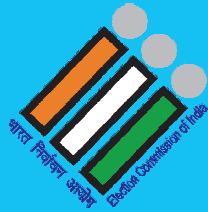




Manual on Electoral Risk Management

April, 2017

Document 16 Edition 1



भारत निर्वाचन आयोग
Election Commission of India

Nirvachan Sadan, Ashoka Road, New Delhi-110001

"No Voter to be left behind"

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भारत निर्वाचन आयोग
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डा० नसीम जैदी

भारत के मुख्य निर्वाचन आयुक्त

DR. NASIM ZAIDI

Chief Election Commissioner of India



भारत निर्वाचन आयोग
Election Commission of India



FOREWORD

Conduct of Indian elections is a humongous task. Its success has been made possible with the laying down of a systematic web of electoral processes in a clear and unambiguous manner and being followed by all stakeholders. This helps in successfully responding to any risk present or probable in the electoral environment.

Since the first election in 1951-52, the Election Commission of India has been facing the risks in the electoral processes and providing detailed guidelines and instructions to mitigate those risks to make the electoral system free, fair and transparent. Later, the Commission provided checklists for each level of functionaries and for each aspect of electoral activities to make the system robust. With advancement in our understanding of risk management, it seems appropriate to revisit our approaches to risk reduction with more clarity. Accordingly, this Manual uses complete electoral cycle as a base to enlist the present and probable risks and prescribes the interventions needed to address those risks. There will be need for regular updation of this Manual as each new election throws new risks which require to be addressed.

I compliment Chairman & members of the Working Group and Convenor (Director EDMD) who worked hard in formulating the Risk Management Manual for the first time in comprehensive manner.

I urge each and every election functionary to go through this Manual and streamline the interventions in electoral process so that electoral system becomes more equipped to face future challenges of complex electoral environment.

Nasim Zaidi
(Dr. Nasim Zaidi)

ए. के. जोति
भारत निर्वाचन आयुक्त
A.K. JOTI
Election Commissioner of India



MESSAGE

All precautions have been taken by the Election Commission of India since 1950 to make Elections Free and Fair and the Commission's instructions on all envisaged Risks are available for use of the Field Functionary. This Manual consolidates all the Main points of Election management at one place, I congratulate the Team for their effort. I am sure the Manual will sensitise the Election Machinery on the areas where efforts can go wrong and where additional care would be Required and would definitely help in increasing the efficiency of Election Machinery in Future.


(A.K. Joti)

निर्वाचन सदन, अशोक रोड़, नई दिल्ली- 110 001
Nirvachan Sadan, Ashoka Road, New Delhi 110 001 दूरभाष / Tel: 011-23052132, 23052134 फॅक्स / Fax: 011-23052249
ई-मेल / E-mail akjoti@eci.gov.in, वेबसाइट / Website: www.eci.nic.in

ओ. पी. रावत

भारत के निर्वाचन आयुक्त

O. P. RAWAT

Election Commissioner of India



सत्यमेव जयते



भारत निर्वाचन आयोग
Election Commission of India



MESSAGE

Over the period of time, areas of election management have widened and an officer at district level needs to engage in multiple activities involving multiple players with varied objectives while conducting elections. To effectively manage such a complex environment, Commission has acknowledged the importance of risk management in conduct of elections. With a view to prevent/mitigating such risks in the field, the Election Commission of India have compiled such risks and suggested approaches to be followed in a complete electoral cycle. The national and international trends in risk management detailed in this Manual will also give a right perceptiveness to the field machinery to face electoral challenges. Continuously, updating this Risk Management Manual can only be achieved by prompt feedback from field machinery on evolving situations/risks and related strategies which could be effective in dealing with them, on one hand and Commission's support and quick response in all such cases, on the other. I hope and wish that all stakeholders will make use of this Manual effectively as well as contribute to keep it up to date for future challenges.

(O.P. Rawat)

निर्वाचन सदन, अशोक रोड, नई दिल्ली-110 001
Nirvachan Sadan, Ashoka Road, New Delhi-110001

दूरभाष/Tel.: 011-23052137, 011-23052138, फैक्स/Fax: 011-23052139, वेबसाइट /Website: www.eci.nic.in

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Abbreviations

AERO	:	Assistant Electoral Registration Officer
ARO	:	Assistant Returning Officer
BLO	:	Booth Level Officer
BLA	:	Booth Level Agent
CEO	:	Chief Electoral Officer
DCP	:	Deputy Commissioner of Police
DEO	:	District Election Officer
DM	:	District Magistrate
ECI	:	Election Commission of India
ER	:	Electoral Roll
ERO	:	Electoral Registration Officer
EVM	:	Electronic Voting Machine
IIIDEM	:	India International Institute of Democracy and Electoral Management
KABBP	:	Knowledge, Attitude, Behaviour, Belief and Practices
PO	:	Presiding Officer
RO	:	Returning Officer
SLA	:	State Level Agency
SP	:	Superintendent of Police
UT	:	Union Territory
VVPAT	:	Voter Verifiable Paper Audit Trail



EXECUTIVE SUMMARY

In the process of organizing and conducting 16 General Elections, 349 General Assembly Elections, 14 President & Vice President Elections besides Council Elections and bye-elections, the Election Commission of India has created a benchmark in electoral management which is appreciated the world over. Starting with 1951-52, the Commission has successfully delineated each and every aspect of the electoral process in simple but comprehensive manner, which has allowed the electoral machinery to anticipate various types of risks effectively and efficiently. However, increased complexity of environment of conducting elections requires a relook at the strategies to manage the electoral risks.

Hazard, vulnerability and risk are some common terms, which are used in risk management. However, all three entail different meanings. Hazard is a potential threat, vulnerability is susceptibility and exposure to loss, and risk is effect of uncertainty on objectives. Risks are integral to any process. Depending on the planning, preparation and resources, risks and hazards are addressed in reactive, proactive and predictive ways. An effective and efficient strategy to manage the risks involves anticipation of risks, identification and interpretation of risks, creation of evidence based risk reduction approaches, enhancement of resilience of the system and updating the capabilities of electoral machinery and development of Standard Operating Procedure(SOP) for each and every identified (and anticipated) risk. The Election Commission of India has developed a number of tools such as Vulnerability Mapping, Check Lists, Critical Polling Stations, Assured Minimum Facilities, District Election Management Programme, Force Deployment Plan, to name a few, to identify and intervene risk in each and every aspect of electoral process. The electoral machinery has adopted these tools in the electoral processes effectively. These tools have evolved with the experiences gained in every new election. Now there is a felt need to consolidate all such tools at one platform. In any complex environment like electoral management, it is prudent to put all risk situations at one location to facilitate the election functionaries in better interventions.

Accordingly, the Commission constituted a Working Group (Annexure I) to prepare a consolidated risk manual of electoral management. After detailed deliberations and examinations of existing best practices in the world in

electoral risk management¹, the Group has prepared this risk manual, which not only consolidates all previous instructions and guidelines but also provides a composite manual from start to finish in an electoral cycle. The manual also consists of a separate chapter for risks in the elections to the Council of State and the Legislative Councils.

While designing the risk management strategy at the field level, it seems appropriate to lay down a comprehensive sequential (chronological) platform for coherence and sanctity in communication, clarity, simplicity, scaling, effective and efficient delivery and repository for consistent application. Wherever necessary, this platform will have digital layers to assist the electoral machinery in responding to specific risk scenario. However, the basic ingredients of risk management – identification, assessment, implications, prioritization, intervention, and evaluation – form the core of the manual.

It would be naive to presume that each and every uncertainty finds place in any risk strategy. However, a robust resilient system demonstrates enough tenacity and redundancy to deal with any eventuality. Keeping this in view, this manual will certainly aid our electoral professionals in anticipating and responding any electoral risk that may have any potentiality to threaten the security of the process at any level.

Altogether 37 aspects of electoral management are covered in this manual (Illustration 1). In each aspect, the risks, common and probable, are listed. Identification of these risks is reflection of cumulative wisdom of our electoral legacy spanning across close to seven decades and in diverse territories. Needless to mention that certain States/UTs may encounter additional list of risks owing to local conditions and knowledge. The Commission would like to encourage the CEO concerned to update the list accordingly periodically and inform the Commission regularly. Altogether 191 risks are listed amongst these aspects of electoral management.

¹Globally, Institute for Democracy and Electoral Assistance (IDEA) has popularized risk management tool for elections, however its focus remains on conflict riddled or fragile States. Similarly, ISO 31000 pertaining to risk management was also examined.

