

BEFORE THE MADURAI BENCH OF MADRAS HIGH COURT

RESERVED ON : 25.02.2026

DELIVERED ON : 11.03.2026

CORAM:

THE HONOURABLE MR.JUSTICE **B.PUGALENDHI**

WP(MD)No.2673 of 2026

&

WMP(MD)Nos.2267, 2269, 2270, 2274 of 2026

1.B.Gurusamy

2.S.Anandaraja

: Petitioners

Vs.

1.The Director General of Police / Chairman,
Tamil Nadu Uniformed Services Recruitment Board,
Old Commissioner of Police Complex,
Pantheon Road, Egmore, Chennai – 600 008.

2.The Member Secretary,
Tamil Nadu Uniformed Services Recruitment Board,
Pantheon Road, Egmore, Chennai – 600 008.

3.The Superintendent of Police,
Tirunelveli District, Tirunelveli.

4.The Superintendent of Police,
Tenkasi District, Tenkasi.

: Respondents



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PRAYER: Petition filed under Article 226 of the Constitution of India seeking issuance of a Writ of Certiorarified Mandamus calling for the records relating to the impugned notification No.1 of 2025 published by the second respondent dated 04.04.2025 for direct recruitment to the post of Sub Inspector of Police 2025 insofar as it relates to Part II Main Written Examination Part B (Psychology Test and Communication Skills) and subsequent publication of result of the impugned Provisional Selection List SI 2025 by the second respondent through online dated Nil on the ground that the same was done with deviation from syllabus, sudden change in the exam pattern particularly omission of the Tamil Language questions in the Part II Main Written Examination held on 21.12.2025, quash the same and consequently, directing the second respondent to conduct fresh examination or re-evaluate the Part II Main Written Examination in accordance with the official syllabus based on the petitioners' representations dated 06.01.2026 and 23.01.2026.



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For Petitioners : Mr.N.Marimuthu

For Respondents: Mr.Veera Kathiravan,
Additional Advocate General

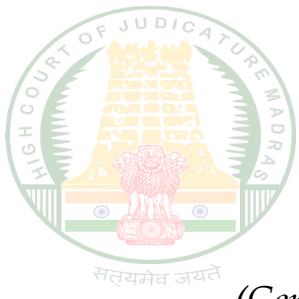
Assisted by
Mr.C.Venkatesh Kumar,
Special Government Pleader

ORDER

This writ petition is filed as against the notification dated 04.04.2025 issued for the recruitment of Sub Inspector of Police and the provisional selection list published by the second respondent.

2.The second respondent / Tamil Nadu Uniformed Services Recruitment Board has issued a notification on 04.04.2025 for the recruitment to the post of Sub Inspector of Police. These writ petitioners have applied for and attended the exams conducted pursuant to the notification. As per the notification, the pattern of examination is as under:

(1) Part-I – Tamil Eligibility Test consisting of 100 questions for 100 marks. The candidates who obtain the minimum marks of 40 will become eligible for evaluation of their main written examination.



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(2) *Part-II – consisting of main written examination of Part-A (General Knowledge) and Part-B (Psychology) carrying a total of 70 marks. The candidates are required to obtain a minimum of 25 marks to qualify this main written examination and based on these marks, the candidates are invited for certificate verification and physical endurance test.*

3. According to the petitioners, the syllabus for Part-B of Part-II of the main written examination includes the testing of communication skills of the candidates in effective usage of Tamil and English Language. However, in the question paper for Part-B of Part-II of the main written examination for the present year, questions with respect to the effective usage of Tamil Language have been omitted and the same has been replaced with 10 psychology related questions.

4. Learned Counsel for the petitioners pointed out that the question papers for the examinations conducted during the year 2022 and 2023 included 10 questions specifically related to the effective usage of Tamil Language. However, the examination pattern has been changed this year



against the syllabus and previous year question papers. The petitioners, who had a legitimate expectation that the questions would be asked as per the syllabus and the pattern of the previous years, have lost marks as a result of the change in the examination pattern. Therefore, he prayed for appropriate orders.

5. On the other hand, it is submitted by the learned Additional Advocate General that preference has been given exclusively for Tamil Language in the Tamil Language Eligibility Test conducted in Part-I for 100 marks. Therefore, the knowledge and the proficiency of the candidates in Tamil have already been tested in Part-I of the examination.

