**Edition 2**

सत्यमेव जयते

# MANUAL ON ELECTORAL RISK MANAGEMENT 2023

भारत निर्वाचन आयोग
**Election Commission of India**
Nirvachan Sadan, Ashoka Road, New Delhi-110001

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# ABBREVIATIONS

| | | |
|---|---|---|
| AEC | : | Australian Election Commission |
| 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 |
| KAP | : | Knowledge, Attitude 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

The Election Commission of India has created a benchmark in electoral management which is appreciated the world over by organizing and conducting 17 General Elections, 401 General Assembly Elections, 16 President & Vice President Elections besides Council Elections and bye- elections. 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.

Risk is an effect of uncertainty on objectives and is integral to any process. Depending on the planning, preparation and resources, risks 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, Election Planner, Online activity platform Encore, Online nomination facility, c-vigil, Election planning portal 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 to prepare a consolidated risk manual of electoral management. After detailed deliberations and examinations of existing best practices in the world in electoral risk management, the Group had prepared the Risk Manual, which not only consolidated all previous instructions and guidelines but also provided a composite manual from start to finish in an electoral cycle.

Again, the Commission constituted a committee on 17th February, 2023 under the Chairmanship of CEO, WB for Review, Updation, Modification and Modernization of this Manual. The Committee has furnished their final report on Manual of Risk Management through number of deliberations, meetings both online and physical interactions, within themselves and consultation with the experts. A few chapters such as risks in Presidential election, Risks from Natural Disasters and Pandemic have been added.

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 may 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 to any electoral risk that may have any potentiality to threaten the security of the process at any level.



Illustration 1 : Electoral cycle

Altogether 43 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 many 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. A number of risks are listed amongst these aspects of electoral management.

Some of these risks concern the statutory provisions of electoral management such as: flaws in nomination process, non-application of mind in scrutiny, Improper symbol

allotment, wrongful rejection of nomination paper, error in ballot paper printing including photo mismatch, Improper entry in ENCORE, Improper counting of VVPAT in VCB leading to mismatch with CU result 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.

A special emphasis is made towards handling media, since media in the present times is omnipresent and plays a significant role in perception management, it is necessary that electoral personnel remain conscious of the concerns highlighted by media persons in public domain and conduct themselves suitably and promptly respond as the situation demands and or/when required with due approval/consultation with competent authority.

The committee recommends to evaluate and priorities 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 and latest data and to evaluate risks is also recommended.

# CHAPTER 1

# INTRODUCTION

Risk Management in conduct of elections refers to the process of identifying, assessing and mitigating potential risks that could impact the conduct, integrity, security, or credibility of an election. It includes taking proactive measures to ensure that all aspects of election process are managed in a manner that eliminates the likelihood of any negative outcomes that could hamper the electoral process.

For more than seventy 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 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 makes it necessary for the Commission to implement measures to reduce risks in election management.

The Commission has always endeavored to bring in improvements in election management so that credibility of elections is maintained. Within the legal framework set by the 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 randomization software, vulnerability mapping of areas prone to inducement or election related violence, deployment of Central Armed Police Forces, Voter Awareness Programmes, Permission through online platform Suvidha, online nomination, Complaint disposal within 100 minutes in c-vigil, Absentee postal ballot voting etc. These measures instill 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 perceptive, ECI has been issuing instructions/ guidelines to deal with electoral risks for seven 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 documented procedures may not deliver hundred per cent result.

With this objective, an effort has been made to catalog possible risks that could be encountered in the process of conduct of elections in the present context and provide solutions.

# 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.

> The stages of Risk Management based on ISO 31000 as explained by ISO, UNI-DO & 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*
>
> Identifying, evaluating, treating and reviewing risks in cycles are the essence of risk management.

Risks can be categorized into controllable and uncontrollable risks. Risks that arise from factors under our control such as lack of training, poor procedures/processes, unplanned resources, failure to communicate, etc. can be prevented by addressing the lacunae and strictly adhering to instructions and SOPs laid down by ECI. The damage from risks that are uncontrollable such as a natural disaster (cloudburst/ floods, cyclone), outbreak and escalation of local/ communal conflict, Covid pandemic etc. can be prevented by proactively designing a mitigation strategy which shall entail clearly defined roles for everyone involved in the process.

The ISO 31000 (2018: 6–7) states in its risk management guidelines that: Top management and oversight bodies, where applicable, should demonstrate and articulate their continual commitment to risk management through a policy, a statement or other forms that clearly convey an organization's objectives and commitment to risk management.

There are different methodologies that can be adopted to manage risks. What is vital, however, is that the process adopted should provide a tailored and structured approach to understanding, communicating and managing risk in practice. The figure below explains the process involved in risk identification, assessment and risk treatment.
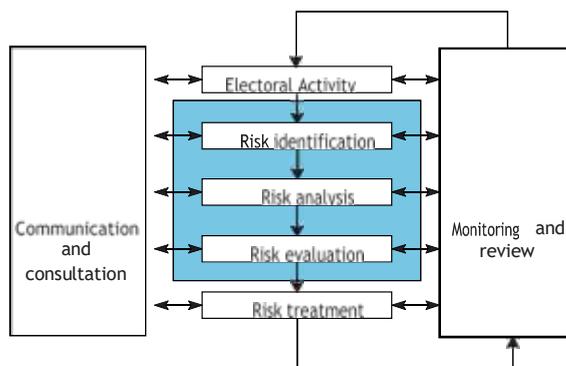
**Figure 1: Risk Assessment and Management Cycle**

## Step 1. Identify the risk (scope, context and criteria)

This step includes identification of the risk that may hamper the electoral activity. Identification in the external and internal context shall help in considering all the challenges that may be encountered while conducting elections. The context can be defined within Political, financial, social and cultural, technological, legal and regulatory environment.

## Step 2. Risk analysis

The risk analysis process seeks to establish the likelihood or probability of a risk occurring and the consequences or degree of impact on the elections if it does occur. The likelihood and the consequence of a risk combine to establish the overall level of risk. A risk list can be created to describe a range of possible likelihoods and consequences.

## Step 3. Risk evaluation

The purpose of risk evaluation is to support decisions. Risk evaluation involves comparing the results of the risk analysis with the established risk criteria to determine where additional action is required.

## Step 4. Risk treatment

This step involves developing further measures to reduce the level of risk to the organization if warranted based on an evaluation. Several options are available to treat risks, including avoiding the risk, reducing its likelihood or impact, or sharing the risk with a third party.

## Monitoring and review

Monitoring and reviewing risks will highlight environmental, strategic and other factors that vary over time and that could change or invalidate the risk assessment and therefore impact the level of treatment required, its interdependencies with other functions and activities and its relevance in the decision- making process.

## Communication and Consultation

Leveraging communication and consultation to mitigate an electoral risk is essential. Communication involves promoting an awareness and understanding of risk and consultation pertains to getting feedback and information from stakeholders which can help in identifying, analyzing, evaluating and treating the electoral risk.

## 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, 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 standardization of responses to the identified risks.

The Committee studied the application developed by IDEA, known as the ERMT (Electoral Risk Management Tool), to assist the fragile democracies in overcoming conflict situations primarily. Examples from USA, Australia, Kenya to address risks are mentioned in the manual (Annexure 2) to understand the tools developed by other countries for risk management.

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, Sugam, c- vigil, Know Your Candidate app, Encore, ETPBS and others has enhanced the transparency and effectiveness in electoral management.

To manage various risks, the election machinery may implement several strategies such as use of advanced technology, strict adherence to protocols and meticulous implementation of instructions, cyber security measures, combat misinformation and disinformation, training of polling parties and election staff on security and procedures, voter education campaigns to promote awareness and participation etc.

Effective risk management in elections is critical to maintaining public confidence in the democratic process so that the will of the people is reflected in the government that has been elected.

# CHAPTER 3

## RISKS IN INDIAN ELECTIONS

Managing risks in elections can be a challenging task due to the size and complexity of India coupled with the diverse cultural and social backgrounds of its citizens. Risks are spread across a broad spectrum and include security, technical, communication, political and operational risks among others. Managing risks requires careful planning, coordination, implementation and a comprehensive approach that covers various aspects of the electoral process.

The ECI plays a critical role in ensuring that the election process is transparent, fair and secure. ECI has published elaborate executive instructions and procedures for electoral fairness and transparency. There are several compendiums of instructions, handbooks, manuals, etc. for reference of the field machinery in the conduct of elections. Tools like Vulnerability Mapping, Check Lists, Critical Polling Stations, Assured Minimum Facilities, District Election Management Programme, Force Deployment Plan, Elections Planner, etc., have been developed to identify, assess, prioritize and intervene in the risks.

This chapter identifies risks associated in various timelines of elections indicated in the Electoral Cycle,

i.e. Pre-election Period, Election Period and the Post-Election Period. In each period, the common and probable risks are listed, the list though exhaustive, is not necessarily comprehensive, as new risks may arise and require additional risk management strategies to be developed and implemented.

# Risk Matrix in General Elections

## I. Pre-Election Period

**Institutional Framework**

\* at which the risk is to be addressed

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| 1.Strengthening of 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 Posting of Additional Officers like Additional CEO, Joint CEO, etc. sufficiently ahead of the polls. | The appropriate authorities should be suitably sensitized in this regard for filling of the posts well ahead of the elections. | CEO |
| | 1.3 Undesirable personnel | Those who are not dedicated enough for the public cause need to be replaced. ECI blacklists officials not to be re-engaged. | CEO |
| | 1.4 Shortage of staff, especially technical person like system analysts, programmers and Data Entry Operators, etc. | Necessary steps should be taken for filling up the requirement of staff, including technical staff. | CEO |
| | 1.5 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. | ECI |
| 2. Engagement of professional services for election management | 2.1 Non – specified tenure of agreement | Agreement with various agencies needs to be checked for a secured tenure. | ECI & CEOs |
| | 2.2 Non-existent performance indicators | Performance-based conditionalities to be put. | ECI &CEOs |
| | 2.3 Unprofessional agreement clauses | Individual clauses should be revisited and vetted for enhanced effectiveness. Non-disclosure agreement to be signed. | ECI & CEOs |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| 3. Office IT Infrastructure | 3.1. Dysfunctional communication channels. | Testing telephone lines, net connectivity and additional dedicated lines. Frequent dry run to be conducted. | 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. | ECI/ CEO |
| | 3.4. Excessive dependence on outside support for routine necessary activities such as Video conferencing. | Either mandating NIC to prioritize election-related video conference or asking State network to make a reliable video-conference facility. | CEO |
| | 3.5 Turnover of programmers at State/District levels | Qualification and tenure of individual key personnel to be prescribed. | ECI & CEOs |
| | 3.6 Ineffective communication of SLA and 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. | ECI & CEOs /DEO |
| 4. IT Apps/Portal | 4.1 Lack of training, capacity to take peak load, incorrect data entry | Sensitization, awareness, repeated training. Adhering to SOPs of ECI. Second level checks for final data entry. | CEO/ DEO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| 5. Posting of Election Officers | 5.1 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 |
| | 5.2 Fresh Notification of ROs/ AROs/ EROs/ AEROs | Before every election, fresh proposals in consultation with the State Government shall be sent for issuance of fresh notifications for easy reference and to avoid so many notifications issued from time to time after main notification in past. | CEO/ ECI |
| | 5.3 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. Preparation of personnel database months. Retiring within 6 | CEO |
| | 5.4 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 |