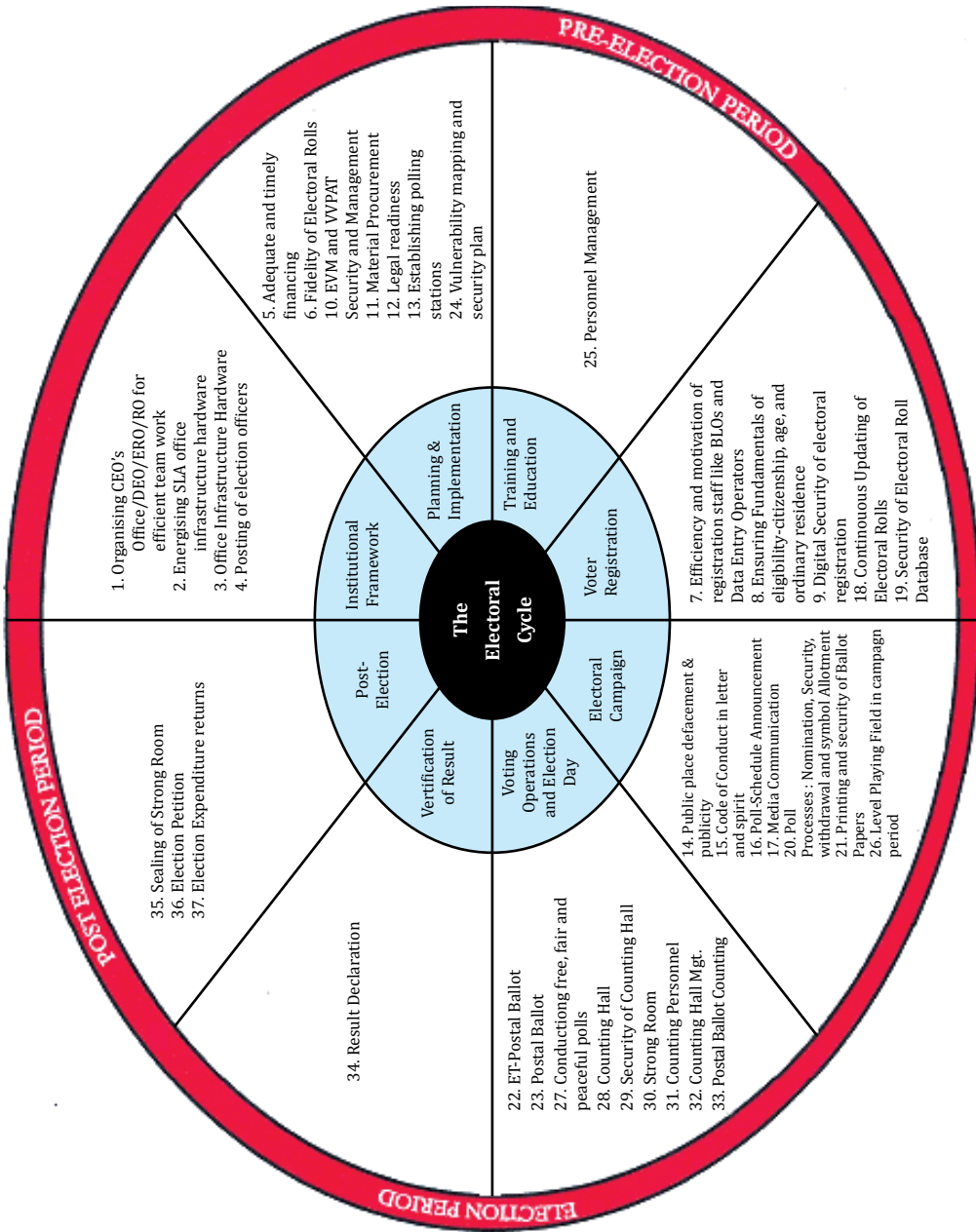


Illustration 1: Electoral Cycle

Some of these risks concern the statutory provisions of electoral management such as: flaws in nomination process, non-application of mind in scrutiny, wrongful rejection of nomination paper, error in ballot paper printing including photo mismatch, non-deletion of mock poll results etc. Any neglect of such risk may prove fatal to the electoral process itself. Careful training and continuous oversight, as mandated by the Commission, are helpful in addressing such risks. In this manual, such risks have been highlighted to draw the attention of the election functionaries. Since the risk list prepared by the Working Group has been circulated to all CEOs in December 2016, the new additions to the list have been given in coloured font.

The Working Group recommends to evaluate and prioritise risks and to design appropriate mitigation strategies at the level of States/UTs. For effectiveness of risk management, it is also recommended to make robust risk evaluation criteria based on data/information and indicators. Use of IT platform to document experience, on case studies, best practices, latest data and to evaluate risks is also recommended.

CHAPTER 1

INTRODUCTION

Risk assessment is carried out in order to predict possible problems and to identify their likely sources with the primary objective of preventing such problems from arising in the first place. Risks need to be identified, analyzed, quantified and prioritized- ACE Encyclopaedia²

The world is increasingly adopting democracy as a political order. Only a fair and transparent election process can maintain democracy. Increased consciousness of Election Management Bodies and Electoral Assistance Agencies prompted them to adopt measures to deliver elections better. Measures to improve fairness and transparency have changed with advancement in Information and Communication Technology. Electoral procedures aided by technologies are more effective with re-enforced, systematic, authentic and with timely actions. With this perspective, responsibility of Election Management Bodies in setting up credible electoral processes to make processes transparent and to prevent, reduce and to mitigate risks is supreme.

For more than sixty years, Election Commission of India has been conducting free, fair and secure elections. All political parties and election watchers accept the results and the election managers take pride in each successful completion of elections. During a nation-wide general election, more than 10 million officials are deputed to assume specific roles to undertake various activities of the conduct of elections. The fact that huge number of officials are involved in elections and that the whole exercise needs to be completed in a time-bound manner make it necessary for the Commission to implement measures to reduce risks in election management. The Commission has always endeavoured to bring in improvements in election management so that credibility of elections is maintained. Within the legal framework set by the

²Created in 1998 as the ACE (Administration and Cost of Elections) Project by International IDEA, IFES (International Foundation for Electoral Systems) and UNDESA (United Nations Department of Economic and Social Affairs), it focused solely on election administration with the aim to create an encyclopedia on how to administer electoral processes. In 2006 it became more interactive, and to reflect the new identity of the project, the name was changed to the ACE Electoral Knowledge Network (with the letters ACE no longer standing for Administration and Cost of Elections).

Constitution of India and laws/acts of Parliament, the quality of elections has improved considerably over years due to many procedural changes initiated by the Commission like Electors' Photo Identity Cards, Electronic Voting Machines, Voter Verifiable Paper Audit Trails, deployment of personnel through randomisation, vulnerability mapping, deployment of Central Armed Forces, Voter Awareness Programmes etc. These measures instil transparency and create a level playing field and promote uninfluenced and ethical participation and contribute in reducing risks in the conduct of elections.

To place the above in risk management perspective, ECI has been issuing instructions/ guidelines to deal with electoral risks for more than six decades. Procedures have also been laid down to tackle risks. However, in spite of well laid down procedures, all field functionaries are required to deal with some contingent risks at the time of elections, since no strategy is fool proof and the envisaged and the documented procedures may not deliver hundred per cent. In this context, the Election Commission of India set up this Working Group to prepare a concise Electoral Risk Management Manual. The order related to constitution of the Working Group is given as **Annexure 1**. The Terms of Reference as decided include the following aspects:

1. Developing evidence-based risk reduction strategies, in all the aspects of electoral management; by extensive planning, use of technology, and building the capacity of election officials.
2. Enhancing the coping capacity and the resilience of electoral management system to reduce risks.
3. Periodic and systematic Monitoring of implementation of Risk Reduction Strategies.
4. Evaluation of implementation of Risk Reduction Strategies for further strengthening for future application.

The Working Group had a number of interactions to explore the concept of risk management, to appreciate the countries' experiences in electoral risk management, to compile the identified risks in elections in India, and to prescribe a pathway to intervene those risks for more efficient and effective electoral processes.

CHAPTER 2

RISKS AND ELECTIONS

Risk is involved in all activities of election management covering the entire electoral cycle. Risk management is developing a clear understanding of the risks that are important to the electoral process and managing them depending on the changes in the situation over time so that remedial measures remain effective.

Risk is defined as the “effect of uncertainty on objectives”

NOTE 1 An effect is a deviation from the expected — positive and/or negative.

NOTE 2 Objectives can have different aspects (such as financial, health and safety, and environmental goals) and can apply at different levels (such as strategic, organization-wide, project, product and process).

NOTE 3 Risk is often characterized by reference to potential events and consequences, or a combination of these.

NOTE 4 Risk is often expressed in terms of a combination of the consequences of an event (including changes in circumstances) and the associated likelihood of occurrence.

NOTE 5 Uncertainty is the state, even partial, of deficiency of information related to, understanding or knowledge of an event, its consequences or likelihood.

[ISO 31000:2009, Clause 2.1]

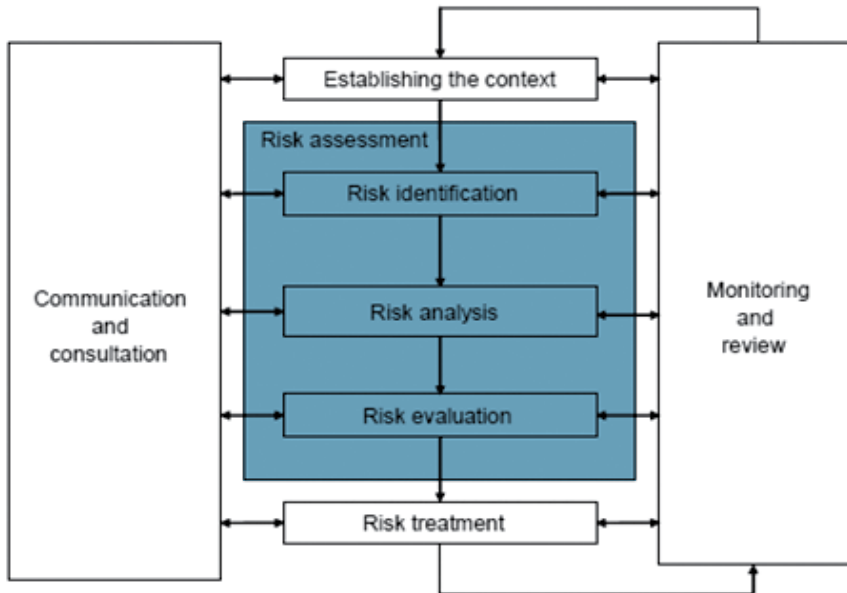
The stages involve design (of the risk management framework); implementation; monitoring and review; and continual improvement. The stages based on ISO 31000 as explained by ISO, UNIDO & ITC are as listed:

- *Developing a clear plan*
- *Implementing the plan as it was designed,*
- *Verifying that the plan is delivering the objectives that have been set (in this case the objectives for implementing risk management), and then*
- *Acting to modify the plan in response to the information developed during the monitoring and review stages on what is working well and what should be adjusted to improve the results*

It is clear that identifying, evaluating, treating and reviewing risks in cycles are the essence of risk management.

