

Background Note:

1. Credible and timely elections strengthen people’s faith in democracy. In the long, inter-connected and complex processes from electoral registration to the event of poll and then to smooth counting leading to declaration of results, even one procedural infirmity, a single act of negligence, or one unattended lapse can result into a total failure, which is incurable, expensive, and which dents the whole system of electoral management.

2. The Constitution of India has created the Election Commission of India with sufficient powers to conduct free and fair elections to the Parliament and the Legislature of every State. The task though is gigantic. Even the best plans of managing logistics, personnel, materials and security may not be adequate for conduct of a perfect election spread over the vast territories of our country, where over 835 million electors participate at over a million polling stations, facilitated and protected by about 10 million personnel. The scales of operations are sky-high; the need to be fool-proof is as paramount. All risks – experienced, perceived, or imagined – need to be prevented, regulated, or eliminated. In short, there is no second chance in conduct of a successful election.

3. Risks

Electoral cycle wise risks, that may be encountered by field machinery have been listed. Altogether 175 risks are listed amongst all aspects of electoral management. In each aspect, the risks, common and probable, are listed. The list of risks as identified and the mitigation strategy are given in Table 1.

Table 1: List of risks

Pre-announcement Phase

| Work Area | Risk Identified | Mitigation Measures/ Action (Points) |
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| 1. Organising CEO’s Office for efficient team – work | 1.1 Inadequate Staff | Identify personnel of choice and get them posted to CEO’s office |
| | 1.2 Undesirable personnel | Those who are not dedicated enough for the public cause need to be replaced |
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| 2. Energising SLA | 2.1 Non – specified tenure of agreement | Agreement with SLA needs to be checked for a secured tenure. |
| | 2.2 Non-existent performance-indicators. | Performance-based conditionalities to be put. |
| | 2.3 Unprofessional agreement-clauses. | Individual clauses should be revisited and vetted for enhanced effectiveness. |
| | 2.4 Turnover of programmers at State/District levels. | Qualification and tenure of individual key personnel to be prescribed. |
| | 2.5 Ineffective communication of SLA with the Data Entry Operators | Regular monitoring of the work of District Programmers and Data Entry Operators to be mandated in the SLA |

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| | with EROs/DEOs. | agreement. |
| Work Area | Risk Identified | Mitigation Measures/ Action (Points) |
| 3. Office infrastructure Hardware | 3.1 Dysfunctional communication channels. | Testing telephone & fax lines and obtaining additional dedicated fax lines. |
| | 3.2 Inadequate numbers/capacity of servers. | Make a realistic check of and procure the required server capacity for safe and efficient storage, processing and copying of electoral rolls database. |
| | 3.3 Non-existent / unreliable disaster recovery system. | Ensuring that a dependable DR system is in place, with due certification from an external agency like NIC. |
| | 3.4 Excessive dependence on outside support for routine necessary activities such as videoconferencing. | Either mandating NIC to prioritise election-related video conference, or asking State network to make a reliable video-conference facility. |
| 4. Posting of Election Officers | 4.1 Vacancies of ROs and EROs. | Identify and assess the vacancy position with respect to the previously notified lists of Returning Officers / Assistant ROs, Electoral Registration Officers / AEROs. |
| | 4.2 Incumbents likely to retire. | List of such officers as are working in election-related posts, but are likely to retire around election time to be kept ready. |
| | 4.3 Postings with actual or perceived bias. | In key positions of DEOs and ROs, changes made by the State Government which can be seen as biased, to be scrutinized with due diligence. A ready list of officers of equivalent ranks and having good reputation to be kept ready. |
| 5. Adequate and timely financing | 5.1 Inadequate budget provision for preparatory activities. | Depending on the probable schedule of elections, budget allocation to be made for preparatory activities such as electoral roll revision, transportation and preparation of EVMs, etc. |
| | 5.2 Non-submission of realistic budget requirement for conduct of elections. | For the financial year that will actually have polls, adequate provision to be made, after due extrapolation of the previous poll expenditure. |
| | 5.3 Missing out provisions in non-election heads. | Necessary extra budget-allocation to be made in budget heads related with Home and Transport for election expenditure on security and transport arrangements. |

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| | 5.4 Delayed submission of expenditure-accounts/audit certificates, obstructing further releases. | Settling all pending accounts and audit issues as well as submitting timely estimates for projected expenditure. |
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Pre- Announcement Phase- Electoral Roll, Polling Stations