# PLANNING AND IMPLEMENTATION

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| 6. Adequate and timely financing | 6.1 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 |
| | 6.2 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 figures. | CEO |
| | 6.3 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 |
| | 6.4. Delayed submission of expenditure accounts/audit certificates, obstructing further releases. | Settling all pending accounts and audit issues as well as submitting timely estimates settling previous election accounts timely. | CEO |
| 7. EVM and VVPAT Security and Management | 7.1 Difficulties in 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 |
| | 7.2 Damages to EVMs in long transport. | Protocols to be followed to avoid damages. Moreover, proper briefing on handling of EVMs/VVPATs may be given to concerned. | CEO/ DEO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 7.3.Inadequate and un-safe storage of EVMs. | Dedicated warehouses to be built with required security features such as strong, robust doors, CCTV camera, etc. | CEO/ DEO |
| | 7.4 Thin margins of EVM and VVPAT reserves. | Adequate numbers to be supplied to have necessary reserves so that awareness and training EVMs/VVPATs need not be added in reserve at last moment. | ECI/ CEO |
| | 7.5Unused expirable items like VVPAT printing paper, power-pack, etc. | Centralised stock-keeping to track the unused consumables and transfer to the poll-going states. Following ECI's new norms for disposal of Battery of EVM and VVPAT as per guidelines. | ECI/ CEO/ DEO |
| | 7.6 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 technical support.<br>BEL and ECIL deployed trained engineers and a certificate is issued to engineer after training in supervision of ECI. Field official to allow only certified engineers. | CEO/DEO |
| | 7.7 Quality of thermal paper for VVPAT | As thermal paper has a definite life, it is crucial to ensure adequate supplies of fresh thermal paper as well as expiry date. | CEO/ DEO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 7.8 Scope of complaint in case of hasty FLC in absence of political parties / candidates. | At every stage of EVM/VVPAT preparation and randomization, it must be ensured that representatives of major political parties, 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 videographed. Monitoring through webcasting during FLC. In case stake holder are not participating, written reminders may be issued. Attendance register shall be maintained on daily basis. | RO/ DEO |
| | 7.9 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 to ensure only FLC OK machines are used for training awareness and demo etc. | DEO |
| | 7.10 Non-functioning of GPS tracking of machines | To be included in training module of Sector Officer. Dry run to be done on P-3 day | DEO / RO |
| | 7.11 Misplacing of SLU/P-FLCU during FLC | Ensuring separate room in FLC premises for storage under proper security. | DEO / RO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 7.12 Improper loading of symbol in VVPAT during commissioning | Checking the printed ballot slips with 7A by at least two teams meticulously. RO to certify proper symbol loading | DEO / RO |
| | 7.13 Non-implementation of correct machine replacement protocol | Emphasis in training on replacement protocol at Mock poll and during poll. Train the Sector Officer adequately | DEO / RO |
| | 7.14 VVPAT knob not kept vertical while in movement | Train all concerned in easily rememberable way. 'Like when to work we are to stand' means before working keep the knob vertical, else horizontal. | DEO / RO |
| | 7.15 Replace machines due to drainage/ non-functioning of battery | Train the Polling party on battery replacement protocol and keep extra battery available with Sector Officers | DEO / RO |
| | 7.16 Improper storage of ABCD category machines | Train the team about the different storage protocols of ABCD category of machines, inform candidates accordingly. | DEO / RO |
| | 7.17 Reserve machines are exhausted due to poor reserve management on poll day | Keep sufficient reserve machines. Follow new guidelines of pasting of stickers. Training and awareness machines can be introduced as reserve units after due procedure de novo FLC etc. | DEO / RO |
| | 7.18 Polling Personnel should not transport EVMs/VVPATs in any unauthorized vehicles, even if there is any breakdown. They should not stop with vehicles in any unauthorized place. | Suitable instructions to polling personnel should be given in this regard. Arrangement for reserve vehicles should be kept at different locations. The same may also be emphasized during training. | RO/ DEO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| 8.Material Procurement | 8.1 Doubtful efficacy of indelible ink. | Random sample-checks to be made more elaborate; quality-checking by NPL. Final payment may be linked to a complaint-free performance of ink. | ECI/ CEO/ DEO |
| | 8.2 Possibility of delay in supply of security seals. | Centralized procurement, depending on poll-schedules in various states. Moreover, LOI/ Procurement Order may be placed in advance as per ECI instructions. | ECI/ CEO/ DEO |
| | 8.3 Non-standard voting compartments. | Prescribed standards to be adhered to. | DEO/ CEO |
| | 8.4 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 |
| | 8.5 Probability of Shortfall/ Deficiencies | Assessment to be made on the basis of formulae/parameters prescribed/issued by ECI. Proper training for correct use. No use of old expired materials. | CEO/ DEO/ RO |
| 9.Legal readiness | 9.1 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/ CEO |
| | 9.2 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/ CEO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 9.3 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 |
| | 9.4 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 |
| 10. Pandemic/ Epidemic Risk | 10.1 Probability of violation of norms during FLC, Commissioning. Risk of becoming infected | Strict observation of norms. Keeping reserve team ready | DEO / RO |
| | 10.2 Improper assessment of home voting for infected electors. | Proper assessment including ballot for home voting | DEO / RO |
| | 10.3 Enhanced requirement of personnel. | Advanced computerized database preparation, Adequate training | DEO |
| | 10.4 Improper assessment of Polling Stations. | Proper assessment of enhanced Polling Stations | CEO/ DEO |
| | 10.5 Breach of Covid norms. Shortage of trainers | Strict observance of Covid norms More pool of master trainers. Inclusion of Covid module. | CEO /DEO / RO |
| | 10.6 Shortage of Police personnel. Cases of Covid infection | Plan for auxiliary, home voting etc. Set up protocol for handling Covid positive cases | CEO /DEO / RO |
| | 10.7 Flouting of Pandemic/Epidemic norms at booth by electors | More awareness programmes | RO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 10.8 Deviation of Pandemic norms at RC queues | Token system to be followed | RO / PrO |
| | 10.9. Hesitation of polling official for being members of team for Covid / Pandemic/ Epidemic Voting | Proper training | RO / PrO |
| | 10.10 Missing physical reconciliation meeting | Proper training for familiarization through hybrid mode. | DEO / RO |
| | 10.11 Less awareness generation, less turnout | Intensive 360-degree communication needed | CEO / DEO / RO |
| | 10.12 Less physical meetings with media due to Pandemic/ Epidemic | More informal transaction and use of online platform | CEO / DEO / RO |
| | 10.13 Not vaccinating all concerned and less space for distance maintenance | Advanced planning for vaccination. Increase hall, reduce counting table | DEO / RO |
| | 10.14 Less visibility to counting agents due to more distance in Pandemic/Epidemic | Arrangement of display | RO |
| | 10.15 Congestion at sealing process, storage | Proper space identification | RO |
| 11.Establishing polling stations | 11.1 Notifying buildings no more in use. | Field-verification of database to be done in consultation with concerned departments. | DEO/ RO |
| | 11.2 Notifying buildings likely to be demolished. | Maintenance of divisions of the owner departments to be contacted to avoid such structures. | DEO/ RO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 11.3 Delayed finalization of Nos. of booth. Housing of auxiliaries/ additional polling stations. Polling stations not on ground floor. | Finalization of booth as early as possible and making detailed planning. Polling stations to be on ground floor. | CEO / DEO |
| | 11.4 Ensuring AMF to newly created PS and temporary structures. Inadequate Fund | Framing long term plan and emergency plan Dovetailing of fund of all related department | DEO |
| | 11.5 No clear idea on parts of roll. Improper front page and division of roll for auxiliary booths. | Awareness to political parties, electors and poll officials | DEO / RO |
| | 11.6 Faulty assessment of requirement considering all users. Delay in procurement No proper planning for Bagging and storage | Assessment of requirement to be done considering all users. Procurement process to be started well ahead. Place for bagging, manpower, storage to be pre-Planned | CEO/ DEO |
| | 11.7 Lack of scope of personal interaction for familiarizing new app | Online platforms must be used effectively. | CEO / DEO |
| | 11.8 More communication through online mode. Lack of trained personnel to handle | Dedicated trained team and development of portal | CEO /DEO / RO |
| | 11.9 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 |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 11.10 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 |
| | 11.11. 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. Latest AMF guidelines of the Commission to be followed and ensured. | DEO/ RO |
| | 11.12 Connectivity of Polling Stations, Remoteness or any natural barriers/obstructions in reaching to them | All possible means need to be deployed to ensure that every polling station is in some way connected. Use of conveniently located building. In case of severely remote locations, alternative ways such as deploying HAM Radio operators, Satellite phones, police wireless coverage, etc. to be explored | DEO/ RO |
| | 11.13. Appropriate awareness of any new booth created/ auxiliary voting arrangement | Proper awareness to be made to electors /candidates/political parties about the voting arrangement in newly created booth and auxiliary Booth | DEO/ RO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 11.14. Conversion of P-3 Polling Stations into P-2 | CEO/DEO to explore alternative Polling station to minimize P-3 into P-2 PSs | DEO/ CEO |
| | 11.15. For hassle free polling experience, all Polling stations shall be on ground Floor | Such Polling stations shall be explored before election for voters especially PwDs/Senior citizens | DEO/ CEO |
| 12.Poll- schedule announcement | 12.1 State-specific festivals, religious holidays, exam schedule may get left out. | Care to be taken while communicating the calendar of examinations, festivals, holidays etc. to the Commission. | ECI/CEO |
| | 12.2 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 |
| | 12.3 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 get translated into the state language also. | CEO |
| 13.Vulnerability mapping and security plan | 13.1 'Law and order' based inputs may not be sufficient to secure a clean poll. | Analyse poll-related past incidents and emphasize on intelligent examination of voting statistics, electoral registration, public grievance, present-day rivalry, etc. along with 'law and order' inputs. | DEO/ RO/ SP |
| | 13.2 Incomplete analysis to decide the degree of sensitivity may lead to gaps in election- management for a clean poll. | Inputs must be obtained from various sources to decide on vulnerability mapping. Worry list to be collected from all candidates. | DEO/ RO/ SP |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 13.3 Delayed proceedings in preventive cases do not result in binding over of the potential trouble-makers. | About six months before the probable announcement of election-schedule, all pending police cases in respect of preventive proceedings should be reviewed by the SP. Potential troublemakers should be proceeded against in a time-bound manner, so that around the time of campaigning, all such anti-social elements are bound over or kept in preventive custody. | DEO/SP |
| | 13.4 Unrealistic demand for CAPF conveys dependence on central forces for ensuring orderly polls. | 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 | ECI/ CEO SPN O/ DEO /SP |
| | 13.4 A - Deployment plan prepared in an ad hoc manner without taking into consideration ground realities on the basis of last general election | The process of identifying possible risks, assessing their potential impact, developing and implementing plans to minimize the negative effects of changes are a part of risk management exercise. Deployment plan must consider potential problems. This requires an acute sense of understanding of local realities. | CEO/ DEO/ SP/ OBS. |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 13.4 B. Lack of fore-sight in planning for resources can lead to a difficult situation. | Both the State and District level administrative machinery should take up this work in a much-focused manner and ensure sufficient reserve in all resources, including equipment, transport, manpower, etc. The state and the district must select the right personnel for the right jobs in the deployment plan for desired result. | DEO/ SP |
| | 13.4C. Inflexible deployment plan. Resistance to change in such can make the plan ineffective. | Scope of tweaking of deployment plan even at the last minute, if a situation develops and warrants it. | DEO/ SP |
| | 13.4D. Prioritization of deployment of specific type of forces, if not done on the basis of ground realities, Resistance to change in such a case will only make the plan ineffective, | The state and the district must look at the basket of forces available and prioritize based on district level, AC level and PS level requirements. | CEO/ DEO/ SP/ OBS |
| | 13.4E. Improper implementation of force deployment. | The consequences of not implementing the plan must be made very clear to all levels. The plan shall be communicated and personnel well trained. The fact that all election functionaries including security personnel are under the disciplinary control of the ECI during elections, must be brought to the notice of all personnel. | CEO/ DEO/ SP/ OBS |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 13.4F. Security risk | Maintenance of a risk profile incorporating the outcome of risk assessment, vulnerability analyses, DEMP (District Election Management Plan) and other relevant input. The districts are already categorized in the national vulnerability atlas based on hazard potential, maintained by Govt. of India. Also, most of the districts have district gazetteers indicating the previous sensitivities, which need to be supplemented by the electoral events.<br>The Commission's instructions lay down the methods of collection of previous incidents that may have a bearing on the security management during elections. All such input needs to be collated in a scientific format for better analyses, easy retrieval | CEO/ DEO/ SP. |
| | 13.4G. Transportation | Efficient use of transport including by train and effective route planning ensures that last minute challenges and risks are mitigated. It is necessary not only to plan but also have fallback measures. Skilled drivers with good quality vehicles shall be put on duty especially hilly terrain for safety. | CEO/ SPNO/ DEO/SP |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 13.4H. Accommodation | Advance identification of accommodation for incoming forces for their comfortable stay as per prevailing weather conditions. Good quality food shall be served on time. A Nodal officer shall be appointed for overall coordination. | SPNO/ DEO/SP |
| | 13.5 Preparation of deployment plan in an ad hoc manner without taking into consideration ground realities and emphasis on CAPF may result in underutilization of state's resources such as Home Guards, NCC, Civil defence etc. | Proper utilization of State/UT forces. NCC cadets can be utilized for maintaining queues and providing booth- level assistance to the females, senior citizens and physically challenged electors. | ECI/ CEO/ DEO |
| | 13.6 Underutilization of non- force measures such as videography, web- casting may result in spreading the security forces too wide for effective supervision of sensitive locations. | Videography of voters in queue and people gathered outside, real- time webcasting 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 difficult and sensitive areas. | ECI/ CEO/ DEO/ SP |
| | 13.7 Constituency-wise and District-wise deployment may get influenced by political factors. | 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 joint Committee consisting of CEO, SPNO, CAPF Coordinator and State CAPF coordinator. | CEO/ DEO |