ISO 31000-2009 framework promotes to scale up the risk management from qualitative approach to more robust evidence based judgement. This needs historical and real time data as well as information. Along with such facts, selection of criteria is to be done to assess the risk. As per ISO:31010: 2009 framework, (on **Risk Assessment Techniques**), the following are standards set for objective judgement of risk:

Figure: Contribution of risk assessment to the risk management process*



* The complete flow chart shows the risk management procedure and the highlighted part shows the components of Risk Assessment.

ISO promotes robust/ evidence based risk assessment since the success of the risk management tool depends on the criteria selection (based on data and indicators) to score the likelihood and impact. For example, as per ECI procedures, polling stations are classified as sensitive/ critical based on data and evidence and by criteria selection like more than 90% votes polled to a particular candidate in a polling station in the last election.

Experiences from Countries/Organizations

Globally, risk management has now become integral to overall electoral

management. One of the international organizations, International IDEA, an Electoral Assistance Agency defines electoral risk management as a systematic effort undertaken to improve knowledge about and situational awareness of both internal and external risks to electoral processes, in order to initiate timely prevention and mitigation actions. For each country the electoral risk situation and contingency plan to mitigate risks varies depending on the prevailing social and cultural values, profile of development and available resources, maturity level of democracy etc. In this report, electoral management landscape is studied to assess the risks in operations, level of maturity of electoral processes and to recommend on the possibility of standardisation of responses to the identified risks.

IDEA has developed a tool, ERMT (Electoral Risk Management Tool), to assist the fragile democracies in overcoming conflict situations primarily. The features of the tool include:

1. risks that are measurable can be made part of this tool,
2. data collected on indicators of risks can be stored,
3. inputs on the risk perception of the election managers can be recorded,
4. results and analysis can be visualised in charts and maps,
5. best practices of mitigation strategies may be stored.

The Working Group looked into the application of ERMT in Nepal, Kenya and in some Latin American countries. Annexure 2 describes such experiences.

Learning from these experiences stresses upon the need for consistent, coherent and structured approaches to the risk situations in the electoral processes. In limited cases, wherever risks are quantifiable (measurable), the use of digital platform can be explored. At present, the Commission already has a dashboard for monitoring certain measurable electoral elements to keep a watch on certain aspects of electoral activities on ground. A bouquet of certain IT applications like Suvidha, Samadhan, Sugam and others has enhanced the transparency and effectiveness in electoral management.

CHAPTER 3

RISKS IN INDIAN ELECTIONS

Election Commission of India has a history of conducting free, fair, credible and peaceful elections. Elections are quite peaceful in India. Transfer of power after every election has been smooth. India is proud of its democratic values because of its electoral culture developed over the years. Apart from the constitutional provisions and acts of parliament that govern conduct of elections, ECI has made elaborate executive instructions and procedures for electoral fairness and transparency. Continuous improvements in the orders/instructions of the Commission are brought about at regular intervals. These instructions form part of comprehensive manuals with document controls. In the year 2015, the Commission has decided to add photographs of candidates along with names and symbols in the ballot paper so that electoral risks that can arise due to similar and confusing symbol and names can be mitigated. Similar conscious efforts for more than six decades on the part of the Commission have given India a matured electoral process.

Election Commission of India is an independent constitutional body and does not report to any other authority in matters related to the conduct of elections. The Commission has all powers to ensure that elections are conducted in free and fair manner. There are several compendiums of instructions, hand-books, manuals etc. for reference of the field machinery in the conduct of elections. Some electoral processes are managed by use of technology also. The notable example is use of EVMs. Systemic checks and balances, well laid down procedures and use of technology, reduce electoral risks in Indian elections. Stock taking of some of the milestones in the electoral process in India from the risk management perspective will be helpful to set stage for this report.

Indian electors elect their representatives to the national and provincial legislatures from respective constituencies. Law and order is to be maintained by States in normal situations and State police may be perceived by some to be sympathetic to the party in power during conduct of election. However, members of the Central Armed forces are believed to be free from local pressures to support any candidate. Given this scenario, Commission deploys Central Armed Forces to eliminate any undue influences of political parties in the process. This arrangement can be cited as an example of managing

perception about impartiality of the security forces deployed during elections.

Use of Technology along with procedural checks has reduced the risk of impersonation by electors in India. Apart from preparing voter list in parts (polling stations) of only around 1200 electors, photo identity cards are being distributed to registered electors since 1994. It helps voters to establish their identity at the polling station. Booth level agents of political parties verify and match the physical person with details of the voter in the voters list. This provides for local oversight by political parties over electoral rolls preparations. It also helps poll staff to allow the right person to vote. Unified electoral roll database is being prepared for the entire country so that multiple registration (which is not allowed by law) can be identified and the duplicate entries, if any, can be deleted as per provisions of law. The effort helps clean the electoral roll and reduce chances of impersonation.

Deployment of polling personnel for the conduct of elections is done in India using computer aided randomisation. Officials are selected out of 120% of the personnel required, based on three stages of randomisation procedures. At the first stage of selection, the officials are not informed about the constituency to which s/he will be appointed. In the second stage, constituency and the fellow team members are known. Only at the third stage of randomisation, the team knows the polling station to which it will be deputed. This procedure helps in appointing personnel with diverse backgrounds in a completely randomised manner and any bad influence on officials deputed for conduct of poll are put under control. To minimise risks that can arise due to posting of officials at district level, there are elaborate transfer policy of officers. Also central government employees are appointed as micro-observers to report on any irregularities to the Commission.

At the initiative of ECI, the Parliament amended in law in 1989 so that votes can be recorded in tamper proof electronic voting machines. Electronic Voting Machines have replaced paper ballots making the counting and declaration of results less cumbersome. To avoid malpractices in setting up of EVMs for an election, EVMs are randomly allocated to polling stations. Also, mock poll is conducted on the deployed machine in front of agents of candidates. EVMs set for election and polled EVMs are kept under video surveillance in strong rooms. To boost voter confidence, Voter Verifiable Paper Audit Trails are generated and stored. Procedures have been made to challenge EVMs and to cast test

votes on machines. Election results are transmitted to the ECI website online directly from the counting centres to disseminate error free results. Here also technology has been used in casting, counting and in disseminating results but with appropriate checks and balances.

To promote inclusive election, vulnerable areas and electors are mapped before every election. These vulnerable areas are secured with extra paramilitary forces. Confidence building measures and voter awareness campaigns are carried out in these areas. To defuse vulnerability to any group, trouble mongers are kept under preventive detention and licensed weapons are to be surrendered during the conduct of election. The Commission monitors general law and order. Wide spread monitoring of cash and liquor flows is done. Observers are deployed by the Commission to keep close watch on every stage of the electoral process and these officers directly report to the Commission. The names and contact details of these observers are publicised widely so that public can approach them with their complaints on abuse, malpractices, if any. Non-force measures such as webcasting of the proceedings at critical polling stations with history of violence or located in vulnerable areas is conducted and monitoring is done at CEO level and by the Commission itself.

To improve voter resilience and to promote ethical voting, voter awareness programmes are done at all times of the year. These programmes are designed after Knowledge, Attitude, Behaviour, Belief and Practices surveys. Voter helplines and facilitation centres and web and SMS based search facilities are provided to facilitate voters. Complaint redressal mechanisms are strengthened during election. Media monitoring to track the menace of unethical coverage of news is also done. Voter slips with photograph of the elector printed on it are distributed that can serve as an identity document and at the same time as information to the voter on details of polling stations.

Based on these experiences from our electoral legacy, a risk register has been prepared for the General Elections. This register is arranged according to electoral cycle to help the field functionaries in quicker identification and intervention. Another risk register, concerning the elections to Council of States, State Legislative Councils, and Graduate Teachers is available in the next chapter. Field functionaries are expected to take benefit of these registers to minimize any risk in the electoral processes.

Table 1 : List of risks in General Elections Pre-announcement Phase

Work Area	Risk Identified	Mitigation Measures/ Action Points	Level at which the risk is to be addressed
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	CEO
	1.2 Undesirable personnel	Those who are not dedicated enough for the public cause need to be replaced.	CEO
	1.3 Unsure tenure of officers restricts their vision	If some pre-determined minimum tenure is known, officers with interest may like to join the organisation and work with a medium-term vision.	ECl
2.Energising SLA	2.1 Non - specified tenure of agreement	Agreement with SLA needs to be checked for a secured tenure. Even where NIC is practically working as an SLA, it may be desirable to have clarity about tenure, qualification and performance of staff and officers.	ECl for standardisation and CEOs
	2.2 Non-existent performance-indicators	Performance-based conditionalities to be put.	ECl for standardisation and CEOs
	2.3 Unprofessional agreement-clauses	Individual clauses should be revisited and vetted for enhanced effectiveness.	ECl for standardisation and CEOs
	2.4 Turnover of programmers at State/District levels	Qualification and tenure of individual key personnel to be prescribed.	ECl for standardisation and CEOs
	2.5 Ineffective communication of SLA with the Data Entry Operators with EROs/ DEOs	Regular monitoring of the work of District Programmers and Data Entry Operators to be mandated in the SLA agreement.	ECl for standardisation and CEOs /DEO

3. Office infrastructure Hardware	3.1 Dysfunctional communication channels.	Testing telephone & fax lines and obtaining additional dedicated fax lines.	CEO/DEO/RO
	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.	ECI/CEO
	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.	ECI/CEO
	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.	CEO
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.	CEO
	4.2 Incumbents likely to retire, or not in conformity with ECI guidelines.	List of such officers as are working in election-related posts, but are likely to retire around election time to be kept ready. Those election-related officers who have completed 3 years or are in home place should be marked in advance for transfer.	CEO
	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 list of officers of equivalent ranks and having good reputation to be kept ready.	CEO