| Work Area | Risk Identified | Mitigation Measures/ Action (Points) |
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| 6. Fidelity of Electoral Rolls | 6.1 Non-inclusion of eligible persons. | Adequate outreach programmes to be conducted. |
| | 6.2 Inadvertent deletions. | Deletion lists to be published, shared and communicated wherever feasible |
| | 6.3 Deliberate exclusion of certain sections and areas. | Appropriate publicity and efficient grievance-redressal system. |
| | 6.4 Possibility of motivated deletions. | Abnormal deletions, section-wise and part-wise, to be scrutinized. |
| | 6.5 Inclusion of ineligible electors. | Cross-verification, random checks and complaint-monitoring systems to be established. |
| | 6.6 Repeated entries. | Scrupulous adherence to de-duplicating checks to be ensured. |
| | 6.7 Double registration in bordering constituencies. | Electoral rolls of bordering constituencies to be compared; special communication drive in border habitations. |
| 7. Efficiency and motivation of registration staff like BLOs and Data Entry Operators | 7.1 Untrained and uninspired staff committing mistakes such as unfilled Part IV in Form VI, insufficient documents taken, not giving acknowledgements, blank fields. | Adequate training to be given for avoiding errors and mistakes, appropriate levels of supervision. |
| | 7.2 Delegating without authority for bulk submission of forms. | Proper identification- cards/badges to be issued to BLOs and Data Entry Operators. |
| | 7.3 Incorrect field – verification by BLOs. | Ensuring one-to-one coordination between BLOs and BLAs, involving RWAs in verification. |
| | 7.4 Delay in submission of field- inputs giving scope for repeated Form-6. | Time-lines to be set and checked. |
| 8. Ensuring fundamentals of eligibility – | 8.1 Possibility of inclusion of foreign nationals. | The importance of unambiguous clarity on citizenship requirements to be communicated to EROs. |

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| citizenship, age, and ordinary residence | 8.2 Lack of vigilance in non-border cities in registering electors. | First-time electors to be scrutinized with elaborate cross-checking of documents. EROs to be briefed about their authority to reject Form-6 on not being personally satisfied. |
| | 8.3 Registration of under-age persons. | Birth documents to be checked in case of young applicants. |
| | 8.4 Non-residents may get registered. | Physical verification by BLO to be a must before considering acceptance of Form-6; cross-checking with neighbours, verifying other documents, and checking about possible repeated entries in adjoining constituencies should be done. |
| Work Area | Risk Identified | Mitigation Measures/ Action (Points) |
| 9. Digital security of electoral registration | 9.1 Misuse of digital signature by ex-staff. | Immediate surrender of digital signature and change of password on a change of data entry operators. |
| | 9.2 Bulk submission by misusing digital signature. | Programmed controls on bulk submission of i-Forms. |
| | 9.3 Unauthorised operations on behalf of the EROs by Data Entry Operators. | Bio-metric identification of EROs/AEROs; frequent changing of passwords; surprise checking of audit trails. |
| 10. EVM Security and Management | 10.1 Hazards of collecting and transporting EVMs from numerous source stations. | EVMs from small warehouses can be pooled at a few central places by the host state for safer and more convenient picking up by the borrowing state. |
| | 10.2 Damages to EVMs in long transport. | Regional centres can be proposed for EVM exchanges. |
| | 10.3 Inadequate and unsafe storage of EVMs. | Dedicated warehouses to be built, with required security features. |
| | 10.4 Thin margins of EVM reserves. | Adequate numbers to be supplied so as to have 10% reserves; and FLC failures to be minimized with better technical support. |
| | 10.5 Design hazards: assembled batteries in VVPAT, huge weight of VVPAT. | Continuous checking of EVM & VVPAT machines for technical improvements. |
| | 10.6 Unused expirable items like VVSAT printing paper, power-pack, etc. | Centralised stock-keeping is needed at ECI level to track the unused consumables and transfer to the poll-going states. |
| | 10.7 Accumulating e-waste | Guidelines to be formulated for safe and environment friendly disposal of e-waste, including re-use or re-cycling. |

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| | 10.8 Hastily assembled, inadequate technical manpower to supervise EVMs. | BEL & ECIL to be mandated to deploy the necessary numbers of adequately trained personnel for EVM-testing and managing. |
| Work Area | Risk Identified | Mitigation Measures/ Action (Points) |
| 11. Material Procurement | 11.1 Doubtful efficacy of indelible ink. | Random sample-checks to be made more elaborate; quality-checking by third party; final payment may be linked to a complaint-free performance of ink. |
| | 11.2 Possibility of delay in supply of security seals. | Centralised procurement, depending on poll-schedules in various states. |
| | 11.3 Non-standard voting compartments. | State-wise agencies can be decided centrally, prescribing standards. |
| | 11.4 Compromise on quality and increase in costs on account of decentralized procurement of election materials. | For as many standard and common items as feasible, centralized procurement decisions should be taken to get quality items at competitive rates. |
| 12. Legal readiness | 12.1 Possibility of litigation by affected personnel due to transfers / postings. | A competent legal team to be kept ready to attend the court-matters, particularly in High Court / Tribunals, promptly and effectively. |
| | 12.2 Diversion of CEO's attention on personnel-related litigation. | Recruit / hire a legal adviser who should have experienced in election-related matters, and who should be in continuous touch with the legal team for courts. |
| | 12.3 Pending cases coming up during election-time. | A review of all old and undisposed matters must be done to ensure timely action in all pending cases so that attention is not diverted on avoidable matters during election-time. |
| | 12.4 Inadequate understanding of legal consequences in respect of errors committed in statutory matters. | DEOs and ROs to be given special training on various aspects of statutory work of conducting elections so that mistakes and errors are prevented. |
| 13. Establishing polling stations | 12.1 Notifying buildings no more in use. | Field-verification by Returning Officer/ARO should be done along with consulting the database maintained by the Departments concerned like Education. |
| | 12.2 Notifying buildings likely to be demolished. | Maintenance divisions of the owner departments to be contacted to avoid such structures. |
| | 12.3 Delapidated and unsafe buildings. | Physical inspection of the building should be supported by photographs with time/date. |