# ELECTORAL ROLL

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| 14. Continuous updating of Electoral Rolls | 14.1 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 for obviating bias. | ERO/ DEO |
| | 14.2 Bulk submission of registration forms by BLAs. | System to restrict bulk feeding of Form-6. Guidelines of the Commission to be followed. | ERO/ DEO / CEO |
| | 14.3 Approval of Form-6 without due checking. | Abnormal additions part-wise to be scrutinized for anomalies. | ERO/ DEO |
| | 14.4 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 |
| | 14.5 Unauthorized approvals at the subordinate levels. | Frequent changes of passwords or biometric identification system should be kept in place. | ERO/ DEO |
| | 14.6 Delay in deciding forms cause submission of repeated forms. | Time-bound disposal of forms to be insisted. Daily review of pendency of forms. Special care to be taken to decide on forms received through NVSP portal & other online platforms. | DEO/ CEO/ IIIDEM |
| | 14.7 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 |
| | 14.8 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 reported by the system automatically to the higher level. | DEO / ERO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 14.9 Acknowledgement of Form-6 not given to applicants, thereby preventing tracking of pending applications. | Generation of specific acknowledgement numbers to be made compulsory, by which processing of forms can be tracked by the applicants. | ERO/ CEO/ DEO |
| | 14.9A Inadequate response from the eligible youth for the facility of 4 qualifying dates | Focused SVEEP activities for prospective electors have to be taken. Awareness regarding e EPIC downloading facility to be intensified. Encouraging mobile no linking for better electoral Services | CEO/ DEO |
| | 14.10 Wrong modifications by electors of other electors' details. | Any modification in internet mode to be made password- protected so that no one is able to modify other electors' details. | ECI/ CEO |
| | 14.11 Delay and confusion in delivery of EPIC. | Part-wise segregation of EPICs should be made after approval of registration. Under no circumstances should EPICs be distributed by political representatives. Ensuring timely Free delivery of EPIC through registered post | ERO / DEO |
| | 14.12 Not maintaining print copies of registration forms. | Numbered forms to be maintained and action must be first completed on the printed form, before approving or rejecting on the ERONET. 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. | ERO / DEO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 14.13 Missing certain segments like marginalised persons, women, youth, disadvantaged and poor people, tribals in remote areas, transgenders, ex- servicemen, etc. | 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. Encouraging online registration through ECI Applications like NVSP, Voter portal, Voter helpline app. | ERO / DEO |
| 15. Security of Electoral Roll Database | 15.1 Huge data of citizens in an easily downloadable format compromise on data security as well as privacy. | Robust system-controls should be put in place to secure electoral roll data from unauthorized use by various interest groups. | ECI/ CEO |
| | 15.2 Machine-driven programmes can download entire database by unauthorized data- analysis for motivated misuse or mischief. | View-alone formatting can be done, disallowing free downloads and completely disabling running of programmes on downloaded database. Non-editable and Image pdf to be uploaded as per ECI guidelines. | ECI/ CEO |
| | 15.3 Free soft copies to political parties subject to data-processing and categorizing electors for political gains. | Only print copies may be given to political parties; soft copies of electoral rolls should be 'view only' type. | ECI/ CEO |
| | 15.4 Sharing of electoral data with other agencies such as SEC or government depts. May allow unauthorized copying or transfer of data. | 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, Aadhar numbers, etc. must never be displayed or shared with any other agency. | |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | | 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. | ECI/ CEO |
| | 15.5 Misuse of electoral data for private or commercial purposes. | Misuse of electoral data without authentication from the competent authority may be considered to be madean 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 permission should be made mandatory. | ECI/ CEO /DEO |
| | 15.6 Outsourced programmers and operators or printing vendors may compromise data security. | SLA personnel and other outsourced operators must be bound by proper agreements to protect electoral data from any unauthorized use. Non-disclosure agreement to be signed. | ECI/ CEO /DEO |
| | 15.7. Inadequate Disaster Recovery Systems. | A detailed security audit of both software and hardware must be done at least 6 months before the likely announcement of general elections. ECI guidelines must be followed in respect of electoral data security, cyber-control, adequate capacity of back-up systems, etc.Annual Maintenance Contracts must be 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. | ECI/ CEO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 15.8 Excessive stress on technical manpower may lead to errors and breakdown. | Regular review of pendency, timely disposal of forms and advanced supply of necessary hardware will ensure that there is no undue stress on the technical team working on electoral roll management systems. Multiple shift arrangement of manpower to be made during peak period. | CEO/ DEO / ERO |
| 16. Fidelity of Electoral Roll | 16.1 Non-inclusion of eligible persons. | Adequate outreach programmes to be conducted. Appropriate SVEEP & implementation of 4 qualifying dates in a year effectively. | ERO/ DEO /CEO |
| | 16.1A. No family tagging | Before draft publication of electoral roll, members of a family shall be clubbed so that on day of poll, all family members cast vote in the same polling station. | ERO |
| | 16.2 Inadvertent deletions. | Deletion lists to be published, shared and acommunicated wherever feasible. Proper monitoring and adherence to SOPs to avoid inadvertent deletions. | ERO/ DEO/ CEO/ ECI |
| | 16.2A. Inadvertent deletions of important electors such as renowned art personalities, political representatives, senior public servants, judicial officers, etc. | EROs to keep close watch to ensure non removal of such important voters. | ERO/ DEO/ CEO |
| | 16.3 Deliberate exclusion of certain sections and areas. | Appropriate publicity and efficient grievance- redressal system. | ECI/ CEO/ DEO/ ERO |
| | 16.4. Possibility of motivated deletions. | Abnormal deletions, section -wise and part-wise, to be scrutinized for anomalies. | ERO/ DEO/ CEO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 16.5 Inclusion of ineligible electors. | Cross-verification, random checks and complaint-monitoring systems to be established. | ERO/ DEO/ CEO |
| | 16.6 Repeated entries. | Scrupulous adherence to de-duplicating checks to be ensured. Monitoring through generation of DSE, PSE and EPIC list. | ERO/ DEO/ CEO |
| | 16.7. Double registration in bordering constituencies. | Electoral rolls of bordering constituencies to be compared; special communication drives to avoid double registration. | CEO/ DEO/ ERO |
| 17. Efficiency and motivation of registration staff like BLOs and Data Entry Operators | 17.1 Untrained and uninspired staff ommitting mistakes in Forms, insufficient documents taken, not giving acknowledgements, blank fields. | Adequate training to be given for avoiding errors and mistakes, appropriate levels of supervision. Inadequate knowledge of the new forms as a risk because of which wrong forms may be filled for various services | DEO/ CEO/ ERO |
| | 17.2 Delegating without authority for bulk submission of forms. | Proper identification- cards/badges to be issued to BLOs and Data Entry Operators. Taking declaration of BLA's authenticating bulk form submission as per ECI guidelines. | DEO/ ERO/ CEO |
| | 17.3 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. Monitoring by supervisory officials through super- checking mechanism in ERONET | ERO/ CEO/ DEO |
| | 17.4 Delay in submission of field- inputs giving scope for repeated Form-6. | Time-lines to be set and checked. Alert generation through SMS and colour coded monitoring is entailed. | ERO/ CEO/ DEO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| 18. Ensuring fundamentals of eligibility– citizenship, age and ordinary residence | 18.1 Possibility of inclusion of foreign nationals. | The importance of unambiguous clarity on citizenship requirements to be communicated to EROs. Referring to appropriate authorities and adhering to guidelines for determination of doubtful citizenship. | ERO/ DEO/ CEO |
| | 18.2 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 as per appropriate guidelines. | ERO/ DEO/ CEO |
| | 18.3 Registration of under- age persons. | Birth documents to be checked in case of young applicants. | ERO |
| | 18.4 Carelessness in Non-residents registration. | 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 |
| 19. Digital security of electoral registration | 19.1 Misuse of digital signature by ex-staff. | Immediate surrender of digital signature and change of password on change of data entry operators. | ERO/ DEO/ CEO |
| | 19.2 Bulk submission by misusing digital signature. | Programmed system controls | ERO/ DEO/ CEO |
| | 19.3 Unauthorized 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. Signing non-disclosure agreement with the agency involved. CCTV arrangement in data entry locations. | ERO/ DEO/ CEO |

## PERSONNEL MANAGEMENT

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| 20.Drafting and Requisition | 20.1 Not finding adequate numbers of polling personnel, particularly female polling staff. | 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 polldeployment. 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. Online database may be prepared for efficient deployment. Senior personnel should not be placed under junior personnel. | CEO/ DEO |
| | 20.2 Deployment of staff not fit for strenuous jobs. | It is 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. | DEO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 20.3 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/ RO |
| 21. Training and Education | 21.1 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. 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. Hands-on training for filling up of various forms. Evaluation component at the end of training. | CEO/ DEO/RO |
| | 21.2 Inadequate hands - on training on EVMs and VVPATs | Presiding Officer and polling / counting staff must be given hands-on training on handling EVMs and VVPATs. | DEO |