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. in the year preceding the general elections.	CEO
	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.	CEO
	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.	CEO
	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. It may be desirable to create a position for budget/accounts and fill through a suitable officer from the State Accounts Department/AG office on deputation.	CEO & DEO

Pre-announcement Phase - Electoral Roll, Polling Stations

Work Area	Risk Identified	Mitigation Measures/ Action Points	Level at which the risk is to be addressed
6. Fidelity of Electoral Rolls	6.1 Non-inclusion of eligible persons.	Adequate outreach programmes to be conducted.	ERO/DEO /CEO

	6.2 Inadvertent deletions.	Deletion lists to be published, shared and communicated wherever feasible. Significant inter-state migration may take place, and even though the deletion may be technically right (on account of absence), the electors are disappointed if they return before election date to find their names deleted. It is desirable to have standard procedures for such deletions.	ERO/ DEO/ CEO /ECI
7. Efficiency and motivation of registration staff like BLOs and Data Entry Operators	6.3 Deliberate exclusion of certain sections and areas.	Appropriate publicity and efficient grievance-redressal system.	ECI/ CEO/ DEO/ ERO
	6.4 Possibility of motivated deletions.	Abnormal deletions, section-wise and part-wise, to be scrutinized.	ERO/ DEO/ CEO
	6.5 Inclusion of ineligible electors.	Cross-verification, random checks and complaint-monitoring systems to be established.	ERO/ DEO/CEO
	6.6 Repeated entries.	Scrupulous adherence to de-duplicating checks to be ensured.	ERO/DEO/ CEO
	6.7 Double registration in bordering constituencies.	Electoral rolls of bordering constituencies to be compared; special communication drive in border habitations.	CEO/DEO/ERO
	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.	DEO/CEO/ERO
	7.2 Delegating authority for bulk submission of forms.	Proper identification- cards/badges to be issued to BLOs and Data Entry Operators.	DEO/ ERO/CEO

	7.3 Incorrect field verification by BLOs.	Ensuring one-to-one coordination between BLOs and BLAs, involving RWAs in verification, so as to resolve issues when applicant is not available on inspection.	ERO/CEO/DEO
	7.4 Delay in submission of field- inputs giving scope for repeated Form-6.	Time-lines to be set and checked.	ERO/CEO/DEO
8. Ensuring fundamentals of eligibility – citizenship, age, and ordinary residence	8.1 Possibility of inclusion of foreign nationals.	The importance of unambiguous clarity on citizenship requirements to be communicated to EROs.	ERO/ DEO/CEO
	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.	ERO/DEO/CEO
	8.3 Registration of under-age persons.	Birth documents to be checked in case of young applicants.	ERO
	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.	ERO
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.	ERO/DEO/ CEO
	9.2 Bulk submission by misusing digital signature.	Programmed system controls on bulk submission of i-Forms.	ERO/DEO/ CEO

10. EVM and VVPAT Security and Management	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.	ERO/DEO/ CEO
	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.	DEO/ CEO
	10.2 Damages to EVMs in long transport.	Regional centres can be proposed for EVM exchanges.	CEO/DEO
	10.3 Inadequate and unsafe storage of EVMs.	Dedicated warehouses to be built, with required security features such as strong doors, CCTV camera, etc.	CEO/DEO
	10.4 Thin margins of EVM and VVPAT reserves.	Adequate numbers to be supplied so as to have 10% reserves; and FLC failures to be minimized with better technical support.	ECI/CEO
	10.5 Design hazards: assembled batteries in VVPAT; huge weight of VVPAT.	Continuous checking of EVM & VVPAT machines for technical improvements.	ECI/CEO/DEO
	10.6 Unused expirable items like VVPAT 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.	ECI/CEO/DEO
	10.7 Accumulating e-waste	Guidelines to be formulated for safe and environment friendly disposal of e-waste, including re-use or re-cycling.	ECI/CEO/ DEO
	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.	DEO

	10.9 Checking compatibility of VVPAT with EVM model.	In case of VVPATs being used, it is essential to check whether the model of EVM available is compatible with the model of VVPAT.	DEO/RO/ PO
	10.10 Quality of thermal paper for VVPAT	As thermal paper has a definite life, it is crucial to ensure adequate supplies of fresh thermal paper. Date of manufacturing needs to be checked.	CEO/ DEO
	10.11 Scope of complaint in case of hasty FLC in absence of political parties / candidates.	At every stage of EVM/VVPAT preparation and randomisation, it must be ensured that representatives of major political parties, candidates/agents are present; their signature should be obtained for the proceedings; subject to ECI instructions, they should be asked to press buttons for their satisfaction in respect of the correct functioning of both EVMs and VVPATs, and such events of participation by stake holders must be got videographed.	RO/DEO
	10.12 Undeleted previous data may cause avoidable doubts.	Receiving districts must resolve with the sending districts as to whether the previous data/candidate- setting on EVM/ VVPAT has been properly deleted. If not, the deletion should be ensured at the time of FLC, following ECI guidelines.	DEO
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.	ECI/CEO/DEO
	11.2 Possibility of delay in supply of security seals.	Centralised procurement, depending on poll-schedules in various states.	ECI/CEO/DEO

	11.3 Non-standard voting compartments.	State-wise agencies can be decided centrally, prescribing standards.	DEO/CEO
	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.	CEO/DEO
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.	ECI
	12.2 Diversion of CEO's attention on personnel-related litigation.	Recruit/hire a legal adviser who should have experience in election-related matters, and who should be in continuous touch with the legal team for courts.	ECI
	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.	CEO/ECI
	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.	ECI/CEO
13. Establishing polling stations	13.1 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.	DEO/RO
	13.2 Notifying buildings likely to be demolished.	Maintenance divisions of the owner departments to be contacted to avoid such structures.	DEO/RO
	13.3 Dilapidated and unsafe buildings.	Physical inspection of the building should be supported by photographs with time/date.	DEO/RO

	13.4 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.	DEO/RO
	13.5 Vulnerability of polling stations.	Analysis of vulnerability of polling stations should be done well in advance, along with the mapping of vulnerable areas.	DEO/RO
	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.	DEO/RO
	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.	DEO/RO
	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.	DEO/RO

Model Code of Conduct

Work Area	Risk Identified	Mitigation Measures/ Action Points	Level at which the risk is to be addressed
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.	CEO/DEO/RO
	14.2 Departments / Institutions take a lot of time in covering/ removing government programme achievements.	All departments to be advised in advance to identify such publicity-material and start preparations for removal/concealment.	ECI/CEO/ Central/ State Governments/ RO/ DEO
	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.	ECI/ CEO/ Central/ State Governments/ RO/DEO
	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.	ECI/CEO/ Central/ State Governments/ RO/DEO

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.	ECl/ CEO/ Central/ State Governments/RO/DEO
	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.	ECl/CEO/Central/State Governments/RO/DEO
	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.	ECl/CEO/Central/State Governments/RO/DEO

Announcement & Conduct of Poll

Work Area	Risk Identified	Mitigation Measures/ Action Points	Level at which the risk is to be addressed
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.	ECI/CEO
	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.	ECI/CEO
	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.	CEO
	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.	CEO
17. Media communication	17.1 Gaps in communication cause uncertainty, confusion and rumours.	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.	CEO

	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.	ECI/ CEO
	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.	RO/DEO
	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.	DEO/MCMC/ CEO
	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.	DEO/ CEO/ MCMC
	17.6 Casual comments on Media engagement	All election officials must show restraint in media interaction	CEO/ DEOs/ROs/ Observers
18. Continuous updating of Electoral Rolls	18.1 BLOs not being in place. Long-standing BLOs may develop bias.	Meticulous revision of BLO contact details. There should be a mix from various departments.	ERO/DEO

	18.2 Bulk submission of registration forms by BLAs.	System to restrict bulk feeding of Form-6.	ERO/ DEO / CEO
	18.3 Approval of Form-6 without due checking.	Abnormal additions part-wise to be scrutinized.	ERO/ DEO
	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.	ERO/ DEO/ CEO/ ERO
	18.5 Unauthorised approvals at the subordinate levels.	Frequent changes of passwords or biometric identification system should be kept in place.	ERO/ DEO
	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. Special care to be taken to decide i-forms received through NVSP portal. Updated progress on ERMS needs to be integrated on NVSP on a real-time basis, otherwise even when the application has been approved, the status shown on NVSP may remain 'under process'.	DEO/ DEO/ CEO/ I/IDEM
	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 electors to be maintained part-wise in every assembly constituency.	ERO/ CEO/ DEO
	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.	DEO / ERO

	<p>18.9 Acknowledgement of Form-6 not given to applicants, thereby preventing tracking of pending applications.</p>	<p>Generation of specific acknowledgement numbers to be made compulsory, by which processing of forms can be tracked by the applicants.</p>	<p>ERO / CEO/ DEO</p>
	<p>18.10 Wrong modifications by electors of other electors' details.</p>	<p>Any modification in internet mode to be made password-protected so that no one is able to modify other electors' details.</p>	<p>ECI/CEO</p>
	<p>18.11 Delay and confusion in delivery of EPIC.</p>	<p>Part-wise segregation of EPICs should be made after approval of registration. Under no circumstances should EPICs be got distributed by political representatives.</p>	<p>ERO / DEO</p>
	<p>18.12 Not maintaining print copies of registration forms.</p>	<p>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.</p>	<p>ERO / DEO</p>
	<p>18.13 Missing certain segments like marginalised persons, women, youth, disadvantaged and poor people, tribals in remote areas, transgenders, ex-servicemen, etc.</p>	<p>Special drives with focus on the less represented citizens; camps can be conducted in specific locations after giving due publicity; mobile registration vans can cover such segments.</p>	<p>ERO / DEO</p>

