



# **MOHINI JAIN V. STATE OF KARNATAKA (1992)**

*Constitutional Interpretation & Basic Structure*

## **PRELIMS SNAPSHOT**

### ◆ 1. Prelims Snapshot (Fact Box)

- 📅 Year: 1992
- ⚖️ Case: Mohini Jain v. State of Karnataka
- 👤 Bench Strength: 2 Judges
- 📖 Key Articles Involved: Article 14, Article 21, Article 41, Article 45
- 🧠 Doctrine Evolved: Right to education is part of the Right to Life; Capitation fees violate equality
- 💬 Famous Line: "Right to education flows directly from the right to life."

## **CONTEXT & BACKGROUND**

Mohini Jain, a medical aspirant from Uttar Pradesh, was denied admission in a Karnataka private medical college due to her inability to pay exorbitant capitation fees. She challenged the Karnataka Educational Institutions (Prohibition of Capitation Fee)



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Act, 1984, claiming it allowed discriminatory access to education based on wealth.

The case raised a larger constitutional question: Is education a Fundamental Right, and can the State permit economic barriers to it?

### **CONSTITUTIONAL ISSUES RAISED**

- Does the right to education form part of the right to life under Article 21?
- Do capitation fees violate Article 14 (equality) by creating a privileged access system ?
- Is education merely a Directive Principle or an enforceable right?

### **VERDICT & RATIO DECIDENDI**

The Supreme Court held that:

- Right to education is implicit in the right to life and dignity under Article 21
- The Constitution mandates that education must be available to all, irrespective of financial status



- Charging capitation fees makes education a commodity, violating equality under Article 14
- The Court ruled that State obligation to provide education is enforceable even without Article 21A (which was added later)
- This case was the first to recognise education as a Fundamental Right before being refined by Unni Krishnan (1993).

## **DOCTRINE / PRINCIPLE EVOLVED**

- Right to education is part of Article 21
- Access to education must be equal and affordable
- Profit-driven education undermines constitutional values of social justice





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## IMPACT & LEGACY

- Set the constitutional foundation for recognising education as a Fundamental Right
- Paved the way for Unni Krishnan (1993) and later the 86th Constitutional Amendment (2002)
- Sparked nationwide debate on capitation fees, commercialisation, and regulation of private institutions
- Became an early judicial affirmation of socio-economic rights within Fundamental Rights framework



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## RELEVANCE FOR UPSC

- GS Paper 2:
  - Educational rights and state obligations
  - Constitutional ethics in welfare delivery
- GS Paper 4 (Ethics):
  - Equality, justice, fairness in access to opportunity
- Essay Paper:
  - Apt for topics on Education as Empowerment, Rights vs. Markets, Social Equity through State Action
- UPSC Interview:
- Useful in discussions on private education regulation, constitutional rights, and education-sector reforms

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