## II. ELECTION PERIOD

## ELECTORAL CAMPAIGN

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| 22. Public places defacement & publicity | 22.1 Defacement of government /public private property | Concerned authorities should be sensitized during poll preparedness regarding commission's policy related to defacement of properties and deletion of all references on politicians/ministers on the official website during election period. | CEO/DEO/ RO |
| | 22.2 Advertisements in print media, some surrogate and some under the name of some organizations | In the case of advertisements, the source of which is traceable, the following action to be taken: If the advertisement is with the consent or knowledge of the candidate, it will be treated to have been authorized by the candidates concerned and will be accounted for in the election expenses account of the candidates If the advertisement is not with the authority from the candidate, then action to be taken for prosecution of the publisher for violation of section 171 H of IPC(incurring expenditure in advertisement without written authority from the candidate concerned. | ECI/CEO/ Central/ State Governments /RO/ DEO |
| | 22.3 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 |
| | 22.4 Running adver-tisements, up to the day of announce-ment of polls. | Government department should publish advertisements well before election - announcements. | ECI/CEO/ Central/ State Governments/ RO/DEO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 22.5 Monopoly of a particular political party for advertisements at places | To communicate all concerned authorities to follow equitable distribution policy on political advertisement among all players. | CEO/ DEO/RO |
| 23. Code of Conduct in letter and spirit | 23.1 Motivated releases of funds or announcements of schemes on the day of poll-announcement. | Committee constituted by the Commission in the state to be consulted in cases of ambiguity. Within 72 hours of announcement of elections, the CEO/DEO shall obtain the list of works which have already been started on ground and list of fresh works which have not started on ground for reference in case of validating any complaint on violation of MCC | ECI/CEO/ Central/State Government/ RO/ DEO |
| | 23.2 . Presence of political functionaries /party workers/ procession functionaries/ campaign functionaries etc. who are not voters of the constituency in the constituency after the campaign period is over. | Election administration/police to: Check marriage halls/ community halls etc. where such people are kept. Verify lodges and guesthouses to keep a track of the list of occupants. Set up check posts in the constituency borders and track the vehicular movement from outside the constituency. Verify the identity of the people/ group of people in order to find out whether they are voters or not and establish their identity. | RO/DEO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
|  | 23.3 Misuse of the vehicles provided by the State Government to non-official functionaries viz. Chairman, dy. Chairman, President, Vice President, commissioners etc. of various autonomous organizations during electioneering. | Functionaries of all the autonomous organizations to be instructed to use the official vehicles only for commuting between office and residence and to attend any official meeting within the headquarters itself. The district administration to be advised to keep strict vigil on the movement of such vehicles. | CEO/ central/ State Government/ RO/DEO |
|  | 23.4 MCC violation by leader specified under section 77(1) (star campaigners) | All DEOs and ROs to be directed that wherever a case of MCC or related violation by star campaigner in their respective constituency observed, the same shall immediately be brought to the notice of the CEO for taking appropriate guidance/approval. The CEO shall report the action taken to the commission for immediate follow up action. | CEO/RO/ DEO |
| 24.Media Communication | 24.1 Gaps in Communication cause uncertainty, confusion and rumors. | Regular media briefings to be done by CEO or the next senior most officer till the polls are over. Training to be organized for media personnel at all levels. Media persons having authority letters are to be allowed entry into polling stations and counting centres. | CEO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 24.2 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 |
| | 24.3 Strict mainte-nance of confidenti-ality | Confidentiality of force deployment is ensured for the purposes of safety of the forces and the general sensitivity. Nobody other than the Commission or the CEO is authorized to talk to media on this matter as per ECI instructions. | CEO/ DEO/ OBS |
| | 24.4 Unconfirmed information about seizures or police cases may be inter-preted as bias. | Every individual report of seizure or violation of code of conduct must be verified through the Returning Officer, with a report of the concerned Police/Income Tax authority, before sharing with media. | RO/DEO |
| | 24.5 Unattended media reports con-vey 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 |
| | 24.6 Possibility of motivated reporting or sponsored news items. | All mass media reporting to be monitored for any possible cases of paid or distorted news. Paid news, Fake news have to be monitored. Misinformation, malinformation and disinformation issues to be monitored. Rebuttal has to be issued in case of incorrect news Reports | DEO/ CEO/ MCMC |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 24.7 Casual comments on Media engagement | All election officials must show restraint in media interaction | CEO/ DEOs/ ROs/ Observers |
| | 24.8 Media engagement Dispute regarding entry and videography | Media persons with authority letters can be allowed to enter the polling stations and counting hall by the returning officer after verification of their authority letters. However, they will be allowed inside the counting hall in very small numbers and in batches and the actual numbers will be determined taking into account the size of the counting hall, space available and other relevant factors. Authority letters issued will be subject to the conditions imposed by the Commission as are mentioned in the authority letters, like media persons not being allowed to go near the voting compartment, photographers not to take photographs/films which may violate secrecy, etc. Any violation of such conditions will automatically invalidate the authority letter and will also invite penal action. | |
| 25. Social Media | 25.1.Malinformation, misinformation, disinformation and Fake news in social media | An SOP to take down violations on social media platforms under voluntary code of ethics is shared by ECI to CEOs before elections for quick response. | RO/DEO/ CEO/ECI |
| 26.Poll Processes: Nomination, Scrutiny, Withdrawal and Symbol allotment | 26.1 Incorrect Notification about designation of RO may lead to legal complications. | It must be doubly checked that the designation of the Returning Officer in all notifications and notices is the same as notified by the Election Commission in the State Gazette. | CEO/DEO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 26.2 Hasty receipt of nomination papers and documents may lead to avoidable rejections later. | Every single nomination and accompanying documents should be checked at the time of submission and deficiencies if noticed should be communicated to the candidate/ proposer in writing, mentioning specific time and date before which the said defect must be got rectified to the satisfaction of the RO. To prevent cases of non-SC/ ST persons contesting election from reserved constituencies, RO must insist to produce SC/ ST certificate issued by the competent authorities. Reminder in format C3 should be given to the persons having criminal antecedents and filing nominations. | RO |
| | 26.3 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. RO's chamber should have sufficient space to perform the functions of nomination, staggered time shall be allotted to perspective candidates in advance. | DEO/RO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 26.4 Frivolous complaints about non-receipt of forms, though claiming to be within time. | The watch for public view in RO's office should be 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 |
| | 26.5 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. | ECI/RO |
| | 26.6 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. | ECI/RO |
| | 26.7 Apparent consultation at scrutiny time may lead to avoidable complaints. | Under no circumstances should the RO be in telephonic consultation during the scrutiny. | ECI/RO |
| | 26.8 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 |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 26.9 Wrongful rejection of a nomination can become a valid ground for setting aside the whole election. | After doing adequate security and analysis, in case of any doubt, the guiding principle should be to give the benefit of doubt to the candidate, as wrongful rejection can certainly become a ground for challenging the election. Encouraging optional online submission of affidavit with adequate safeguards. Returning officers must be aware of the correct legal position about the impact of stay order of the appellant court on execution of sentence passed by the trial court for the purpose of disqualification of the persons. | RO/ ECI |
| | 26.10 Old copies of symbol books may lead to mistakes in allotment. | 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. | RO |
| | 26.11 Unauthorised or wrong form A&B, especially from unrecognized political parties may lead to complaints and litigation. | At the time of receiving nominations, 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. Care must be taken in cases where a candidate files nomination as candidate set up by more than one political party and both/all such parties to send forms A and B in his/her favour. | RO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 26.12 Frivolous complaints of not getting a symbol of one's choice may lead to litigation by non-serious candidates. | 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. | RO |
| | 26.13 Non-standard photograph may delay printing of ballot papers. | Even at the time of symbol allotment, any non- standard photographs, if already detected, should be correctly replaced by the candidate.<br>To avoid complaints later, the photo to be used in ballot paper should be obtained in writing by the candidate.<br>Name and signature can be taken behind a spare copy of the photograph that can be kept in nomination file for future references. | RO |
| | 26.14 Mis-match of photographs of candidates. | 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 compared with the original nomination papers so as to prevent any mismatch. | RO / DEO / CEO |
| | 26.15 unexpected large number of candidates | Necessary arrangement of additional BUs and other arrangement to be preplanned. | CEO/ DEO/ RO |
| | 26.16. Publication of Criminal antecedent | The candidate and political parties have to publish the criminal antecedent according to the three schedule/tranches prescribed which should be monitored. | CEO/ RO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 26.17 Incorrect up-loading of affidavit on website: upload-ing of aadhar copy | While uploading the affidavit or counter affidavit on the website, ensure that copies of other documents such as aadhar card etc. are not uploaded on the website. (CEO/RO) | |
| 27. Printing and security of Ballot Papers | 27.1. Defective printing with mis-spelt names, blurred photograph, incor-rect sequence, etc may lead to com-plaints and even be a ground for election petition. | The list of Contesting Candidates (Form 7-A) must be personally scrutinized by the Returning Officer and cross-checked with the particulars given in the nomination form. | RO/ CEO |
| | 27.2. Unaccounted ballot papers may be subject to mischief. | All cancelled or defective ballot papers should be destroyed under proper supervision. All final ballot papers should be counted physically by election-staff from RO office and dispatched with proper security. | RO |
| 28. E-Postal ballot (Voting operations and electoral duty) | 28.1 Faulty prepara-tion of Postal Ballot Paper | Adequate Training must be imparted. All safety protocols must be followed. | RO/DEO / CEO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| 29. Postal ballot | 29.1 Faulty printing and assessment of postal ballot | Must take all precautions as listed in the ECI's instructions. RO should assess his/her requirement of postal ballot papers keeping in view the number of polling personnel to be drafted on election duty and number of voters likely to be requisitioned and the number of police personnel. Before the PB is issued, the facsimile signature of the RO should be stamped on the reverse side of the PB two times, one which will appear in full and other in such a manner that part of signature appears on the reverse side of postal ballot paper and the remaining part appears on the reverse of counterfoil of the ballot paper. | RO |
| | 29.2 Mistake in distribution of postal ballot; inadequate reach to the election duty staff including security personnel | 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. Risks associated with absentee postal ballot to be factored A data base of persons to be issued postal ballots on account of being on election duty should be prepared well in advance. Ensure that among the police personnel, only those who will be engaged in election related duties on the day of poll shall only be eligible for obtaining PB. Hence obtain the list of such police personnel well in advance. | RO/DEO /CEO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
|  | 29.3 Timely issuing of PB | RO should ensure that all PB are issued within the time. No ballot paper can be issued after the stage of preparing marked copy of electoral roll for supply to the presiding officers for conduct of poll. (RO) |  |
|  | 29.4 Lapse in sending PB to special voters | In case of special voter, RO should deliver or cause them to be delivered the PB and forms personally. (RO) |  |
|  | 29.5 Information to political parties and candidates | All recognized political parties should be informed in writing about date, time and place of voting through PB at the facilitation centre and receiving of polled PB by the post office. (RO/DEO) |  |
| 30. Absentee Postal Ballot Voting (Home voting for AVPD, AVSC, AVCO) | 30.1. Houses missed by BLO during application form distribution | Ensuring BLOs visit all houses and distribute the application forms to targeted electors | CEO/RO |
|  | 30.2. Miscommunication on benchmark disability certificate to electors | Good IEC (Information, Education, Communication) activity for Elector and the stake holders for obviating miscommunication | CEO/RO |
|  | 30.3. Secrecy violated during voting at home | Adequate training to polling party | CEO/RO |
|  | 30.4.Improper storage of polled ballots | Setting up of strong room as per protocol and communicating the same to candidates | CEO/RO |
|  | 30.5. Candidate's representatives not intimated | The candidates must be intimated with the route chart along with home voting schedule | CEO/RO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
|  | 30.6 Unawareness of the guidelines to the team of poll of-ficers | Ensure that the team of poll officers is well aware about the Commission's guidelines like attestation of form 13A by the poll officer. (RO) |  |
| 31. Level – Playing field in campaign period | 31.1 Distribution of cash and goods vitiates the level-playing field and raises doubts about the efficiency of the election manage-ment authorities. | Adequate number of checkposts, 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. C-vigil to be implemented effectively. Adequate number of teams to be formed for prompt grievance redressal. | CEO/DEO/ SP/RO |
|  | 31.2 Delayed re-sponse to complaints affects the morale of law-abiding citizens. | Timings of receiving complaint and reaching the spot should both be mentioned. Daily analysis of response-time should be done 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, abouts. | CEO/DEO/ SP/RO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 31.3 Effective co-ordination amongst Enforcement agencies. | The CEO should hold coordination meetings 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 support of local police authorities in their efforts of search, seizure and raids. A separate meeting with DGCA authorities should be done to maintain fool-proof vigilance on suspected traffic through air. Effective and regular coordination at CEO level in this regard. | CEO |
| | 31.4 Inadequate coordination with neighbouring states may allow inter-state movement of illegalcash, liquor or goods. | A meeting just after the announcement of election schedule and another when the campaign-period starts should be held with neighbouring states to have effective coordination on state borders. A spirit of reciprocating pro-activeness can induce the neighbouring state authorities to work for a common purpose | CEO/ DEO |
| | 31.5 Ignoring coastal security can be a cause of concern. | A separate meeting with Coast Guard and State Police should be organized. Suspected landing points for contraband goods should be kept under surveillance. | CEO/ DEO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 31.6 International land borders can be a source of infiltration for disrupting poll- process. | DEOs of districts having international borders should hold one-to-one coordination meeting with concerned commanding officers of guarding force. | DEO/SP |
| | 31.7. Undeposited firearms can be a source of trouble. | ECI instructions on deposit of licensed arms must be followed. | CEO/DEO/ SP |
| | 31.8 Illegal firearms can cause violence to intimidate voters. | Search and seizure operations for illegal firearms must be continued throughout the election period. Police cases should be booked and quick investigation should be done to build confidence among law- abiding citizens. Instead of just having a target-based approach on depositing legal arms, special attention needs to be given for search and seizure of illegal/unlicensed arms. | DEO/SP |
| | 31.9. Compartmentalized checking at department check posts. | The check posts of Forest Department check for illegal forest produce, or the Commercial Tax Department for unaccounted goods during the election period, should be re-oriented to function as integrated units of MCC enforcements, apart from doing their respective jobs. As far as feasible, CCTVs should be installed at such check posts to improve efficiency. | RO/DEO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 31.10 Target-approach on execution of warrants should not be allowed to miss the cases of grave nature. | Careful analysis should be done of pending warrants so that the limited time and resource are utilized on cases of public order and electoral malpractices. | RO/DEO/SP |
| | 31.11 Political influence in providing state security of gunmen may cause intimidation or undue influence among electors. | 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. | RO/DEO |
| 32. Compliant Management | 32.1 No or inadequate redressal of complaints | Effective complaint monitoring system, Awareness on C-vigil and other helplines. | CEO/ RO |
| | 32.2 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 |
| | 32.3 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 |
| 33. Conducting free, fair and peaceful polls | 33.1. Check-posts get abandoned on the eve of poll, allowing unrestricted movement of prohibited items. | As far as feasible, some CAPF units should be continued to man check posts on the night prior to poll. If logistically manageable, security personnel guarding overnight may be allowed to rest the next day and report before closure of poll to relieve the poll-duty personnel. SST and VST to be strengthened further. | CEO/DEO/SP |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 33.2. Election machinery's focus being on Polling Stations, the vulnerable areas do not get adequate protection during the day and night prior to poll. | A basic minimum enforcement of vulnerable areas, border points and crucial check-posts should be continued, as the last 24 hours are the most vital for the purpose of minimizing illegal influences on electors. | CEO/DEO/SP |
| | 33.3 Last night contacts by party functionaries allows scope for | All contesting candidates and their agents should be video-trailed in their last day of campaign. Prohibitory orders may be imposed by Magistrates in areas – where possibility of mob-violence or threatening the weaker sections exists. | CEO/DEO/SP |
| | 33.4 Unattended serious complaints may raise doubts over integrity of poll-process. | 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. | CEO/DEO/ RO/Observer |
| | 33.5 Inadequate protection of EVMs and poll-material in case PrO does not stay overnight. | Stay of PO and other essential staff should be ensured on the night before poll-day. Proper security shall be ensured. | DEO/RO |
| | 33.6 Non-functioning electrical connection, watersupply, etc. at polling stations. | 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. Latest AMF guideline to be ensured and followed. All Polling Station must be inground floor. | DEO/RO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 33.7 Non-deletion of mock- poll votes may result in all votes becoming in-valid and vitiate the atmosphere. | Along with mock poll conduct report, mock poll data deletion report must be collected from every polling station. Communication channel to be kept clear to avoid miscommunication. Sector Officer shall ensure while visiting to assigned polling stations. | RO/DEO/ Observer |
| | 33.8 Agents of less powerful candidates may either be absent or discouraged from continuous presence. | 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. | DEO/RO |
| | 33.9 Non-func-tioning of EVMs/ VVPATs during the poll. | Reserve EVMs/VVPATs to be kept with mobile supervisory units, for quick replacement of EVMs/VVPATs. Deployed engineers to be positioned at various convenient locations and contact number of Engineers and Sector officer to be exchanged mutually on P-1 day for effective coordination. | RO/ DEO |
| | 33.10 Overwhelm-ing numbers in late hours of poll may disrupt poll process through booth- jam-ming. | 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. | PO/RO/ DEO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 33.11 Booth-capturing with apparent force. | Last hours of polls should be monitored continuously. POs should be trained to report any incident of violence immediately. | PO/RO/DEO |
| | 33.12 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 |
| | 33.13 Casual challenge of test vote to be discouraged | Presiding Officer to follow detailed guideline under 49MA. | PO |
| | 33.14 Voter identification- Mismatch between English/ Vernacular versions ofelectoral roll (Alphabetical roll) | Adequate training on acquaintance of structure of Roll and its entries is to be given to polling parties. | DEO/RO/PO |
| | 33.15. Machines found in unauthorized place/ vehicle | The machines should not be carried in vehicle other than assigned vehicle. Machines should not be kept in place other than designated location. Precautionary training required. Machines to be moved through GPS tracked vehicle. | DEO/RO/PO |