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| | 12.4 Remoteness of polling stations or natural barriers obstructions. | If the location is very remote or difficult to access, a more conveniently located building should be proposed, or in extreme cases, temporary structures can be proposed with due safety measures. |
| | 12.5 Vulnerability of polling stations. | Analysis of vulnerability of polling stations should be done well in advance, along with the mapping of vulnerable areas. |
| | 13.6 Housing Polling Stations in private buildings with possibility of allegations. | While grant-in-aid private institutions can be considered, unaided private institutions should be used only after due diligence about the institution's affiliations, and after exhausting all possible government or semi-government structures. |
| | 13.7 Lack of minimum facilities at Polling Stations. | Polling Stations with non-existent or little facilities should be marked and notified to the concerned government department for completing necessary repairs in time. All such building must be subjected to one more physical verification before it is proposed as a polling station. Photographs of such buildings, before and after repairs, should be maintained. |
| | 13.8 Connectivity of Polling Stations. | All possible means need to be deployed so as to ensure that every polling station is in some way connected. In case of severely remote locations, alternative ways such as deploying HAM Radio operators, police wireless coverage, etc. to be explored. |

Pre- announcement phase- Model Code of Conduct

| Work Area | Risk Identified | Mitigation Measures/ Action (Points) |
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| 14. Public places defacement & publicity | 14.1 Precious time may be lost in identifying places where either with or without permission, political photos have been displayed. | Revenue, Municipal and Panchayat authorities should be conveyed a month before the likely announcement of poll-schedule, to take a stock of illegal posters and hoardings. Activation of SOP on MCC 72 hours. |
| | 14.2 Departments / Institutions take a lot of time in covering removing government programme | All departments to be advised in advance to identify such publicity-material and start preparations for removal/concealment. |

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| | 14.3 Departmental web-sites take time in removing political photographs. | All departments to be informed prior to schedule announcement about the need to identify such publicity material and be prepared for corrective action. |
| | 14.4 Running advertisements, escalating to even the day of announcement of polls. | Government department should be briefed that necessary advertisements should be got published well before the likely time of election-announcements. |
| Work Area | Risk Identified | Mitigation Measures/ Action (Points) |
| 15. Code of Conduct in letter and spirit | 15.1 Motivated releases of funds or announcements of schemes on the day of poll-announcement. | While the Government department cannot be informed about the likely date of poll-announcement, a direct meeting with all Department Secretaries and Heads of Departments to convey the letter and spirit of the Model Code of Conduct will prevent unintentional mistakes, and control possible breach of model code. |
| | 15.2 Large-scale transfers on or just before poll-announcement. | A similar communication on personnel matters is necessary. In case of such transfers at the last moment, lists of all these cases to be kept ready for review. |
| | 15.3 Board meetings and decision on tenders on the date of poll-announcement. | Government departments, Boards and corporations can be asked to submit major policy decisions taken on the date of poll-announcement, with a copy of proceedings mentioning the official timing of the meeting. |

Announcement & Conduct of Poll

| Work Area | Risk Identified | Mitigation Measures/ Action (Points) |
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| 16. Poll-schedule announcement | 16.1 State-specific festivals may get left out. | Particular care to be taken while communicating the calendar of examinations, festivals, holidays to the Commission. |
| | 16.2 Adjoining religious days, though not public holidays, also affect public, and particularly government women employees. | As far as practicable, adjoining days of a public holiday to be avoided for poll-day. |

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| | 16.3 Missing out on important messages from the Election Commission media meeting. | CEOs should address the media on the same day of announcement, but after a reasonable gap of the ECI briefing, so that neither the electoral machinery nor the media miss out on any important messages from the Commission. |
| | 16.4 Possibility of mistakes or contradiction in state level communication. | It is advisable to use the Press Note issued by the Election Commission for the first communication of election schedule, though the material may be got translated into the state language also. |
| Work Area | Risk Identified | Mitigation Measures/ Action (Points) |
| 17. Media communication | 17.1 Gaps in communication cause uncertainty, confusion and rumours. | Lack of universal application of instructions and perception in media are risks. Therefore, media briefing must be done on every working day at a pre-fixed time by the CEO or the next senior most office till the polls are over. |
| | 17.2 Confidential information must not be leaked. | Number of CAPF companies, routes of force-movement, places of their accommodation, must never be shared with media. This principle should be separately conveyed to the State Police HQ so that no unintentional information of sensitive nature is made public. |
| | 17.3 Unconfirmed information about seizures or police cases may be interpreted as bias. | Every individual report of seizure or violation of code of conduct must be got verified through the Returning Officer, with a report of the concerned Police/Income Tax authority, before sharing with media. |
| | 17.4 Unattended media reports convey an impression of laxity. | From three months before the likely announcement of election-schedules, all relevant matters reported in media need to be tracked for necessary action. |
| | 17.5 Possibility of motivated reporting or sponsored news items. | All mass media reporting to be monitored for any possible cases of paid or distorted news. |
| 18. Continuous Updating of Electoral Rolls | 18.1 BLOs not being in place. | Meticulous updated of BLO contact details. |
| | 18.2 Bulk submission of registration forms by BLAs. | System to restrict bulk feeding of Form-6. |
| | 18.3 Approval of Form-6 without due checking. | Abnormal additions part-wise to be scrutinized. |