	18.14 Involvement of NGOs/ youth associations with political inclination for voter registration.	System to restrict bulk feeding of Form-6. Due diligence to be observed in associating with civic organisations/ NGOs.	ERO / DEO
	18.15 Existence of repeated entries, dead or shifted electors, and errors in electoral rolls.	Abnormal additions part-wise to be scrutinized.	DEO / ERO
	18.16 Choking of the system on account of pushing of thousands of applications in the last few hours.	Daily monitoring by DEO of pendency of forms with every ERO/AERO.	ERO / DEO
	18.17 Incomplete coverage of PER and EPIC in certain parts.	Special drives to be conducted in locations with less than average EPIC/PER coverage. Identification should be done polling-station-wise.	ERO/ DEO
	18.18 Possible influencing or intimidation of BLOs.	Periodic supervision of BLOs' work, supervisors to provide guidance and support to BLOs, particularly in urban areas.	ERO/DEO
	18.19 BLOs not getting access to secured apartments/ habitations.	RWAs and community organisations to be got connected with BLOs.	ERO/DEO
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.	ECI/CEO

	<p>19.2 Machine-driven programmes can download entire database to do unauthorized data-analysis for motivated misuse or mischief.</p>	<p>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.</p>	ECI/CEO
<p>19.3 Free soft copies to political parties subject to data-processing and categorizing electors for political gains.</p>		<p>Only print copies may be given to political parties; soft copies of electoral rolls should be 'view only' type.</p>	ECI/ CEO
<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>	ECI/CEO
<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, Adhaar 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>	ECI/ CEO

	<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. For any academic or other research/information dissemination purposes obtaining permission should be made mandatory.</p>	ECI/ CEO
	<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>	CEO/ DEO
	<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 basis. 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 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).</p>	ECI/ CEO

	19.9 Inadequate Disaster Recovery Systems.	<p>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.</p>	ECI/ CEO
	19.10 Excessive stress on technical manpower may lead to errors and breakdown.	<p>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.</p>	CEO/ DEO / ERO
20. Poll Processes: Nomination, Scrutiny, withdrawal and Symbol Allotment	20.1 Incorrect notification about designation of RO may lead to legal complications.	<p>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.</p> <p>It may be desirable to have a new office seal made if so required.</p>	CEO/ DEO
	20.2 Hasty receipt of nomination papers and documents may lead to avoidable rejections later.	<p>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 rectified to the satisfaction of the RO.</p>	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.	DEO / RO
	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.	DEO / Observer/ RO
	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.	RO/ IIIDEM
	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.	RO/ IIIDEM
	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.	RO/ IIIDEM
	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.	RO/ IIIDEM

	<p>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.</p>	<p>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 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>	RO/ IIIDEM
	<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 may not vitiate an election, but wrongful rejection can certainly become a ground for challenging the election.</p>	RO/ IIIDEM
	<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>	RO
	<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>	RO/ IIIDEM

	<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>	RO / IIIDEM
	<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. Name and signature can be taken behind a spare copy of the photograph that can be kept in nomination file for future references.</p>	RO
	<p>20.15 Mis-match of photographs of candidates.</p>	<p>Photographs of candidates should be collected under their signature. Before the design of the ballot paper is finalised, the photographs in the draft ballot paper must be got compared with the original nomination papers so as to prevent any mismatch.</p>	RO / D E O / CEO
<p>21. Printing and security of Ballot Papers</p>	<p>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.</p>	<p>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.</p>	RO/CEO

	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.	RO
22. E-Postal ballot	22.1 Faulty preparation of Postal Ballot Paper	Adequate Training must be imparted. All safety protocols must be followed.	RO/DEO / CEO/ IIIDEM
	22.2 Mistake in sending of E-Postal Ballot in secured environment	All safety protocols must be followed. Instructions should accompany E-Postal Ballot on how to fill and how to send, so as to avoid high rate of rejection of such ballot papers.	RO/ DEO / CEO/ IIIDEM
	22.3 Repeat entries of Service Voters.	Timely updating to be done of addresses in respect of Service Voters. Repeated entries should be deleted following due procedure.	RO/DEO
23. Postal ballot	23.1 Faulty printing of Postal Ballot	Must take all precautions as listed in the ECI's instruction.	RO
	23.2 Mistake in distribution of Postal Ballot; Inadequate reach to the election duty staff including security personnel.	List of election duty staff must be carefully maintained. Postal Ballot Nodal Officer (PB) must be a senior administrative officer to ensure the reach of PBs to all concerned with regular monitoring and follow up.	RO/ DEO / CEO
24. Vulnerability mapping and security plan	24.1 '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.	CEO/DEO / RO

	<p>24.2 Leaving police to decide the degree of sensitivity may lead to gaps in election-management for a clean poll.</p>	<p>While inputs must be obtained from the police authorities, vulnerability mapping should be decided by the District Election Officer and the ROs who are actually responsible for a free and fair election.</p>	CEO/DEO / RO
	<p>24.3 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 District Election Officer 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>	DEO
	<p>24.4 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>	ECI/ CEO/ DEO
	<p>24.5 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>	ECI/ CEO/ DEO

	<p>24.6 Underutilization of non-force measures such as videography, web-casting may result 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>	<p>ECI/ DEO CEO/ DEO</p>
	<p>24.7 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>CEO/DEO</p>

25. Personnel Management	25.1 Not finding adequate numbers of polling personnel, particularly female polling staff.	<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>	CEO/DEO
	25.2 Deployment of such staff as are not fit for strenuous jobs.	<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>	DEO

	25.3 Deployment of exempted categories may lead to litigation later.	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.	CEO/ DEO/ IIIDEM/ RO
25.4	Inadequate training may lead to inefficiency, errors and possible vitiation of poll-process.	Training of Presiding Officers and Polling Officers must be done in a meticulous manner in a classroom 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. POs must be told to inform the supervisory officers in case of any serious difficulty or unexpected happening.	CEO/ DEO/ RO
25.5	Inadequate hands-on training on EVMs and VVPATs	Presiding Officer and at least one polling officer for every polling station must be given hands-on training on handling EVMs and VVPATs of the models to be used. Which parts are to be sealed and which must not be sealed (battery compartment, for example) and the proper way of sealing should all be taught in a practical manner.	DEO
26. Level – Playing field in campaign period	26.1 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.	CEO/ DEO/ RO

	<p>26.2 Delayed response to complaints affects the morale of law-abiding citizens.</p>	<p>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.</p>	CEO/ DEO/ RO
	<p>26.3 Enforcement agencies working without coordination.</p>	<p>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.</p>	CEO
	<p>26.4 Inadequate coordination with neighbouring states may allow interstate movement of illegal cash, liquor or goods.</p>	<p>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.</p>	CEO/DEO
	<p>26.5 Ignoring coastal security can be a cause of concern.</p>	<p>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.</p>	CEO/DEO

	<p>26.6 International land borders can be a source of infiltration for disrupting poll-process.</p> <p>26.7 Undeposited firearms can be a source of trouble.</p> <p>26.8 Illegal firearms can cause violence to intimidate voters.</p>	<p>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.</p> <p>ECI instructions on deposit of licensed arms must be followed quickly.</p>	<p>DEO/CEO</p> <p>CEO/DEO</p>
<p>26.9 Compartmentalised checking at department check posts.</p>	<p>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. Instead of just having a target-based approach on depositing legal arms, special attention needs to be given by the police authorities for search and seizure of illegal / unlicensed arms.</p> <p>The check posts of Forest Department check for illegal forest produce, while the check posts of Commercial Tax Department look for unaccounted goods. During the election period, such check posts should be re-oriented to function as integrated units of MCC enforcements, apart from doing their departmental jobs. As far as feasible, CCTVs should be installed at such check posts to improve efficiency.</p>	<p>RO/DEO</p>	
<p>26.10 Target-approach on execution of warrants should not be allowed to miss the cases of grave nature.</p>	<p>Instead of just trying to achieve a respectable figure of warrant-executions, careful analysis should be done of pending warrants so that the limited time and resource are utilised on priority cases of public order and electoral malpractices.</p>	<p>RO/DEO</p>	

	<p>26.11 Political influence in providing state security of gunmen may cause intimidation or undue influence among electors.</p>	<p>District Election Officer and SP/Police Commissioner should review the cases of any possible bias in providing on denying state security to political functionaries, and take necessary corrective action in advance.</p>	RO/DEO
<p>27. Conducting free, fair and peaceful polls</p>	<p>27.1 Check-posts get abandoned on the eve of poll, allowing unrestricted movement of prohibited items.</p>	<p>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.</p>	ECI/ CEO/ DEO
	<p>27.2 Election machinery's focus being on Polling Stations, the vulnerable areas do not get adequate protection during the day and night prior to poll.</p>	<p>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.</p>	CEO/DEO
	<p>27.3 Last night contacts by party functionaries allows scope for extraneous influences.</p>	<p>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.</p>	ECI/ CEO/ DEO
	<p>27.4 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>	CEO/ DEO/ RO/Observer

	<p>27.5 Inadequate protection of EVMs and poll-material in case PRO does not stay overnight.</p>	<p>By way of GPS monitoring, stay of PO and other essential staff should be ensured on the night before poll-day.</p>	DEO/RO
	<p>27.6 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 a week before the poll day, so that corrective action can be taken well in time.</p>	DEO/RO
	<p>27.7 Non-deletion of mock-poll votes may result in all votes becoming invalid. Removal of mock-poll paper slips from VVPATs.</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. Mock poll paper-slips from VVPATs must be removed and stamped properly.</p>	RO / DEO / Observer
	<p>27.8 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>	DEO/RO
	<p>27.9 Malfunctioning of EVMs/VVPATs during the poll.</p>	<p>Spare EVMs/VVPATs to be kept with mobile supervisory units, along with technical experts for quick replacement of EVMs/VVPATs.</p>	RO/DEO
	<p>27.10 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>	PO/RO/DEO