## RESULT DECLARATION

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| 34. Counting Hall | 34.1 Failing to notify the details of counting time and place as per Conduct of Election Rules 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 |
| | 34.2 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 |
| | 34.3 No inspection of the counting hall. | Mandatory inspection by the RO, much before the due dates. | RO |
| 35. Security of Counting Hall | 35.1 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/SP |
| 36. Strong Room | 36.1 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 |
| | 36.2 Inadequate space for VVPATs | Wherever VVPATs are being used, strong rooms should have adequate space for VMs along with VVPATs. | DEO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| 37. Counting Personnel | 37.1 Limited focus on Counting Personnel requirements | Adequate preparation for the database and updation. | DEO/RO |
| | 37.2 Limited availability of Micro Counting Observers | Advance preparation to be made to identify and train Micro Observers as per ECI guidelines. | DEO/ RO |
| | 37.3 Poor Training of Counting Personnel | Scheduled training with focus on hands on session well in advance | IIIDEM/ DEO/ RO |
| 38. Counting Hall management | 38.1 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 |
| | 38.2 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 |
| | 38.3 No attention to detail on seating arrangement, electricity, Connectivity. | Alternative arrangement to deal with power failure is a must. Computer-systems must always be protected from power failure. | RO/DEO |
| | 38.4 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 |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| 39. Postal Ballot Counting | 39.1 Absence of focus on PB | RO and Observer must keep a close watch. | RO/ Observer |
| | 39.2 Incorrect and wrongful rejection | All rejected PB must be checked by the RO. Where the margin of victory is less than the number of postal ballot papers rejected as invalid at the time of counting, all the rejected PBs papers shall be mandatorily re-verified by the RO before declaration of result. | RO |
| | 39.3 Inordinate Delay in PB counting | Arrangements should be made, as per guidelines to complete postal ballot counting in consonance with the EVM counting. If there is in ordinate delay in postal ballot counting and it continues even after the EVM counting is completed, it can cast aspersions. | RO |
| 40.Result Declaration | 40.1 Precaution to be taken 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 |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| | 40.2. 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 |
| | 40.3 Improper entry in Encore | Before making it to public it must be checked at meticulously by senior officials | RO |

## III. POST ELECTION PERIOD

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| 41. Sealing of Strong Rooms | 41.1 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. The A+B category machines must be stored separately AC wise after counting. It must not be stored in educational institution. | ROs/ Observers |
| | 41.2 Aspersion on storage of polled machines | Daily inspection by DEO and RO of strong room is at HQ, 3-4 times by DEO and daily by RO if strong room is outside headquartered. | RO/DEO |
| 42.Election Petition | 42.1 Non-Communication of filed EPs | CEO Must establish contact with the Registrar of High Court and monitor the progress of EPs, keeping the ECI informed. | CEO |
| | 42.2 Lack of awareness on the nuances of Election petitions and guidelines. For example, storage of EVM's without AC/AS segregation. | The election officials in the district and the CEO Office should be adequately trained with respect of Election Petitions. | CEO/ DEO |
| | 42.3 Lack of clarity on EVM Petition | CEO to periodically monitor the petitions where any direction to keep the EVMs are issued. Ensure filing of an application for EPs to relase EVMs where EVM is not the subject matter. | CEO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level * |
|---|---|---|---|
| 43.Election Expenditure returns | 43.1 Delay in sending expenditure report in ECI format. | DEOs and ROs must ensure that as per ECI guidelines, all expenditure returns are sent to ECI well in time. | RO/DEO/ CEO/ECI |
| | 43.2 Unexplained and unresolved discrepancies in expenditure figures. | Wherever differences expenditure there in figures are the 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. Reconciliation meeting shall be organized timely after polling. | DEO/ CEO/ECI |
| | 43.3 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. Original acknowledgement shall be sent to ECI. | RO/DEO/ CEO/ECI |