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| 18.4 Acceptance of Form-6 even after duplicate warning by system. | Accepting Form-6 when the system has flagged the possibility of repeat entries to be allowed only after reference to a supervisory level. |
| 18.5 Unauthorised approvals at the subordinate levels. | Frequent changes of passwords or biometric identification system should be kept in place. |
| 18.6 Delay in deciding i-forms cause submission of repeated forms. | Time-bound disposal of i-forms to be insisted. Daily review of pendency of forms. |
| 18.7 Inadvertent deletion of important electors such as renowned art personalities, political representatives, senior public servants, judicial officers, etc. | A list of such important elections to be maintained part-wise in every assembly constituency. |
| 18.8 Motivated deletions, or excessive delay resulting in non-approval, in respect of targeted populations. | All abnormal deletions part-wise must be scrutinized. Delay beyond permitted time must be got reported by the system automatically to the higher level. |
| 18.9 Acknowledgement of Form-6 not given to applicants, thereby preventing tracking of pending applications. | Generation of specific acknowledgement numbers to be made compulsory, by which processing of forms can be tracked by the applicants. |
| 18.10 Wrong modifications by electors of other electors' details. | Any modification in internet mode to be made password-protected so that no one is able to modify other electors' details. |
| 18.11 Delay and confusion in delivery of EPIC. | Part-wise segregation of EPICs should be made after approval of registration. Under no circumstances should EPICs be got distributed by political representatives. |
| 18.12 Not maintaining print copies of registration forms. | Numbered forms to be maintained, and action must be first completed on the printed form, before approving or rejecting on the ERMS. Scanned copies of Forms and relevant documents may be kept in data archives. Printed forms on which action has been taken must be preserved for the prescribed duration, with proper cross-referencing. |

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| | 18.13 Missing certain segments like marginalised persons, women, youth, disadvantaged and poor people, tribals in remote areas, transgenders, ex-servicemen, etc. | Meticulous updated of BLO contact details. |
| | 18.14 Involvement of NGOs/youth associations with political inclination for voter registration. | System to restrict bulk feeding of Form-6. |
| | 18.15 Existence of repeated entries, dead or shifted electors, and errors in electoral rolls. | Abnormal additions part-wise to be scrutinized. |
| | 18.16 Choking of the system on account of pushing of thousands of applications in the last few hours. | Accepting Form-6 when the system has flagged the possibility of repeat entries to be allowed only after reference to a supervisory level. |
| | 18.17 Incomplete coverage of PER and EPIC in certain parts. | Frequent changes of passwords or biometric identification system should be kept in place. |
| Work Area | Risk Identified | Mitigation Measures/ Action (Points) |
| 19. Security of Electoral Roll Database | 19.1 Huge data of citizens in an easily downloadable format compromises on data security as well as privacy. | Robust system-controls should be put in place so as to secure electoral roll data from unauthorized use by various interest groups. |
| | 19.2 Machine-driven programmes can download entire database to do unauthorized data-analysis for motivated misuse or mischief. | View-alone formatting can be done, disallowing free downloads, and completely disabling running of programmes on downloaded database. Only a few downloads should be allowed from one IP address. |
| | 19.3 Free soft copies to political parties subject to data-processing and categorizing electors for political gains. | Only print copies may be given to political parties; soft copies of electoral rolls should be 'view only' type. |

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| <p>19.4 Unfettered search facility may lead to mischief in respect of other electors.</p> | <p>Proper controls (like CAPTCHA) to be put on every PDF containing one part, so that only humans can do search. Search queries should be allowed after password-based verification of the elector. Mail-based search option can be given. Searching multiple random names from one IP can be disallowed.</p> |
| <p>19.5 Sharing of electoral data with other agencies such as SEC or government departments may allow unauthorized copying or transfer of data.</p> | <p>While electoral rolls can be shared with SEC or other government departments, raw electoral data must not be shared with outside agencies. Optional information like e-mail ID, mobile phone numbers, Aadhaar numbers, etc. must never be displayed or shared with any other agency. Even while sharing electoral roll information with State Election Commission or other government departments, specific conditions should be put so as to disallow misuse of electoral data.</p> |
| <p>19.6 Misuse of electoral data for private or commercial purposes.</p> | <p>Misuse of electoral data without authentication from the competent authority should be made an electoral offence. A warning should be displayed on ECI/CEO websites that use of electoral roll data for any non-election activity is strictly prohibited. Standard Cyber security measures need to be in place. For any academic or other research/information dissemination purposes obtaining permission should be made mandatory.</p> |
| <p>19.7 Outsourced programmers and operators or printing vendors may compromise data security.</p> | <p>SLA personnel and other outsourced operators must be bound by proper agreements to protect electoral data from any unauthorized use. Vendors should be given numbered soft copies, which must be got back, before settling their bills.</p> |
| <p>19.8 Excessive dependence on SLA may create a situation of monopolistic control on electoral roll management system, giving scope for complacency, sloth, or even a tendency to dictate terms.</p> | <p>A senior officer (Deputy/Joint CEO) with IT background, accompanied by at least one senior programmer working in CEO's office (on deputation from State Govt./NIC) must monitor SLA's activities on a regular. Besides, SLA's performance should be got evaluated by a third party agency every year. Agreements with SLAs should always give specific control points in the hands</p> |