	27.11 Booth-capturing with apparent force.	Last hours of polls should be monitored continuously. POs 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.	PO/RO/DEO
	27.12 Silent rigging.	Abnormally high polling in last one hour must be investigated. Mock-poll data, presence or absence of polling agents, hourly poll figures, PO 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.	RO/ Observer/ DEO/CEO
	27.13 Casual challenges of VVPAT print to be discouraged.	Presiding Officers must be instructed not to allow frivolous complaints about EVM/VVPAT. Every complainant should be made to understand the consequences of a casual or misleading objection, before the test-checking is allowed.	DEO/RO/PO
	27.14 Voter identification- Mismatch between English / vernacular versions of electoral roll (Alphabetical roll)	(i) All Polling teams need to be made available all four versions of roll and (ii) adequate training of polling officials, political parties is must.	DEO/RO/PO

Counting

Work Area	Risk Identified	Mitigation Measures/ Action Points	Level at which the risk is to be addressed
28. Counting Hall	28.1 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.	RO/ CEO/ DEO
	28.2 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.	DEO/ RO/ CEO
	28.3 No inspection of the counting hall.	Mandatory inspection by the RO, much before the due dates.	RO
29. Security of Counting Hall	29.1 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.	DEO
30. Strong Room	30.1 Failure in joint inspection as per ECI's instructions.	Daily report on the dashboard to be generated. Strong rooms must be got completely sealed and insulated after depositing polled EVMs/VVPATs, and CCTV must be kept in a functional mode.	CEO/DEO/RO
	30.2 Inadequate space for VVPATs	Wherever VVPATs are being used, strong rooms should have adequate space for EVMs along with VVPATs.	DEO
31. Counting Personnel	31.1 Limited focus on Counting Personnel requirements	Adequate preparation for the database and updation.	DEO/RO
	31.2 Limited availability of Micro Counting Observers	Advance preparation to be made to identify and train Micro Observers as per ECI guidelines.	DEO/ RO
	31.3 Poor Training of Counting Personnel	Scheduled training with focus on hands on session well in advance	IIIDEM/ DEO/ RO

32. Counting Hall Management	32.1 Lack of awareness amongst the candidates, and other stakeholders about entry restrictions	Written as well as one-to-one communication by the DEO/RO.	RO/ DEO/ Observer
	32.2 Lack of Communication with security agencies on entry restrictions.	Advance meeting with the SP. Proper briefing of those officers who will actually manage entry/exit points.	RO/ DEO/ Observer
	32.3 No attention to detail on seating arrangement, electricity, tele-connectivity	Alternative arrangement to deal with power failure is a must. In particular, computer-systems must always be protected from power failure.	RO/ DEO/ Observer
	32.4 Media communication Gap	Adequate arrangement for dissemination. Prior consultation with the State Directorate of Information and publicity should be done so as to avoid last-moment rush for media passes.	DEO/ RO
33. Postal Ballot Counting	33.1 Absence of focus on PB	RO and Observer must keep a close watch.	RO/ Observer
	33.2 In equal and wrongful rejection	All rejected PB must be checked by the RO	RO
34. Result Declaration	34.1 Anxiety in close contest	RO and observer must take all precautions, as listed by the ECI, before announcing such results. Round-wise tallying and announcement must be done.	RO
	34.2 Frivolous complaints to stop counting or to do recount or to count VVPAT paper-slips.	Along with videography of the entire process, the result of every round of counting should be shared with the candidates and announced properly, so as to counter unsubstantiated complaints later for a re-count. As far as the request to count paper-slips is concerned, it has to be the decision of the Returning Officer, who should be extremely careful, and if need be consult Election Commission before allowing any count of the printed slips of VVPAT.	DEO/ RO

Post Election

Work Area	Risk Identified	Mitigation Measures/ Action Points	Level at which the risk is to be addressed
35. Sealing of Strong Rooms	35.1 Hurried sealing may cause loss of machines / documents.	After the results are declared, EVMs, and paper vote slips from out of VVPATs, along with all statutory covers should be sealed as per the prescribed process in a careful manner. Strong room should be sealed in presence of candidates/agents, in supervision of a senior responsible officer.	ROs/ Observers
36. Election Petition	36.1 Non-Communication of filed EPs 36.2 Lack of clarity on EVM Petition	CEO Must establish contact with the Registry of High Court and monitor the progress of EPs, keeping the ECI informed. CEO to periodically monitor the petitions where any direction to keep the EVMs are issued.	CEO CEO
37. Election Expenditure returns	37.1 Delay in sending expenditure report in ECI format. 37.2 Unexplained and unresolved discrepancies in expenditure figures.	DEOs and ROs must ensure that as per ECI guidelines, all expenditure returns are sent to ECI well in time. Wherever there are differences in the expenditure figures as submitted by the candidates and as given by the Expenditure Observers, the figures need to be explained by the RO/DEO, before being sent to the CEO/ECI. It may be advisable to prescribe a time frame in which the DEO must finish this job, and till then they should not be allowed to leave the district.	RO/DEO/ CEO/ECI DEO/CEO/ ECI
	37.3 Notices not served on time may cause delay in decision-making.	DEOs need to ensure that all such notices issued by ECI are delivered to candidates, with acknowledgement, and timely replies are taken from the candidates, on which DEOs must provide their clear opinion before submitting to the ECI.	RO/DEO/ CEO/ECI

CHAPTER 4

RISKS RELATED TO RAJYA SABHA AND LEGISLATIVE COUNCIL ELECTIONS

Table 2: Elections to Council of States (Rajya Sabha)

Work Area	Risk Identified	Mitigation Measures / Action Points	Level at which action to be taken
1. Election expenditure monitoring	Since there are no statutory limits, excessive expenditure may be incurred to influence the electors.	Legal provision by way of amendment is required to cover RS/LC elections under expenditure-limits	ECI
2. Inappropriate expenditure to disturb level-playing field	As there is no format of submitting election-expenditure, exorbitant amounts may get spent in illegal/inappropriate ways.	Legal provision along with administrative instructions required to oblige the contesting candidates and the parties to submit expenditure details to the Returning Officer / Commission.	ECI
3. Electors under inducement or restrictions	Inappropriate and unethical influence on electors through organized 'camps'.	Some fundamental instructions are required for the Parties and Candidates to guide their action during election.	ECI
4. Freedom of choice for electors	Allegations of duress or restraints imposed by the pressure groups if an elector does not turn up.	Voting is neither mandatory, nor can any whip be issued as it is not a voting under any legislative process, so the Returning Officer must ensure, as stipulated under Rule 69, Conduct of Election Rules, 1961, that a notice has been sent to and received by every elector notifying the date, time and place of poll.	RO

5. Secret ballot of Independents	Section 59, RP Act, 1951 and Rule 39AA, Conduct of Election Rules, 1961 provide that for Council of States elections there will be Open Ballot in respect of electors belonging to political parties. No such transparency is prescribed for Independents, whose votes become subject to intensive pressure.	In the absence of any legal provision, such members as are not subject to party regulations are not required to show their ballots. A suitable legal provision is needed.	ECI
6. Ministers as Election Agents may disturb level-playing field.	Since a Minister or a sitting MLA may also be made an agent, such strong political functionaries may exercise undue influence and even pressurise the election authorities.	Qualifying restrictions may be made so as not to allow very strong political functionaries to affect the smooth functioning of poll-process.	ECI
7. Misplacing/ replacing of marking instruments	The possibility of using an unauthorized instrument for marking needs to be precluded.	Pens / marking instruments can have ECI symbol and should be issued while the elector is entering the voting compartment, and must be taken back when he/she comes out after marking preference.	ECI
8. Unnecessary demands for companions to illiterate / blind / infirm elector	As no procedure is prescribed, the Returning Officer has to be guided by his own judgment and also faces the prospect of allegations.	While literacy records can be checked with other documents like register of proceedings, etc., there has to be a prescribed procedure to accept the condition of visual challenge or infirmity. Medical certificates must be insisted on in case of applying for companion by infirm electors.	ECI / RO

Elections to the Legislative Councils (Graduate/Teachers/Local Bodies)

Work Area	Risk Identified	Mitigation Measures / Action Points	Level at which action to be taken
9. Influencing electors	Absence of expenditure scrutiny requirement gives scope for applying unethical methods of approaching electors.	Detailed instructions in letter No.322/LC/INST/2010-CC&BE, dated: 24th February 2010 mention (para 3.VII) that political meetings will be videographed, and Ministers and other important political functionaries shall be video-tailed.	ECI
10. Companion for illiterate	<p>Lack of clarity on how to decide literacy status may lead to seeking companion without justification.</p> <p>Instruction No.322/LC/INST/2010-CC&BE, dated: 24th February 2010, stipulates at para 9.vii that if an elector wishes to get a companion, he must give intimation to the RO at least 3 days before the date of poll.</p> <p>This same instruction further adds that Presiding Officer will take action as per Rule 40A in case of illiterate, blind or infirm voter. This may lead to a situation where an elector has not obtained prior permission from the R.O. and yet presents a request for companion before the Presiding Officer on the day of poll.</p>	The literacy status must be decided much before the actual date of poll. Unambiguous instructions need to be issued.	ECI / RO