# CHAPTER – 4

# RISKS RELATED TO RAJYA SABHA AND LEGISLATIVE COUNCIL ELECTIONS

## I. Elections to Council of States (Rajya Sabha)

| Work area | Risk Identified | Mitigation Measures / Action Points | Level |
|---|---|---|---|
| 1. 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 |
| 2 Electoral college | The RO maintains the up-to-date Electoral College for elections to Council of States as per Section 152 of RP Act, 1951. However, there is no freezing date for the same, unlike that for Assembly and Council Constituencies (See Sections 23 & 27 of RP Act 1950). This leads to last minute changes in the electoral college due to reasons such as disqualification of MLAs (either by Court orders or by the Speaker) just before poll, as noticed in the past. | The RO must coordinate with the Assembly secretariat to ascertain up to date status of electors such as whether an elector has been disqualified or a disqualified elector has been reinstated. | RO |
| 3. Ministers as Election Agents. | Since a Minister or a sitting MLA may also be made an agent, such strong political functionaries may exercise undue influence and even pressurize 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/RO |

| Work area | Risk Identified | Mitigation Measures / Action Points | Level |
|---|---|---|---|
| 4. Acceptance/ Rejection of ballot papers | Lack of clarity in respect of provisions for acceptance/ rejection of ballot papers based on marking of preferences. The decision to accept/reject the ballot paper is left solely to the discretion of the RO. However, it has been observed in the past that wrongly rejected ballot papers by RO resulted in recounting of votes and the election result being challenged through Election Petitions. | To avoid such challenges, it is suggested that a proper SOP be made for accepting/ rejecting of marked ballot papers and the same may be displayed at all prominent places in the counting centres. | ECI/RO |
| 5. Marking of preferences on ballot paper | Lack of awareness among the electors regarding proper manner of marking preferences may lead to rejection of ballot papers. | It is suggested that a poster containing clear instructions on how to vote with multiple illustrations be prepared and displayed at the polling stations, as done during presidential and vice-presidential elections. | ECI/RO |
| 6. 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 |

| Work area | Risk Identified | Mitigation Measures / Action Points | Level |
|---|---|---|---|
| 7. Voting by Illiterate/ Blind Infirm Voters | As per rule 40A of the Conduct of Election Rules, 1961, the presiding officer(Returning officer), If he/she is so satisfied, shall allow an illiterate/ infirm/blind elector to have a companion. However, as the decision is left to the RO's discretion, it renders the process vulnerable to allegations. | For illiterate voters, literacy status be checked from the records of perspective assembly secretariats For blind/infirm voters, medical certificate be insisted upon before allowing the facility of having a companion. | RO |
| 8. Violation of Secrecy of Vote | Elections to the Council of States are conducted by Open Ballot System as per Section 59 of the RP Act, 1951 and Rule 39AA of the CoE Rules, 1961. As per this system, an MLA who belong to a political party shall show his/her marked ballot paper to the authorized representative of his/her party (and no one else) before inserting it into the ballot box. However, there have been instances where the elector shows the ballot paper to another person intentionally, causing his/her vote to be declared invalid. This affects the quota and in turn, the result of the election and is a violation of Secrecy of Vote (Rule 70 of the CoE Rules, 1961). | It is suggested that a dedicated polling officer be appointed to see that the ballot paper is shown only to the concerned authorized representative. | ECI |

## II. Elections to the Legislative Councils

### (Graduate/Teachers/Local bodies)

| Work area | Risk Identified | Mitigation Measures / Action Points | Level |
|---|---|---|---|
| 1. Electoral college | The RO maintains the up-to-date Electoral College for elections to Council of States as per Section 152 of RP Act, 1951. However, there is no freezing date for the same, unlike that for Assembly and Council Constituencies (See Sections 23 & 27 of RP Act 1950).<br><br>This leads to last minute changes in the electoral college due to reasons such as disqualification of MLAs (either by Court orders or by the Speaker) just before poll, as noticed in the past. | The RO must coordinate with the Assembly secretariat to ascertain up to date status of electors such as whether an elector has been disqualified or a disqualified elector has been reinstated. | RO |
| 2. 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 |
| 3. Companion for illiterate voter | Lack of clarity on how to decide literacy status may lead to seeking companion without justification. | The literacy status must be decided much before the actual date of poll to avoid unambiguity. | ECI / RO |

| Work area | Risk Identified | Mitigation Measures / Action Points | Level |
|---|---|---|---|
| 4. Companion for blind infirm | Absence of guidelines on deciding blindness/ infirmity may also lead to allegation when left to subjective assessment of Presiding Officer. | A clear procedure needs to be prescribed, with emphasis on a medical certificate in cases of visual challenge or infirmity. | ECI |
| 5.Unauthorized handling of ballot papers | Scope of taking ballot papers out of polling stations and / or inserting spurious ballot papers in the ballot box. 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. | 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. | ECI |
| 6. Vitiating voting by 'Tasmanian dodge'. | 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. | 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. | RO |
| 7. Secrecy of ballot | By way of electronic camera, photo of the marked preference may be taken by electors. | No electronic equipment should be allowed to be taken inside the polling station by electors. | RO |

| Work area | Risk Identified | Mitigation Measures / Action Points | Level |
|---|---|---|---|
| 8. Marking of preferences on ballot paper | Lack of awareness among the electors regarding proper manner of marking preferences may lead to rejection of ballot papers. | Lack of awareness among the electors regarding proper manner of marking preferences may lead to rejection of ballot papers. It is suggested that a poster containing clear instructions on how to vote with multiple illustrations be prepared and displayed at the polling stations, as done during presidential and vice-presidential elections. | ECI/RO |
| 9. Misplacing/ Replacing of marking instruments | The possibility of using an unauthorized instrument for marking needs to be precluded.\n\nSuch instances have been noticed in the past such as during Rajya Sabha elections in Haryana, 2016. | It must be ensured that the concerned polling officer gives the elector the authorized instrument for voting and takes it back without fail. Moreover, frisking of electors be done to ensure no unauthorized instrument is carried into the polling booth. | RO |

## III. Elections to the Legislative Councils (Councils constituencies)

| Work area | Risk Identified | Mitigation Measures / Action Points | Level |
|---|---|---|---|
| 1. Marking of preferences on ballot paper | There is lack of awareness among the electors regarding proper manner of marking preferences. This leads to large number of ballot papers being rejected, as observed in recent elections from Graduates' & Teachers' Constituencies. | It is suggested that a poster containing clear instructions on how to vote(with multiple illustrations) be prepared and displayed at the polling stations, as done during Presidential and Vice-Presidential Elections. | ECI/ RO |
| 2. Acceptance/ Rejection of Ballot papers | There is lack of clarity in respect of provisions for acceptance/ rejection of ballot papers based on marking of preferences. The decision to accept/ reject the ballot paper is left solely to the discretion of the RO. However, it has been observed in the past that wrongly rejection of marked ballot papers by RO resulted in recounting of votes and the election result being challenged through Election Petitions. | To avoid such challenges, it is suggested that a proper SOP be made for accepting/rejecting of marked ballot papers and the same may be displayed at all prominent places in the counting centre. | ECI/ RO |
| 3. Misplacing/ Replacing Of marking instruments. | The possibility of using an unauthorized instrument for marking needs to be precluded. Such instances have been noticed in the past such as during Rajya Sabha Elections in Haryana in 2016. | It must be ensured that the concerned Polling Officer gives the elector the authorized instrument for voting and takes it back without fail. Moreover, frisking of electors be done to ensure no unauthorized instrument is carried into the polling booth. | RO |

# CHAPTER 5

# RISKS IN PROCESS OF CONDUCT OF PRESIDENTIAL ELECTIONS

According to Article 54 of the Constitution of India, the President is elected by the members of the Electoral College consisting of:

(I)   elected members of both Houses of Parliament and

(II)  elected members of the Legislative Assemblies of all States including National Capital Territory of Delhi and the Union Territory of Puducherry.

Places of polling are generally Lok Sabha, Rajya Sabha, State/ UT Assemblies. Secretary General, Lok Sabha and Rajya Sabha alternatively become the Returning Officer. The Secretaries of Assembly of State/UT become the ARO and Presiding Officers.

The Chief Electoral Officer of each State including NCT of Delhi and UT of Puducherry supervises and coordinates with the Assistant Returning Officer for the conduct of poll at the respective State Legislative Assembly and transportation of the ballot boxes and other important election materials from the Election Commission to the respective State Legislative Assemblies and back to New Delhi, after the poll. To ensure a free and fair election, the Commission also appoints senior Officers of the Government of India as its Observers at the place(s) of polling. Some risks involved with this election can be avoided through meticulous planning keeping in mind the risks associated with every facet of activities involved.

### Risks associated with Elections to President of India

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level at which action to be taken |
|---|---|---|---|
| 1.Preparation of Electoral college | The MPs opting for state Assembly as Polling place are not marked properly or authenticated. MLAs opting Polling places other than their Assemblies. | While receiving the list of electoral college, verify then strike through names. Authenticate and match count accordingly. | ECI/RO |
| 2.Electors under preventive detention | Their names may be missing and they may not get opportunity to cast vote | List of such electors to be prepared meticulously. If court allows, they may cast vote at voting place. PB may also be arranged. | ECI/RO/CEO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level at which action to be taken |
|---|---|---|---|
| 3. Training | The officials like ARO, polling officers are not confident to conduct the election. The MP/MLAs are unaware of marking process. | Training of officials like ARO, Polling Officer have to be done by CEO. The electors have to be briefed about the poll process and the method of marking on Ballot paper. The polling representatives of candidates have to be trained well. Besides coordination meetings with concerned Departments have to be held. | CEO/RO/ARO |
| 4. Various Gazette notifications | Mistakes in Gazette notifications/Republication on appointment of RO/ARO, Presiding officer, Place of poll Schedule, List of contesting candidates etc. | Notifications have to be checked; counter checked before publication to obviate any mistakes. | RO/ARO/ CEO |
| 5.Communication | Missing/delayed communication channels | Camp bag facility to be Dedicated email ID operation and its tracking regularly. | RO/ARO/ CEO |
| 6. Ballot Printing | Specifications are not met up. Nos. are permanently pasted by black strip. | The black strip is to be of prescribed dimension and should not be gummed fully on both the sides. | RO/ARO/ CEO |
| 7. Materials procurement | Missing materials while collecting | Ballot box, Wooden box, respective keys, Pen, Posters, Stamp, Ballots & badges to be collected as assigned. | RO |
| 8. Operation of Ballot box | Not opening/closing correctly | Before receiving it has to be checked | ARO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level at which action to be taken |
|---|---|---|---|
| 9. Strongroom arrangement | Aspersion may be created on storage of ballots. | CCTV, Video camera, logbook, deployment of round the clock security to be made. Polling representatives of candidates to be present during opening/ closing/ sealing of strong room. | RO/ARO |
| 10. Coordination with Airport, CRPF | Inadequate coordination, delayed dispatch of materials, non communication of travel plan | Good coordination to be maintained to avoid any untoward incident. Seat to be booked in the name of Mr. Ballot box, ensuring necessary arrangement in flight in J class. | ECI / RO/ CEO |
| 11. Secrecy maintenance | Violation of secrecy. | As this process is different from Rajya Sabha election, necessary awareness to be generated. Further, if secrecy violated, due process to be followed. | RO/ARO/ CEO |
| 12. Marking on Ballot | Wrong marking, leading to rejection of ballot | Awareness on preference marking guidelines. Preference 1 must be marked. | RO/ARO/ CEO |
| 13. Pen dried/ink over smeared | Due to wrong storage, it may dry or ink may smear on pen itself. | Checking of pen before giving to electors. Mop up with clothes, etc. if pen is smeared with ink. | RO/ARO/ CEO |
| 14. Presence of Agent | Absence in crucial activity may lead to aspersion | ID card to be issued. Ensuring their presence in all activities and videography accordingly | RO/ARO/ CEO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level at which action to be taken |
|-----------|-----------------|-------------------------------------|------------------------------------|
| 15. Insertion of Ballot paper in ballot box | Candidate departed without inserting ballot in box | Close monitoring to be done to avoid such incident | RO/ARO/ CEO |
| 16. Videography | Missing to record important event | Videographer to be briefed on the issues to be covered. Poll day uninterrupted videography, hence backup videographer to be engaged All back up data to be submitted in sealed condition. | RO/ARO/ CEO |
| 17. Media Management | Dispute regarding entry and videography | Only media with authorisation letter of ECI to be allowed. To be escorted in group by I&CA personnel upto a certain distance and only to take still photography of polling hall without violation of secrecy. They shall only use long and mid- long shots and should not use any zooming techniques to focus particularly when a voter is marking his vote on the ballot paper | RO/ARO/ CEO |
| 18. Report return | Missing inspection report and poll day reports | A control room with reporting arrangement and pre-filled formats to be kept ready near place of polling. | RO/ARO/ CEO |

| Work area | Risk Identified | Mitigation Measures/ Action Points | Level at which action to be taken |
|---|---|---|---|
| 19. Polling booth arrangement | Improper setting up of place of Polling | Sketch map of place of polling detailing strong room, waiting place, Place for CEO, Observer, Voting compartment placing, seating of Polling Officers, PrO, Placing of Ballot box to be prepared. Carrying of Mobile to be checked, hence Arrangement for keeping of mobile should be made. | RO/ARO/ CEO |
| 20.Arrangement for Observer | Lack of co-ordination with Observer | Accommodation of Observer, Preparation of information booklet for him, Room for Observer near place of voting with reporting arrangement to be made. | RO/ARO/ CEO |
| 21. Pandemic/ Epidemic risk | Issues related to non-adherence to precautions for pandemic/ Epidemic | Arrangement to be made as per existing guidelines. Arrangement of covid voting at last hour, if prescribed. | RO/ARO/ CEO |

# CHAPTER 6

# RISKS EMANATING FROM NATURAL DISASTERS AND PANDEMIC/EPIDEMIC

Disasters and pandemics/Epidemics can become an impediment in the smooth conduct of elections. Natural disasters can emanate from floods, cyclones, landslides etc. The mitigation strategies differ for different types of natural disasters. The table below delineates some common points for mitigation of disasters emanating from natural disasters and pandemics/Epidemics.