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| | | of the CEO. Senior operators from SLAs should not be allowed to leave abruptly, without giving a proper orientation to the successor, along with a transparent hand-over of data control keys under the supervision of the Deputy/Joint CEO (Technical). |
| | 19.9 Inadequate Disaster Recovery Systems. | A detailed security audit of both software and hardware must be done at least 6 months before the likely announcement of general elections. ECI guidelines must be followed in respect of electoral data security, cyber-control, adequate capacity of back-up systems, etc. Annual Maintenance Contracts must be got renewed for servers and other important hardware. Physical inspection of the data storage centre should be done for checking about general security and fire safety. |
| | 19.10 Excessive stress on technical manpower may lead to errors and breakdown. | Regular review of pendency, timely disposal of forms, and advanced supply of necessary hardware will ensure that there is no undue stress on the technical team working on electoral roll management systems. Senior administrative officers must insulate the technical personnel from extraneous pressures. A conducive work-environment, including safe transport measures for those working late, proper scheduling of shifts, etc. can prevent any breakdown. |
| Work Area | Risk Identified | Mitigation Measures/ Action (Points) |
| 20. Poll Processes: Nomination, Scrutiny, withdrawal and Symbol Allotment | 20.1 Incorrect notification about designation of RO may lead to legal complications. | It must be doubly checked that the designation of the Returning Officer in all notifications and notices is the same as notified by the Election Commission in the State Gazette. It may be desirable to have a new office seal made if so required. |
| | 20.2 Hasty receipt of nomination papers and documents may lead to avoidable rejections later. | Every single nomination and accompanying documents should be checked at the time of submission, and deficiencies if noticed should be communicated to the candidate/proposer in writing, mentioning specific time and date before which the said defect must be got |

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| | rectified to the satisfaction of the RO. |
| 20.3 Last hour rush on last date of nomination may lead to complaints about difficulty in access. | Adequate security should be ensured in the entire campus of the office of the Returning Officer to control people and allow smooth entry of candidates/proposers. |
| 20.4 Frivolous complaints about non-receipt of forms, though claiming to be within time. | The watch for public view in RO's office should be got checked on the last day in particular. Videography should be done of the proceedings in the last half an hour, with photos of the people and officers including ECI Observer present at the time of the closure, with a clear view of the watch. |
| 20.5 Undue request to permit submission of documents beyond the hour prescribed. | The RO must scrupulously follow the statutory rules and ECI guidelines about the time-limits for submitting forms and supporting papers. |
| 20.6 Lack of pre-check may lead to delay at the time of scrutiny. | Following a prescribed check-list, all nomination forms and accompanying documents like Affidavit, electoral roll extract, caste certificate where needed, security deposit receipt, etc. must be checked after the nomination time closes. |
| 20.7 Apparent consultation at scrutiny time may lead to avoidable complaints. | Each and every case of doubt must be got clarified through Legal Division of the Election Commission much before the start of scrutiny. Under no circumstances should the RO be in telephonic consultation during the scrutiny. |
| 20.8 Not giving reasonable opportunity may lead to avoidable election petitions. | Even when the RO is very clear that there is no need to give time for resolving a particular objection or deficiency, it is prudent to give some reasonable opportunity, if specifically requested by a candidate / agent. |
| 20.9 Perceived non-application of mind can not only lead to election petition but also be a ground for doubting the validity of election. | The Returning Officer may consult the Legal Division of the Election Commission, or the office of the Chief Electoral Officer or the Observer present on the occasion, but he/she must apply his/her own mind on the |

