretation has consistently reinforced this vision. In *State of Haryana v. Haryana Public Service Commission*²⁰, the Supreme Court observed that while PSCs enjoy functional autonomy, they remain “amenable to judicial scrutiny where constitutional or statutory mandates are transgressed.” This recognition of conditional independence underscores the constitutional principle that autonomy is a means to accountability, not an escape from it. The broader philosophical foundation of this balance is captured in Dr B.R. Ambedkar’s observation during the Constituent Assembly Debates that “*independence in administration must coexist with responsibility to the Constitution*²¹”. Autonomy, in this sense, must be complemented by transparency—through annual reports, public disclosure of results, and legislative oversight. Simultaneously, the State must refrain from executive interference in appointments, transfers, or procedural matters, for such intrusion erodes institutional integrity. Ultimately, PSCs are not merely examination-conducting agencies; they are *constitutional guarantors of administrative justice*. Their functioning reflects the moral fibre of India’s bureaucracy and the sincerity with which the State honours its commitment to fairness. A reformed PSC structure that harmonises autonomy with accountability will thus not only strengthen recruitment systems but also reaffirm the constitutional ethos of equality, merit, and rule of law, the very foundations upon which the Republic rests.

VII. CONCLUSION

The author concludes that reforming the State PSCs is not merely an administrative necessity but a constitutional imperative. As institutions created to safeguard equality of opportunity and

¹⁹ Constitution of India, arts. 14 and 16.

²⁰ (2004) 13 SCC 43.

²¹ Supra note 7.

impartiality in public employment, PSCs are integral to the moral and structural fabric of the Indian Republic. Their functioning directly reflects the State's commitment to fairness, transparency, and meritocracy—values enshrined in Articles 14 and 16 of the Constitution. However, recurrent controversies, examination irregularities, and judicial interventions reveal a troubling erosion of credibility and institutional discipline within many State PSCs. The author suggests that a genuine transformation requires a *comprehensive, multi-dimensional reform framework*. Structural changes such as the professionalisation of appointments, clearly defined eligibility criteria for members, and institutionalised tenure norms must be accompanied by procedural and technological modernisation. The introduction of secure computer-based examinations, double evaluation systems, and transparent grievance mechanisms will go a long way in strengthening public confidence. Similarly, regular syllabus revision and inclusion of papers on ethics, constitutional values, and governance are essential to ensure that recruitment processes remain aligned with contemporary administrative realities. Further, the author believes that true reform must balance *autonomy with accountability*. PSCs must be insulated from political interference but remain answerable to the Constitution, the Legislature, and the public they serve. Annual reporting, open data dashboards, and legislative debates on PSC performance can create a culture of transparency without undermining institutional independence. At the same time, the Union and State Governments must collaborate, through a national council or repository of best practices, to harmonise standards without eroding federal diversity.

In conclusion, the author asserts that revitalising State PSCs is a moral and constitutional obligation. Strengthening these bodies would reaffirm India's faith in merit-based governance and institutional integrity. The author thus concludes that rebuilding the credibility of PSCs is not just about improving recruitment efficiency—it is about renewing the Republic's foundational promise: that public service shall remain a domain of fairness, competence, and constitutional justice.