**Table: Disaster risk and its mitigation**

| Work area | Risk Identified | Mitigation Measures / Action Points | Level at which action to be taken |
|---|---|---|---|
| 1. Election Disaster Management Plan | Not covering all facets of various types of disasters | Advance planning required for ensuring this. Frequent, timely meeting of SDMA and district disaster management authority | SDMA/ CEO/ DDMA |
| 2. Training | Untrained personnel do not know how to face disaster and panic. | Training of election officials on particular disaster handling in disaster prone areas should be provided. | CEO/ DEO/ RO |
| 3. Awareness of disaster | The election personnel are unaware of the updates / happening of disaster. | Live weather updates to be integrated with communication plan, provision for putting alert and mechanism of SOS generation should be there. | DEO/ RO /PO |
| 4. Poll Materials | The election materials becoming damaged/drenched due to water. | Procurement/use of polythene bags in rain prone areas for covering election materials | DEO/RO |

| Work area | Risk Identified | Mitigation Measures / Action Points | Level at which action to be taken |
|---|---|---|---|
| 5. Communication | Normal communication fails due to load shedding, mobile connection non- functional | Back up communication plan to be kept ready in case mobile becomes non- functional. Sufficient Power Banks to be provided to polling parties Allow mobile to all polling personnel, not only to Presiding Officer | DEO/RO |
| 6. DCRC | DCRC temporary structure blown away due to cyclone/Natural disaster | Avoid temporary structures of DCRC in cyclone prone areas | DEO/RO |
| 7. Polling station | Polling stations of lower areas become merged under water due to flood | Pre-identification of alternative building on highland for shifting of Polling station in case of sudden flood | CEO/RO/ ARO |
| | Load-shedding at PS after evening, the poll materials may be misplaced/ lost. | Arrangement of alternate/ rechargeable light or other source of light. | DEO/RO |
| 8. Polling parties | The Polling parties are frightened and unaware of alternate routes | Civil Defence volunteer / local volunteer with polling party in disaster prone areas | DEO/RO |
| | No electricity, no light endangers all the Personnel | Torch to be provided with PP | DEO/RO |
| | The polling personnel are drenched and infected with cold. | Rain coats may be stored at sector for special requirements in such disaster-prone areas, if any | DEO/RO |

| Work area | Risk Identified | Mitigation Measures / Action Points | Level at which action to be taken |
|---|---|---|---|
| | Due to being marooned / confined in non- navigable areas, the PPs are in short supply/ devoid of food | Provision of dry foods with polling parties in disaster-prone areas | DEO/RO |
| 9. Sector Team | The sector teams are not trained/skilled to tackle the situation. | NDM volunteer/ local trained volunteer to be engaged with each sector | DEO/ RO/SO |
| 10.Transportation | Shortage of fuel in affected area due to blockage in supply chain | Storage of fuel for vehicle / boat and mobile recharging system to be prearranged | DEO/RO |
| | No land transport possible | Timely arrangement of boats in flood prone areas | DEO/RO |
| | The road may become blocked due to land slide | Alternate route identification and probable reserve vehicle arrangements for landslide prone areas. Break down van to be placed in suitable locations. Helicopter facility to be pre- arranged | DEO/RO |

## Table: Risks Involved in Pandemic/Epidemic

| Activities | Risk | Management | Level |
|---|---|---|---|
| 1. Polling station | Delayed finalization of Nos. of booth. Housing of auxiliaries/ additional polling stations. PS to not on ground floor. | Finalization of booth as early as possible and making detailed planning. Polling stations to be on ground floor. | CEO/DEO |
| 2.AMF | Ensuring AMF to newly created PS and temporary structures Inadequate Fund | Framing long term plan and emergency plan. Dovetailing of fund of all related deptt | DEO |
| 3. Electoral Roll | No clear idea on parts of roll Improper front page and division of roll for auxiliary booth | Awareness to political parties, electors and poll officials | DEO/RO |
| 4. Preparation of Voting machines | Probability of violation of norms during FLC, Commissioning Becoming infected | Strict observation of norms Making reserve team ready | DEO/RO |
| 5.Ballot Paper | Assessment of various catogories of ballot,varing feature,quantity | Proper Assitment including dallot for home voting. | DEO/RO |
| 6.Election personnel | Enhance requirement of personnel First time poll personnel | Advanced computerized database preparation Adequate training | DEO |
| 7. Election Materials | Improper assessment, Invalidated materials | Proper assessment including enhanced PS | CEO/DEO |

| Activities | Risk | Management | Level |
|---|---|---|---|
| 8. Covid / Pandemic/ Epidemic materials | Faulty assessment of requirement considering all users delay in procurement. No proper planning for Bagging and storage. | Assessment of requirement to be done considering all users Procurement process to be started well ahead. Place for bagging, manpower, storage to be pre- planned | CEO/ DEO |
| 9.Training | Breach of pandemic/epidemic Shortage of trainers | Strict observance of Covid norms More pool of master trainers Inclusion of Covid module | CEO/DEO/ RO |
| 10.Security arrangement | Shortage of Police personnel due to pandemic/epidemic infection. | Plan for auxiliary, home voting etc. Set up protocol for handling Covid positive cases | CEO/DEO /RO |
| 11.IT issues | Lack ofscope of personal interaction for familiarizing new app | Online platforms must be used effectively. | CEO/DEO |
| 12.Public grievances | More through on-line mode and lack of personnel to handle | Dedicated team and developing portal | CEO/DEO /RO |
| 13.Poll Day | Flouting of norms at booth by electors | More awareness programmes | RO |
| 14.Post poll activities | Deviation of pandemic/ epidemic norms at RC queues | Token system to be followed | RO/PrO |
| 15.Home voting | Violation of pandemic/ epidemic norms and hesitation of polling official for being members of team for Voting | Proper training | RO/PrO |
| 16.Expenditure Monitoring | No physical reconciliation meeting | Proper training for familiarization with such process to candidates | DEO/RO |

| Activities | Risk | Management | Level |
|---|---|---|---|
| 17.Awareness generation | Less awareness generation, less turnout | Intensive, 360-degree communication needed | CEO/DEO/ RO |
| 18.Media management | Less physical meetings with media due to pandemic/epidemic | More informal transaction and online platform | CEO/DEO/ RO |
| 19.Counting | Unvaccinated personnel and less space for distance maintenance | Advance planning for vaccination Increase Hall, reduce counting table | DEO/RO |
| 20.Result declaration | Less visibility to counting agents due to more distance | Arrangement of proper display | RO |
| 21.Post counting activities | Congestion at sealing process, storage | Proper space identification | RO |

# CHAPTER 7

# CONCLUSION & RECOMMENDATIONS

It is essential to continuously examine risks by way of identifying the risks and their causes, collecting relevant information and analyzing them for monitoring purposes 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 and risks involved in Presidential, Vice Presidential, Council of State and Legislative councils. 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. Pandemic/Epidemic Risks and Natural Disaster or Geographical Terrain related risks in elections have also been listed.

The Manual provides 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 KAP baseline surveys has brought in standardisation and the practice has been institutionalized. 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 materialization 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 prioritize actions, assessment of risks is also necessary.

From the examples 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 31000 & 27001. 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, elections in the country have been managed very effectively. But there is definite benefit if field machinery uses decision tools as well. 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.

The Election Commission of India recently completed 401th State Assembly election in Karnataka, 2023, 17 elections to the parliament and 16 Presidential and Vice-Presidential

Elections. Results are accepted election after election and the transition of power each time has been smoothly done. This is in stark comparison to what has been recently happening even in many developed countries. In the last 70 years India has stabilized its social-cultural-political-geographical, economic, linguistic issues peacefully and through dialogue mainly because of established democracy which is possible only because people trust election results. Besides, ECI regularly conducts joint meetings with poll gone states and poll going states for experience sharing to obviate the risks. ECI arranges lot of international workshop /seminars on these issues.

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.

- 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.

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 are taken from time to time 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.

<div align="right">**ANNEXURE - 1**</div>

## Working Group/Committee for Preparation/Updation of the Manual

A committee for review, updation, modification and modernization of Manual of Risk Management was constituted vide order no. 464/INST/2023/EPS Dated: 17th February, 2023 of Director, Election Commission of India as per the below composition: -

| Name & Designation of the Officer | Position |
|---|---|
| The Chief Electoral Officer, West Bengal | Chairman |
| The Chief Electoral Officer, Kerala | Member |
| The Chief Electoral Officer, Assam | Member |
| Ms. Deepali Masirkar, Director | Coordinator |
| Ms. Shubhra Saxena, Director | Member |
| Sh. Ashok Kumar, Director (IT) | Member |
| Sh. Sanjay Basu, Addl. CEO, West Bengal | Member |
| Sh. Ajay Kumar Verma, Secretary | Member |

The Committee went through the existing provisions contained in Manual of Risk Management (2017 edition) and subsequent instructions issued by the Commission. The Committee furnished their final draft of Manual of Risk Management, Proforma Annexure/Report through number of deliberations, meetings both online and physical interaction within themselves and consultation with the experts.

# ANNEXURE - 2

# COUNTRY EXPERIENCES

## IDEA in Electoral Risk Management

International IDEA's Electoral Risk Management Tool (ERM Tool) is designed to help building user's capacity to: understand electoral risks, analyze 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 |
|---|---|
| **The electoral legal framework** <br> Contested electoral law <br> Unfit electoral system <br> Inadequate electoral administrative rules <br> **Planning and preparation for the implementation of electoral activities** <br> Poor performance of the electoral management bodies <br> An inadequate system for the resolution of electoral conflicts <br> Inadequate operational planning <br> Inadequate funding, financing and budgeting Inadequate electoral security arrangements <br> **Training and information** <br> Poor training for electoral officials <br> Lack of training for political parties and media <br> Lack of training of security sector agencies A poor voter information campaign <br> **Registration** <br> Problematic voter registration <br> Problematic registration of political parties and candidates Problematic accreditation of domestic and international observers <br> **Electoral campaigning** <br> Unequal media access and favouritism Provocative use of media by political parties Provocative party rallying <br> Provocative and violent actions by political parties. <br> **Voting operations** <br> Insufficiency, destruction and loss of sensitive and non-sensitive materials <br> Lack of transparency of special and external voting Problematic election-day operations <br> Problematic ballot counting and result tallying <br> **Verification of election results** <br> Poor management of election results Poor management of the final round of electoral appeals <br> Rejection of election results | 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 |

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 ERM Tool 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.