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| | <p>facts and circumstances of the matter in question and arrive at a reasoned conclusion, with a speaking order, without any mention of such extraneous consultations. The RO has to be guided by his/her own judgement, based on the position of law and applicable rulings, without any apparent influence of outside opinion.</p> |
| <p>20.10 Wrongful rejection of a nomination can become a valid ground for setting aside the whole election.</p> | <p>After doing adequate scrutiny and analysis, in case of any doubt, the guiding principle should be to give the benefit of doubt to the candidate, as wrongful acceptance does not vitiate an election but wrongful rejection can certainly become a ground for challenging the election.</p> |
| <p>20.11 Old copies of symbol books may lead to mistakes in allotment.</p> | <p>Only the latest document issued by the Election Commission for the specific election should be consulted, while deciding about the list of symbols and their particular print types. In case of doubt, the office of CEO or ECI Division concerned must be consulted.</p> |
| <p>20.12 Unauthorised or wrong Form A&B, specially from unrecognized political parties may lead to complaints and litigation.</p> | <p>At the time of receiving nominations, every Form A and B should be checked with respect to the office address given in the list of registered political parties. In a book form, this list is issued before every general election by the Commission.</p> |
| <p>20.13 Frivolous complaints of not getting a symbol of one's choice may lead to litigation by non-serious candidates.</p> | <p>If it so happens that all the symbols requested by the candidate are either reserved or not from the list of approved free symbols, the candidate should be asked to give in writing about his consent for a particular symbol. In case of a lot, proceedings should be video-recorded.</p> |
| <p>20.14 Non-standard photograph may delay printing of ballot papers.</p> | <p>Even at the time of symbol allotment, any non-standard photographs, if already detected, should be got correctly replaced by the candidate. To avoid complaints later, the photo to be used in ballot paper should be obtained in writing by the candidate.</p> |

| Work Area | Risk Identified | Mitigation Measures/ Action (Points) |
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| 21. Printing and security of Ballot Papers | 21.1 Defective printing with mis-spelt names, blurred photograph, incorrect sequence, etc may lead to complaints and even be a ground for election petition. | The list of Contesting Candidates (Form 7-A) must be personally scrutinized by the Returning Officer and cross-checked with the particulars given in the nomination form. The election staff of RO's office should personally see the draft ballot paper. The office of the CEO must then scrutinize the draft ballot paper with respect to the approved list of contesting candidates. Size, colour, format, spacing, clarity of photo, proper sequence, serial numbers, clarity of printed symbols with reference to the print available in the approved symbol-list, and check the quality and colour of the ballot paper, before it is cleared for printing. |
| | 21.2 Unaccounted ballot papers may be subject to mischief. | All cancelled or defective ballot papers should be got destroyed under proper supervision. All final ballot papers should be got counted physically by election-staff from RO office and dispatched with proper security. |
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| Work Area | Risk Identified | Mitigation Measures/ Action (Points) |
| 22. Vulnerability mapping and security plan | 22.1 'Law and order' based inputs may not be sufficient to secure a clean poll. | Excessive emphasis should not be given to poll-related past incidents, because present players and circumstances may have changed the poll-scene that existed 5 years ago. Intelligent analysis of voting statistics, electoral registration, public grievance, present-day rivalry, etc. must be considered along with 'law and order' inputs. |
| | 22.2 Leaving police to decide the degree of sensitivity may lead to gaps in election-management for a clean poll. | While inputs must be obtained from the police authorities, vulnerability mapping should be decided by the DEO and the ROs who are actually responsible for a free and fair election. |

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| <p>22.3 Delayed proceedings in preventive cases do not result in binding over of the potential trouble-makers.</p> | <p>About six months before the probable announcement of election-schedule, all pending police cases in respect of preventive proceedings should be reviewed by the DEO and SP together. Potential trouble-makers should be proceeded against in a time-bound manner, so that around the time of campaigning, all such anti-social elements are bound over, extradited or kept in preventive custody.</p> |
| <p>22.4 Unrealistic demand for CAPF conveys dependence on central forces for ensuring orderly polls.</p> | <p>Assessment of extra forces should be based on situation-analysis after completing vulnerability mapping. Requirements from different districts should not be aggregated mechanically. State-level sensitivities such as border areas, political significance of constituencies, should act as moderating points.</p> |
| <p>22.5 Routine emphasis on CAPF may result in underutilization of state's resources such as Home Guards, NCC, Civil Defence.</p> | <p>Non-sensitive polling stations may be supervised by home guards and civil defence personnel, while with due permission of the authorities, NCC cadets can be utilized for maintaining queues and providing booth-level assistance to the females senior citizens and physically challenged electors.</p> |
| <p>22.6 Underutilization of non-force measures such as videography, web-casting may results in spreading the security forces too wide for effective supervision of actually sensitive locations.</p> | <p>Videography of voters in queue and people gathered outside, real-time web-casting of poll in process, micro observers supervising the voting procedures, all such non-force measures allow the security forces time and resources to concentrate on actually difficult and sensitive areas.</p> |

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| | <p>22.7 Constituency-wise and District-wise deployment if left to police authorities may get influenced by political factors.</p> | <p>After the ECI allots and Home Ministry, Govt. of India issues deployment orders, the actual allocation of the CAPF companies district-wise and/or constituency-wise should be done by the CEO in consultation with the DEOs. Inputs from State's Home Department should be scrutinized properly. Instead of completely depending on State Intelligence inputs, the CEO should directly speak to the field officers such as DMs and SPs for a correct assessment of requirement of CAPF companies. It must always be kept in mind that conducting free and fair elections are the mandate of the Election Commission; and therefore, the optimal utilization of security forces should be ensured by the election management authorities, after a proper scrutiny of intelligence inputs with respect to the realities on the ground.</p> |
| <p>23. Personnel Management</p> | <p>23.1 Not finding adequate numbers of polling personnel, particularly female polling staff.</p> | <p>The exercise to identify polling personnel should begin at least 3 months before the probable date of announcement of elections. Database of employees with State Government/Central Government/State & Central PSUs should be taken and grouping should be done on the basis of seniority for poll-deployment. A safe margin of about 20% should be kept ready. List of female employees with their residence address should be prepared so that they are not deployed to distant polling stations.</p> |