11. Companion for blind infirm	<p>Absence of guidelines on deciding blindness/infirmary may also lead to allegation when left to subjective assessment of Presiding Officer. There are no specific instructions on how to decide about infirmity or blindness status. Subjective assessment of the Presiding Officer may not be consistent.</p>	A clear procedure needs to be prescribed, with emphasis on a medical certificate in cases of visual challenge or infirmity.	ECI
12. Unauthorised handling of ballot papers	<p>Scope of taking ballot papers out of polling stations and / or inserting spurious ballot papers in the ballot box.</p> <p>Rule 39(2)(d) of the Conduct of Election Rules, 1961 stipulates that an elector can be asked to show to the Presiding Officer the distinguishing mark on the ballot paper.</p> <p>In order to further strengthen the surveillance on poll day, the ECI has issued instructions dated: 19.12.2015 for ensuring integrity of poll-process.</p> <p>Instructions do not make it mandatory for Presiding Officer /Polling Officers to check the Distinguishing Mark/Signature on the back of the ballot paper, before it is inserted.</p> <p>There are no instructions to frisk the electors.</p>	Detailed instructions need to be issued.	ECI

<p>13. Vitiating voting by 'Tasmanian dodge'.</p>	<p>In the absence of proper checking/frisking, the elector may carry a paper similar in colour of the actual ballot paper; and then fold and thrust it inside the ballot-box, carrying out the genuine ballot-paper, which can then be marked outside, to be put into the box by the subsequent elector who in turn takes out his own ballot paper.</p>	<p>Even if one such mischief goes unsupervised, there may be a chain of such vitiated ballot papers. Therefore, ECI instructions on checking the Presiding Officer's seal on the back of the ballot paper must be complied with before allowing the ballot to be put inside the box. Besides, ballot box should be kept directly in front of and in close proximity of the Presiding Officer. Proper checking of electors should be done to ensure that they do not bring in or take out any such paper.</p>
<p>14. Secrecy of ballot</p>	<p>By way of electronic camera, photo of the marked preference may be taken by electors.</p>	<p>No electronic equipment should be allowed to be taken inside the polling station by electors.</p>

CHAPTER 5

CONCLUSION & RECOMMENDATIONS

Continuous working with the risks by way of identifying the risks and their causes, collecting relevant information and analysing them for monitoring purposes are pre-requisites for risk management. Review of risk matrix at regular intervals may be required to keep the risk list updated. This Manual has listed most possible risks that Election Managers may encounter, at field level during the elections to Lok Sabha and Legislative Assemblies, throughout electoral cycle. Some of these risks may prove fatal to the election unless attended efficiently and effectively on time. Along with the risk lists, mitigation strategies and the level at which these risks are to be addressed have been suggested. The risks in the conduct of elections to Council of States and Legislative Councils have also been listed.

The Manual is providing a check list of possible risks for functionaries based on the existing ECI instructions and experience in election management so that appropriate planning towards risk mitigation can be done. Since risks can have local variance, all risks may not be relevant for a given area. But additional risks may be applicable to a locality. Identification of risks can be based on some broad indicators and probing on the probable reasons for such a risk situation. For example, low voter turnout in an area can be due to multiple risks and those risks vary over regions. The Commission by way of prescribing vulnerability mapping exercise and KABBP baseline surveys has brought in standardisation and the practice has been institutionalised. Beyond data being collected, there can be other subjective decisions to be made by the field level functionary to decide the priority to be attached to a probable risk materialisation and to initiate risk mitigation strategies.

From the above, it is clear that broad indicators for risk identification are necessary. There will be several such risks to be addressed simultaneously. To prioritise actions, assessment of risks is also necessary. Following from the discussion on the international best practices of risk management, it can be concluded that for identification and assessment, decision tools can be used. There are many decision tools available and the appropriate one can be chosen based on the data and resources available. Decision tools can be as simple as a brain storming session to a complex probability modelling. These are available

in ISO 31010. To keep away technical discourse, the details on decision tools are not included in this Manual. Based on the facts collected and other subjective information, Indian elections are managed well by local ingenuity till this time. But there is definite benefit if field machinery uses decision tools as well. Human ingenuity is unparallel and there is no decision model to compete with it. If there are quantifiable facts, and if there is possibility of deciding the hierarchy by any qualitative methods like *brain storming*, analytics platforms can be prepared with robust decision tools. This will support the wholly ingenious exercise of deriving insights from the facts. This will definitely reduce the solution space to be probed further for a risk/ problem. Human sensibility can work in the reduced solution space demarcated by the quantitative methods to arrive at a justifiable solution.

In an electoral cycle, the same risks will have to be monitored continuously after taking mitigation action. In the process, information about the same risks will be added at regular intervals. The stress in processing of information being added at various points in time of an electoral cycle will also be reduced by use of IT platforms. Based on the output from such decision platforms and local ingenuity, strategies to address threats, vulnerability, risks can be addressed. Design of the IT platforms with analytics can be further worked upon by the Risk Management Division of ECI. Examples of international practices and ISO framework support designing of suitable IT platforms which serve as decision tools/ analytics. This is also in line with the Commission's strategic plan 2016-25 on risk management.

In conclusion, every member of election machinery must acknowledge the need and urgency to mainstream the risk management in the overall election management for the desired efficiency and effectiveness. This would necessarily require the following:

- Evidence-based assessment of risk situations before every election.
- Designing suitable risk management strategies within the overall framework of this risk management manual.
- Close monitoring and supervision of risks, which can prove fatal to the election process.
- Regular training on risk management to the field machinery

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- Sharing of risk list after every election for the benefit of other CEOs and for inclusion of such risks in the ECI manuals.

At the level of ECI, following actions will be taken so that risks at the field level are addressed effectively:

- Updating the documents/instructions prior to each scheduled election
- Designing and implementing election capacity building programme effectively and in time-bound manner.
- Continued focus on management of those risks, which may prove fatal to the electoral process, if not attended effectively.
- Strategic brush-up on training during the election period.
- Deployment of IT tools and personnel for the purpose of risk management. However, IT must be used only as a tool, and it should not substitute the human ingenuity.
- Setting up of a risk management division in the Commission

ELECTION COMMISSION OF INDIA

Nirvachan Sadan, Ashoka Road, New Delhi-110001

No 193/6/2/2015(WG)

Dated: 31.08.2016

ORDER

In partial modification of office order of even no. dated 03.02.2016, whereby a Working Group was constituted to prepare Electoral Risk Management Manual, is hereby reconstituted as under:-

(i)	Chief Electoral Officer, Karnataka	Chairman
(ii)	Chief Electoral Officer, Uttar Pradesh	Member
(iii)	Chief Electoral Officer, Delhi	Member
(iv)	Chief Electoral Officer, Odisha	Member
(v)	Sh. Sudeep Jain, Director General	Member
(vi)	Dr. Noor Mohammad, Consultant	Member
(vii)	Director (EDMD), ECI	Convenor
(viii)	Secretary (Planning), ECI	Member
(ix)	Representative from International IDEA	Member

By order


(Standhope Yuhlung)
Principal Secretary

To

1. PSO/Sr.PPS/PPS to CEC, ECs
2. PPS to DEC(US)
3. PPS to DEC(VD)
4. PPS to DEC(SS)
5. PS to DG(SJ)
6. All members of the Committee
7. Guard file

COUNTRY EXPERIENCES

IDEA in Electoral Risk Management

International IDEA's Electoral Risk Management Tool (ERMT) is designed to help building user's capacity to: understand electoral risks, analyse risk data, and take timely and well informed prevention and mitigation action. International IDEA has included 36 risk factors in ERMT. These are given in Box 1.

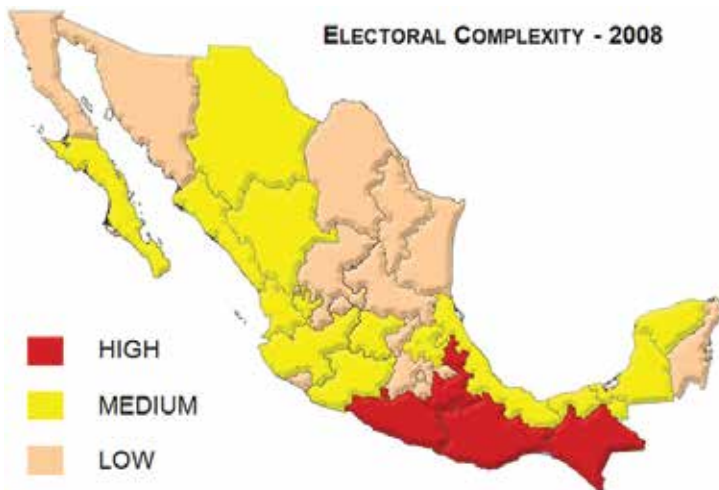
Box 1: Risk factors as included by IDEA in the ERMT

Internal factors	External factors
<p>The electoral legal framework Contested electoral law Unfit electoral system Inadequate electoral administrative rules</p> <p>Planning and preparation for the implementation of electoral activities Poor performance of the electoral management bodies An inadequate system for the resolution of electoral conflicts Inadequate operational planning Inadequate funding, financing and budgeting Inadequate electoral security arrangements</p> <p>Training and information Poor training for electoral officials Lack of training for political parties and media Lack of training of security sector agencies A poor voter information campaign</p> <p>Registration Problematic voter registration Problematic registration of political parties and candidates Problematic accreditation of domestic and international observers</p> <p>Electoral campaigning Unequal media access and favouritism Provocative use of media by political parties</p>	<p>Poor socio-economic conditions Political and social exclusion Conflict relating to changing power dynamics Gender-based discrimination and violence The presence of non-state armed actors The presence of organized crime groups Genocide, crimes against humanity and war crimes Human rights violations Environmental hazards Unethical media reporting</p>