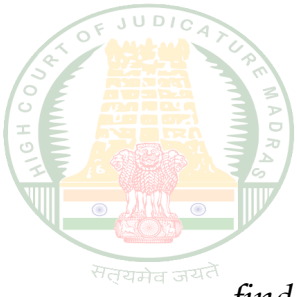
6. He further submitted that the Tamil Nadu Police Subordinate Service Rules only prescribes the conduct of a written examination for 70 marks and the Rules do not mandate a detailed syllabus or require the inclusion of questions from every component. The syllabus, which was issued, was only indicative in nature and meant to guide the candidates



regarding the broad areas of preparation. The syllabus only provided that effective use of Tamil and English Languages “will be” tested, which is a predictive phrase and not binding in nature. The inclusion or exclusion of particular types of questions within the framework of the syllabus is within the discretion of the recruiting authority and therefore, the doctrine of legitimate expectation would not arise in the present case. Hence, he prayed for dismissal.

7.This Court considered the rival submissions made on either side and also perused the materials placed on record.

8.The second respondent / Tamil Nadu Uniformed Services Recruitment Board has issued a notification on 04.04.2025 for the recruitment to the post of Sub Inspector of Police. As per the examination pattern, Part-B of Part-II of the main written examination carries 30 marks for 60 objective type questions with each question carrying half a mark. The Syllabus prescribed for Part-II of the main written examination is extracted as under:



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“i. Logical Analysis: Analysis of any information logically to find out various dimensions of the information.

ii. Numerical Analysis: Quick response with regard to the numerical ability will be tested.

iii. Communication Skills: Effective usage of Tamil and English Languages will be tested.

iv. Information Handling Ability: For any given information, various aspects of the information, inferences and connected facts will be tested.

v. Mental Ability: To test the candidate's ability to draw conclusions through inductive or deductive reasoning.”

9. Admittedly, the question papers for Part-B of Part-II of the main written examination conducted during the years 2022 and 2023 included 10 exclusive Tamil questions testing the language, synonyms and the meanings for various Tamil words and these questions were not asked in English language. However, in the examination conducted during the year 2025, these questions have been replaced by questions related to logical reasoning such as number sequencing, code words, statements and conclusions and mathematical questions. Therefore, the petitioners claim that their legitimate expectation has been defeated.



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10. Since the claim of the petitioners is based on the doctrine of legitimate expectation, it would be relevant to refer to the decision of the Hon'ble Supreme Court in *Union of India & Others v. Hindustan Development Corporation & Others* [(1993) 3 SCC 499], wherein it was held that the legitimacy of an expectation can be inferred only if it is founded on the sanction of law or custom or an established procedure followed in regular and natural sequence. It cannot be based on a wish or desire or hope and it should be based on a legal obligation.

11. In the present case, it is pertinent to note that the notification does not prescribe that the examination pattern of the previous years would be followed in the present year as well. Since the setting of syllabus is within the discretion of the recruiting authority, no legitimate expectation can be claimed that the same pattern would be followed every year.



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12. Moreover, the questions replacing the exclusive Tamil language questions are questions related to logical reasoning such as number sequencing, code words, statements and conclusions and mathematical questions, which are also included in the syllabus of Part-B. Therefore, even though the specific questions from Tamil language have not been included in the question paper, the replaced questions are within the broad syllabus prescribed by the Board.

13. To be noted, the syllabus does not provide the break-up of the components within Part-B (Psychology Test) and as such, the candidates are expected to prepare for all the components. It is not the case of the petitioners that questions totally out of the scope of the syllabus have been included in the question papers, warranting the interference of this Court.

14. As held by the Hon'ble Supreme Court in *Ran Vijay Singh v. State of UP* [(2018) 2 SCC 357], the scope for High Courts to interfere in



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academic matters is limited and they can permit re-evaluation or scrutiny of the answer sheet in rare or exceptional cases, only if it is demonstrated that a material error has been committed. The Hon'ble Supreme Court further held that the entire examination process cannot be derailed, merely because some of the candidates are disappointed or dissatisfied or perceive some injustice having caused to them by an erroneous question or erroneous answer.

15.For the reasons aforesaid, this Court is not inclined to entertain this writ petition. However, it must be pointed out that a horizontal reservation of 20% is provided for Persons Studied in Tamil Medium (PSTM) as per the notification. The objective of this policy is to support the candidates who have studied in Tamil Medium. Therefore, it would be appropriate if exclusive Tamil questions are also included in the main examination, in future, to support this objective.

16.With the fond hope that the above suggestion would be taken into account while setting question papers in the future, this writ



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petition is dismissed. There shall be no order as to costs. Consequently,

connected miscellaneous petitions are closed.

Internet : Yes
gk

11.03.2026

To

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Tamil Nadu Uniformed Services Recruitment Board,
Old Commissioner of Police Complex,
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B.PUGALENDHI, J.

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