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| <p>23.2 Deployment of such staff as are not fit for strenuous jobs.</p> | <p>A chronic diabetic or a person suffering from high blood pressure may be performing his/her routine office duties with perfection, but may not be suitable for poll-duty which is full of physical and mental stress. Unforeseen events, possible law and order situations and threat of violence can add to the usual stress of tiring travel and discomforts of stay at an unknown place. It is therefore prudent to consider genuine medical conditions before issuing deployment order, or exempt serious or chronic cases when identified during poll-training, rather than exposing the suffering employee to further hazards and weakening the poll-duty teams in the process. Similarly, young mothers or women with medical conditions should be exempted. Employees with disability should be posted to encourage differently-abled voters, but should not be sent to very inconvenient locations.</p> |
| <p>23.3 Deployment of exempted categories may lead to litigation later.</p> | <p>The Election Commission has exempted certain categories of employees from poll duty. Strict adherence to those instructions must be ensured. During training sessions, it should be cross-checked that exempted categories have not been put on poll duty.</p> |
| <p>23.4 Inadequate training may lead to inefficiency, errors and possible vitiation of poll-process.</p> | <p>Training of Presiding Officers and Polling Officers must be done in a meticulous manner in a class-room atmosphere. Batches should be small so that the training is more interactive. Doubt clearing sessions should be held. Practical demonstration and proper handling of EVMs should be facilitated. Conduct of mock poll and clearing mock poll data must be instructed. PROs must be told to inform the supervisory officers in case of any serious difficulty or unexpected happening.</p> |

| Work Area | Risk Identified | Mitigation Measures/ Action (Points) |
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| 24. Level – Playing field in campaign period | 24.1 Distribution of cash and goods vitiates the level-playing field and raises doubts about the efficiency of the election management authorities. | Adequate number of check posts, both static and mobile, flying squads, video-recording teams should work together with intelligence agencies for effective control on supply, storage and distribution of inducements. |
| | 24.2 Delayed response to complaints affects the morale of law-abiding citizens. | Timings of receiving complaint and reaching the spot should both be mentioned. Daily analysis of response-time should be done so as to either increase the number of squads, or to rationalize their routes. There should be a system of informing the complainant, if he has given his contact details, about the action taken. |
| | 24.3 Enforcement agencies working without coordination. | Immediately after the announcement of election-schedule, the CEO should hold a coordination meeting with state-level authorities of Police, Income Tax, State Excise, Central Excise, Commercial Tax and Narcotics Control Bureau for effective sharing of intelligence so that timely action may be taken to prevent the flow of money, liquor, gifts and other items. Central Government agencies should be ensured protective support of local police authorities in their efforts of search, seizure and raids. A separate meeting with DGCA authorities should be done so as to maintain fool-proof vigilance on suspected traffic through air. |
| | 24.4 Inadequate coordination with neighbouring states may allow inter-state movement of illegal cash, liquor or goods. | A meeting just after the announcement of election schedule and another when the campaign-period starts should be held with neighbouring states to have effective coordination on state borders. A spirit of reciprocating pro-activeness can induce the neighbouring state authorities to work for a common purpose. |

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| | 24.5 Ignoring coastal security can be a cause of concern. | A separate meeting with Coast Guard and State Police should be organized. State Department of Ports and Fisheries should also be involved to monitor suspicious movements through or near small ports along the coast. Suspected landing points for contraband goods should be kept under surveillance. |
| | 24.6 International land borders can be a source of infiltration for disrupting poll-process. | While Border Security Forces guard international borders, the DEOs of districts having international borders should hold one-to-one coordination meeting with concerned commanding officers. |
| | 24.7 Undeposited firearms can be a source of trouble. | ECI instructions on deposit of licensed arms must be followed quickly. |
| | 24.8 Illegal firearms can cause violence to intimidate voters. | Search and seizure operations for illegal firearms must be continued throughout the election period. Police cases should be booked and quick investigation should be done to build confidence among law-abiding citizens. |
| Work Area | Risk Identified | Mitigation Measures/ Action (Points) |
| 25. Conducting free, fair and peaceful polls | 25.1 Check-posts get abandoned on the eve of poll, allowing unrestricted movement of prohibited items. | As far as feasible, some CAPF units should be continued to man check posts on the night prior to poll. If logistically manageable, security personnel guarding overnight may be allowed to rest the next day and report before closure of poll so as to relieve the poll-duty personnel. |
| | 25.2 Election machinery's focus being on Polling Stations, the vulnerable areas do not get adequate protection during the day and night prior to poll. | A basic minimum enforcement of vulnerable areas, border points and crucial check-posts should be continued, as the last 24 hours are the most vital for the purpose of minimizing illegal influences on electors. |
| | 25.3 Last night contacts by party functionaries allows scope for extraneous influences. | All contesting candidates and their agents should be video-trailed in their last day campaign. Prohibitory orders may be imposed by Magistrates in areas – where possibility of mob-violence or threatening the weaker sections exists. |