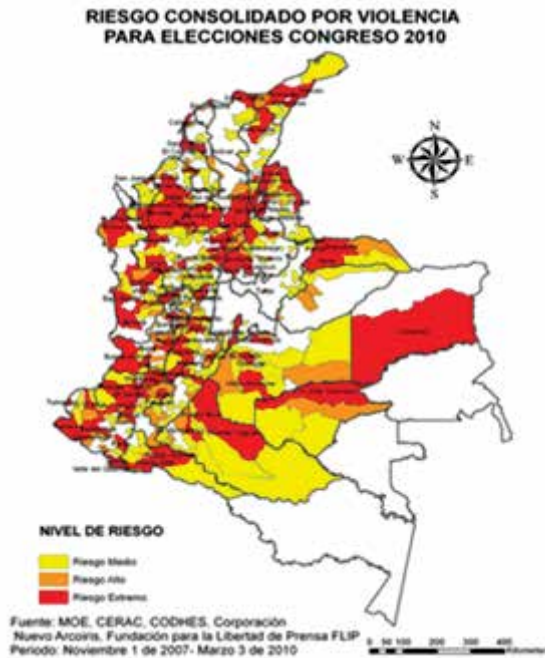
<p>Provocative party rallying Provocative and violent actions by political parties.</p> <p>Voting operations Insufficiency, destruction and loss of sensitive and non-sensitive materials Lack of transparency of special and external voting Problematic election-day operations Problematic ballot counting and result tallying</p> <p>Verification of election results Poor management of election results Poor management of the final round of electoral appeals Rejection of election results</p>	
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The ERM Tool is integrated in a single desktop software application. The knowledge base - provided in the form of a digital library - distinguished between internal (process-related) and structural (context-related) risk factors. An analytical instrument allows: creating analytical models; uploading digital data in different formats; use of GIS (geographical information system) features and trend functions to generate risk alerts and create/maintain a Risk and Action Register. The prevention and mitigation module includes approximately 100 comparative action points, distinguishing eight electoral phases and three categories of responsible stakeholders. All modules can be fully customized to reflect user's experiences and circumstances. The ERMTool has a proven value in assisting EMBs worldwide in improving decision making by allowing them to gain situational awareness in a real time - or close to it, which is the necessity for informed and conflict sensitive decisions.

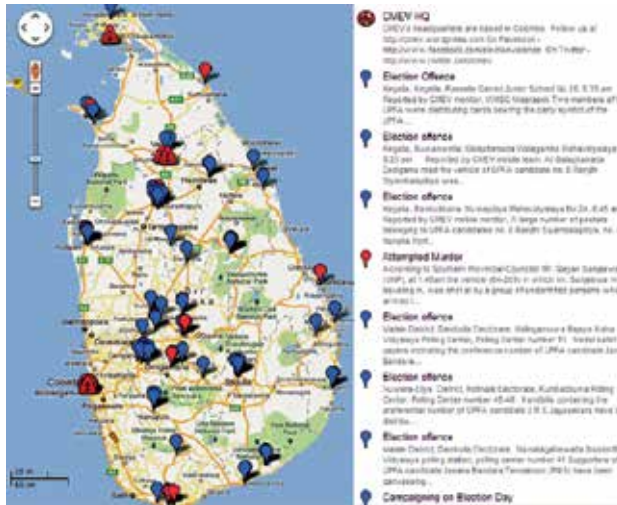
[Instituto Federal Electoral \(IFE\) Mexico](#) is generating electoral risk maps by assessing risks associated with different factors, including drug trafficking, homicides, robbery, kidnapping, poverty and electoral complexity. Risk levels are projected on a scale of low, mid or high risk. Relevant data are generated by IFE or obtained through cooperation and exchange with other government agencies. The risk analysis, presented through colour-coded geographical maps, is used by IFE and other agencies to ensure conflict-sensitive planning of electoral operations and related security arrangements.



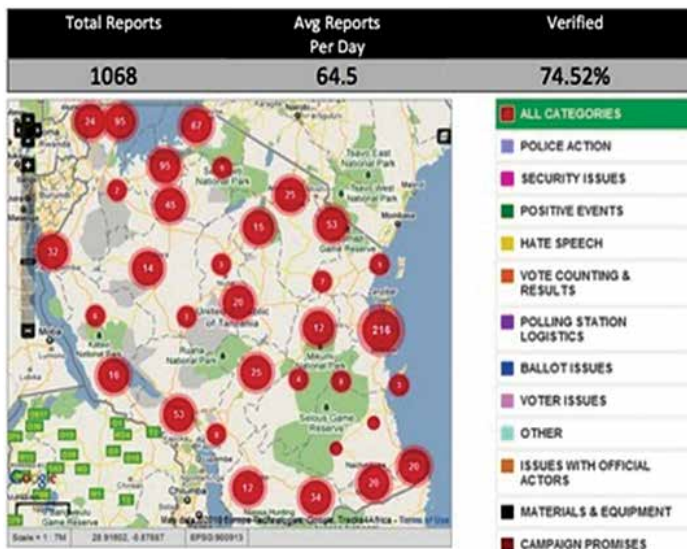
La Misión de Observación Electoral (MOE) in Colombia is generating electoral risk maps by analysing the rough data sets, some of which are produced and made available by the government. MOE undertakes statistical tests to establish regions in which data deviates. Data sets might include voter turnout figures. Risk analysis, presented through colour-coded geographical maps, is used to inform the broader public, including academics and news agencies, and the government about electoral risks. The established quality of the analysis has influenced the government's actions and parliamentary discussions.



Centre for Monitoring Electoral Violence (CMEV) in Sri Lanka is generating online maps of election-related incidents collected by civil society networks. Factors observed include incidents relating to voter intimidation, campaigning irregularities, violation of electoral procedures, threats against electoral monitors and attacks on candidates. CMEV is presenting this data by placing the static markers on a Google Map. Markers point to a geographical location where incidents have taken place. Information is shared publicly, through media and websites, with the intention to stimulate government action.



USHAHIDI is an online platform available as a global public facility. The UCHAGUZI version is customised to gather information on election-related conflicts and violence. The platform uses Google Maps to present the data on election-related incidents collected through crowdsourcing. Data can be presented in the form of static markers, pointing to individual incidents, or through the aggregate numbers. The platform is used by a number of civil society organisations to inform public or organisations responsible for conducting elections.



International IDEA has developed an ‘**Electoral Risk Management Tool**’, which is being tested in several countries. This desktop application allows the user to create a country model and populate it with the relevant factors. Risks associated with the model factors can be presented in colour-coded maps, trend charts, static markers and aggregated figures shown on a map. The tool is designed to enhance the early warning and violence prevention capacity of organisations mandated to organise credible and peaceful elections, such as EMBs and security sector agencies (SSAs), as well as other interested organisations. The tool is offered as a global public good since 2013.

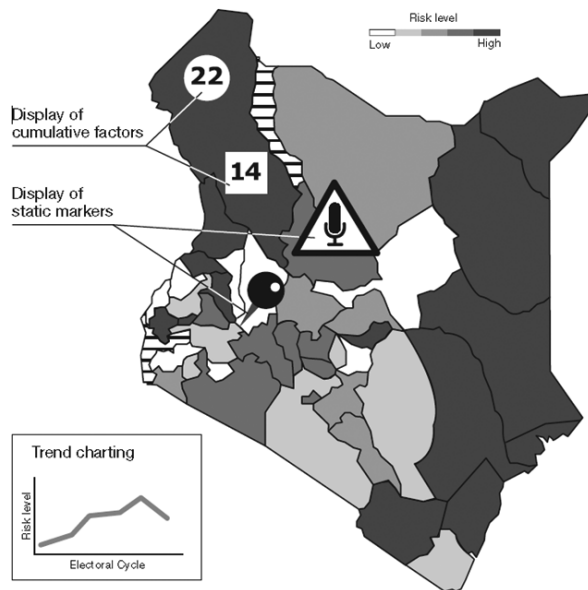


Figure above: Example of a colour-coded map with static markers and cumulative factors, accompanied by a trend chart.

This comparative overview portrays the main IT-based methods for presenting electoral early warning analysis and highlights their advantages, disadvantages and synergies:

Geographical colour-coding is used to present risks associated with given factor(s) in different administrative or geographical regions. Data are presented on a map, and risk levels are coded in colour. This type of risk mapping is useful for communicating complex risk concepts in a simple and understandable way, but the disadvantage is that it allows only for a snapshot analysis. If the data are collected in successive rounds, geographical colour-coding cannot provide an insight into changing trends. This method is therefore particularly useful for illustrating risks associated with structural factors.

Trend charting is a widely used analytical methodology that is applied less often in the field of electoral violence early warning. Trend charts are useful in providing insight and communicating information about the dynamic factors whose risk properties may frequently change. The disadvantage is that it requires methodologically consistent and frequent data collection, which entails skills, time and resources. However, the combination of trend charting and geographical colour-coding methodologies offsets the deficiencies.

Geographical static markers are valuable analytical indicators for presenting the dichotomous variables on geographical maps. Markers pinpoint the location of an incident, enabling focused mitigation action and prevention of future incidents. The density of static markers in the region will be indicative of the risk levels and the level of action required. The disadvantage of this method is that it records events that have already happened. Furthermore, the presentation of a large number of static markers on small size maps may be messy.

Aggregated figures presented on geographical maps are used to point to the dimension of a factor, for example the aggregate number of incidents in a given region. This methodology may be used to aggregate and numerically present incidents recorded through static markers and thus improve and simplify their presentation.

There are other methodologies that have potential for a greater use in addressing election-related violence through integration with IT platforms. One is the 'Scenario Development and Futures Forecasting' tool. This methodology is particularly helpful in building the users' recognition and understanding of how situations can develop, and assists in identifying critical risk factors and vulnerabilities that could contribute to electoral violence, as well as opportunities for prevention. It has been applied in Nepal, specifically for elections, and Cyprus, Northern Ireland, Sudan and elsewhere for peacebuilding more broadly. While it is not widely known in work on elections, it is a tool that is practical and easy to implement and can contribute significantly to raising shared understanding and recognition of potential risks for violence.

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भारत निर्वाचन आयोग

Election Commission of India

Nirvachan Sadan, Ashoka Road, New Delhi-110001
Website : www.eci.nic.in, Tel. 011-22305205, Fax : 011-23052219