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| <p>25.4 Unattended serious complains may raise doubts over integrity of poll-process.</p> | <p>If serious allegations have been made about personnel, machines, or violations of code of conduct, all such grave matters must be examined, resolved, and communicated to the complainant as well as general public so as to maintain trust in the system's efficiency and integrity.</p> |
| <p>25.5 Inadequate protection of EVMs and poll-material in case PRO does not stay overnight.</p> | <p>By way of GPS monitoring, stay of PRO and other essential staff should be ensured on the night before poll-day.</p> |
| <p>25.6 Non-functioning electrical connection, water supply, etc. at polling stations.</p> | <p>Assured Minimum Facilities of Polling Stations, along with connectivity status must be cross-checked on week before the poll day, so that corrective action can be taken well in time.</p> |
| <p>25.7 Non-deletion of mock-poll votes may result in all votes becoming invalid.</p> | <p>Along with mock poll conduct report, mock poll data deletion report must be collected from every polling station. It may be explored whether the machine itself can prompt to clear mock poll data before actual poll-setting is done.</p> |
| <p>25.8 Agents of less powerful candidates may either be absent or discouraged from continuing.</p> | <p>Presence of only one agent should be taken as a sign of imbalance of political power. Very careful videography should be done at such polling stations. ASD lists should be scrutinized meticulously for possible duplicate voters/impersonators. Hourly voting figures should be assessed more carefully at such stations.</p> |
| <p>25.9 Malfunctioning of EVMs during the poll.</p> | <p>Spare EVMs to be kept with mobile supervisory units, along with technical experts for quick replacement of EVMs.</p> |
| <p>25.10 Overwhelming numbers in late hours of poll may disrupt poll process through booth-jamming.</p> | <p>Hourly reports to be assessed. In Polling Stations with abnormally low voting figures in the first half, special attention should be given. If the number of electors waiting at the end of poll is large (over one hundred), additional officials and security should be rushed to control the situation.</p> |

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| | 25.11 Booth-capturing with apparent force. | Last hours of polls should be monitored continuously. PROs should be trained to report any incident of violence immediately. In case there is a threat to the life of poll personnel, the event of booth-capturing must be reported to the Returning Officer after the safe return to headquarters. |
| | 25.12 Silent rigging. | Abnormally high polling in last one hour must be investigated. Mock-poll data, presence or absence of polling agents, hourly poll figures, PRO diary, etc. must be properly examined. Any complaint about rigging should be urgently looked into and the EVM should be kept aside in strong room. |

Counting

| Work Area | Risk Identified | Mitigation Measures/ Action (Points) |
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| 26. Counting Hall | 26.1 Failing to notify the details of counting time and place as per Rule's of conduct of Election Rule's 1961 | As law prescribes minimum one week before the date, or the first of the dates, fixed for the poll the notice by the RO, mandatory monitoring on the dashboard is needed. |
| | 26.2 Failure in timely submission of proposal of counting hall for the ECI in the prescribed format. | At least 15 days before the poll, the proposal must reach to the ECI. |
| | 26.3 No inspection of the counting hall. | Mandatory inspection by the RO, much before the due dates. |
| 27. Security of Counting Hall | 27.1 Failure to have joint inspection by the DM and the SP. | At least 21 days before the counting, the inspection must be carried out from security perspective. |
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| 28. Strong Room | 28.1 Failure in joint inspection as per ECI's instructions. | Daily report on the dashboard to be generated. |
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| 29. Counting Personnel | 29.1 Limited focus on Counting Personnel requirements | Adequate preparation for the database and updation. |
| | 29.2 Limited availability of Micro Counting Observers | Advance preparation to be made |

| Work Area | Risk Identified | Mitigation Measures/ Action (Points) |
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| | 29.3 Poor Training of Counting Personnel | Scheduled training with focus on hands on session well in advance |
| 30. Counting Hall Management | 30.1 Lack of awareness amongst the candidates, and other stakeholders about entry restrictions | Written as well as one-to-one communication by the DEO/RO. |
| | 30.2 Lack of Communication with security agencies on entry restrictions. | Advance meeting with the SP. |
| | 30.3 No attention to detail on seating arrangement, electricity, tele-connectivity | Observer and DEO to ensure this. |
| | 30.4 Media communication Gap | Adequate arrangement for dissemination. |
| 31. Postal Ballot Counting | 31.1 Absence of focus on PB | RO and Observer must keep a close watch. |
| | 31.2 Inequal and wrongful rejection | All rejected PB must be checked by the RO |
| 32. Result Declaration | 32.1 Anxiety in close contest | RO and observer must take all precautions, as listed by the ECI, before announcing such results |
| 33. Election Petition | 33.1 Non- Communication of filed EPs | CEO must establish contact with the Registry of High Court and monitor. |
| | 33.2 Lack of clarity on EVM Petition | CEO to periodically monitor the petitions where any direction to keep the EVMs are issued. |