**USHAHIDI** is an online platform available as a global public facility. The UCHAGUZI version is customized 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
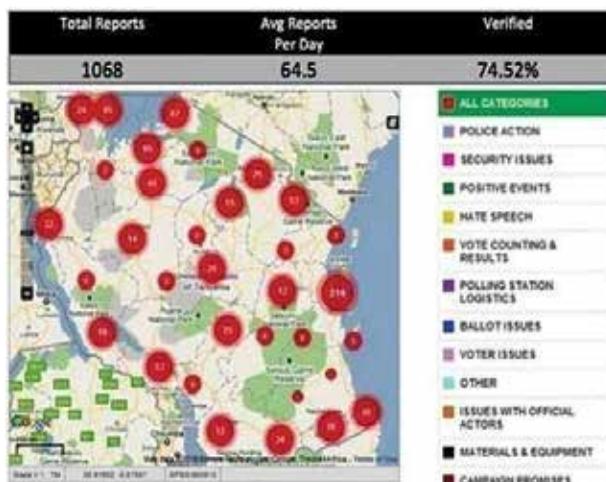


aggregate numbers. The platform is used by a number of civil society organizations to inform public or organizations responsible for conducting elections.

**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 color-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 organizations mandated to organize credible and peaceful elections, such as EMBs and Security Sector Agencies (SSAs), as well as other interested organizations. The tool is offered as a global public good since 2013.
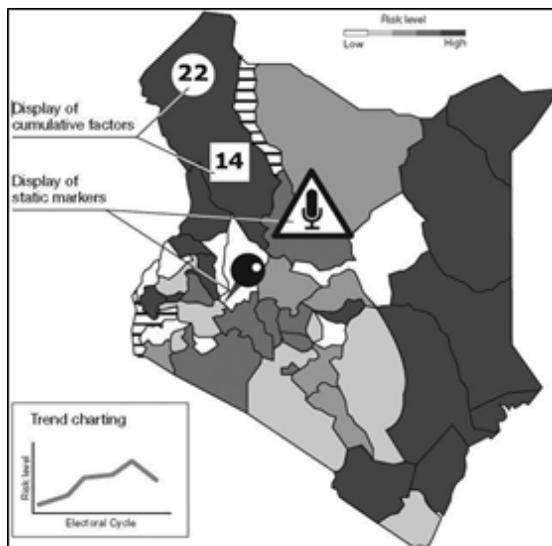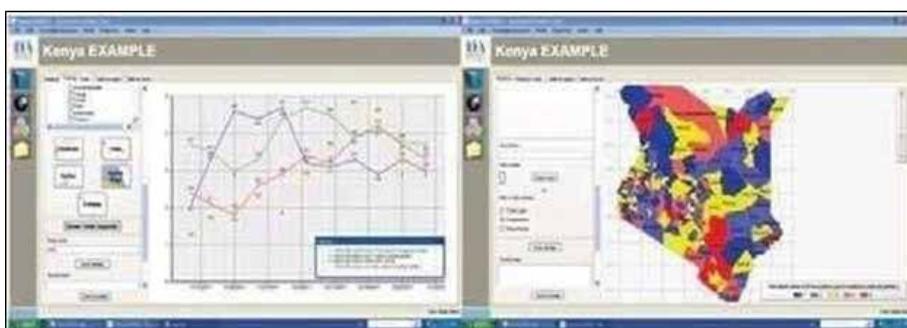
Figure above: Example of a color-coded map with static markers and cumulative factors, accompanied by a trend chart.

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

Geographical color-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 color. 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 color-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 color-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.

The Cybersecurity and Infrastructure Security Agency (CISA) National Risk Management Center (NRMC) prepared this risk assessment to support CISA efforts to help U.S. state and local governments to mitigate vulnerabilities to election systems and support cybersecurity and system resilience within election systems. This product provides base-level analysis election officials can use to prioritize and tailor risk management efforts to address specific vulnerabilities in high consequence election system components and to promote cybersecurity and system resilience within election systems.

Prioritizing mitigation of risk to potential cyber-attacks on the integrity of election system components could yield the greatest marginal benefit in improving states' risk profiles.

Based on these consequences, the assessment applied multiple criteria that assess the scale of cyber risk associated with election infrastructure. The potential scale of an election infrastructure cyber-attack is based on factors including whether the infrastructure is being prepared for use or is in use, whether infrastructure technology is networked and the degree to which infrastructure components are centralized. Risk criteria considerations are not mutually exclusive.

# POTENTIAL SCALE OF AN ELECTION CYBER ATTACK

# BY COMPONENT

| Election Component | Attack Factor | Scale |
|---|---|---|
| **Voter Registration** | Jurisdiction Registration Database | Medium |
| **Voter Registration** | State Registration Database | Heavy |
| **Pollbook** | State Pollbook Preparation | Heavy |
| **Ballot Preparation** | Jurisdiction Ballot Preparation | Medium |
| **Voting Machine** | Voting Machine Use | Low |
| **….** | …. | … |

**Australian Electoral Commission: risk matrix:** The assessment of a risk occurring (likelihood) or the impact of an event (consequence) can be subject to personal bias. For this reason, every step in the assessment requires communication and consultation. Risk Management best practice is that assessments are collaborative exercises best undertaken in a stakeholder risk workshop.

| RISK TOLERANCE | |
|---|---|
| CATEGORY | UPPER RISK THRESHOLD |
| Service, Delivery and Performance | Medium |
| Capability and Resources | Medium |
| Security | Medium |
| Compliance, Governance and Integrity | Low |
| Safety | Low |

| LIKELIHOOD RATING | | |
|---|---|---|
| DESCRIPTOR | QUALITATIVE | PROBABIL ITY |
| Almost Certain | It is almost certain that the event or described result will occur. | 91% and above |
| Likely | A strong possibility that the event or described result will occur. | 61-90% |
| Possible | The event or described result could occur. | 31-60% |
| Unlikely | It is unlikely that the event or described result will occur. | 5-30% |
| Rare | The event may occur but only in rare and exceptional circumstances. | Less than 5% |

## Elections Canada's Integrated Risk Register

**Key risks faced by electoral management bodies**: According to the AEC and International IDEA 2019–2020 survey, to which 43 EMBs responded, the most prominent risks faced by EMBs are outlined in the table below.

Respondents were asked to select and rank 5–10 risks that are most relevant to their context, with a ranking of 1 indicating the risk of being most relevant. The weighted average of the responses was then calculated using the formula $(x_1w_1+x_2w_2+x_3w_3…x_nw_n)/total$. A higher score indicates a risk being more relevant.
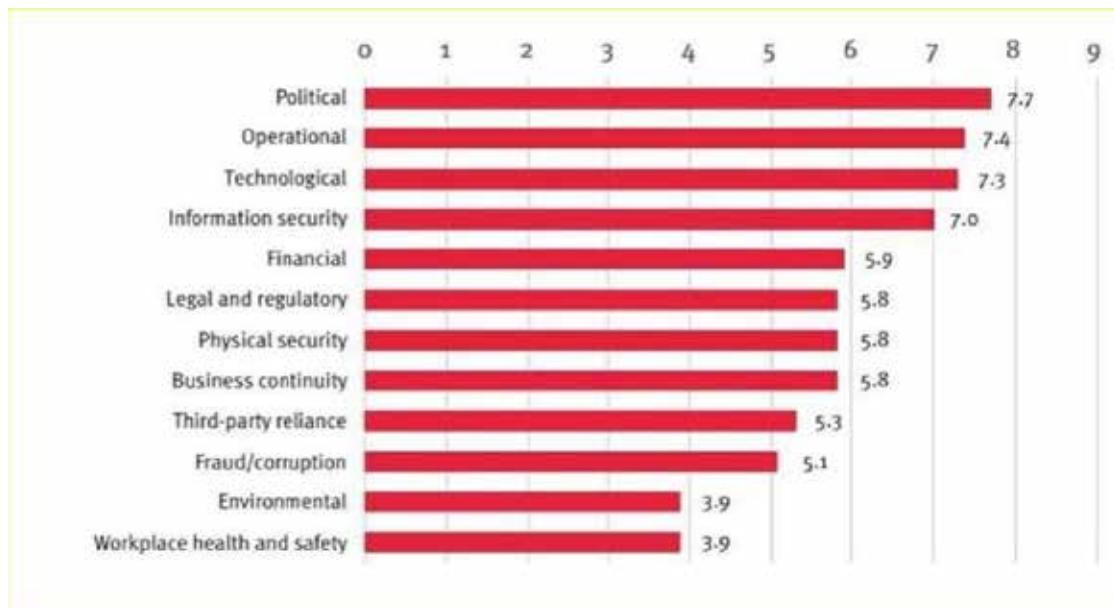


**Research done by School of Computer and Information Sciences, University of South Alabama USA proposed for 'Threat Trees'** for assessment of risk in Voting System. They said Security continues to be a critical issue in the safe operation of electronic voting machines. Risk assessment is the process of determining if a particular voting system is at risk and what steps can be taken to mitigate the risk.

They propose an iterative risk assessment process using threat trees. This process involves using a voting system risk taxonomy to categorize a threat, a schema to express logical hypothesis about a threat, generating a threat tree through functional decomposition, expressing threat instance semantics as nodal properties with metrics, validating the threat instance through independent representations and finally pruning the tree for enhanced usability and understandability. This process provides guidance to an analyst in using threat trees to conduct risk assessment of electronic voting systems. Because this process is based on abstract and extendable structures, it facilitates the comparison and validation of independent risk evaluations. Prospective voting system risk assessment metrics are provided.
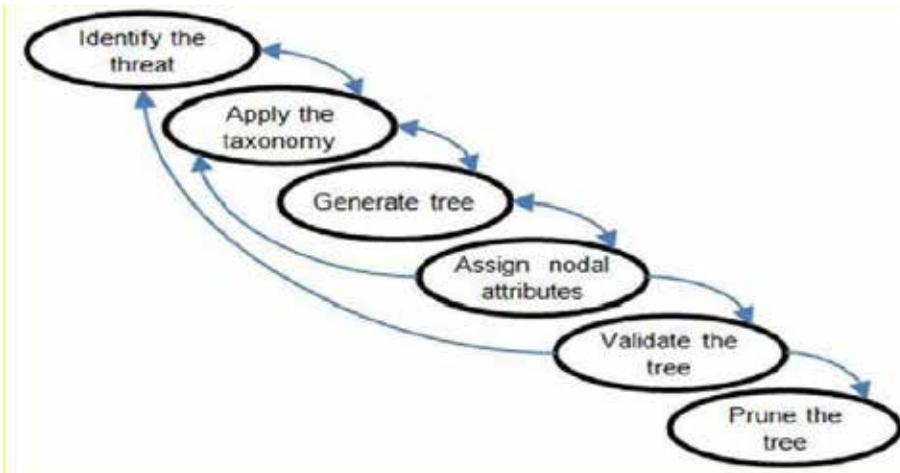
**Risk Assessment Process**.
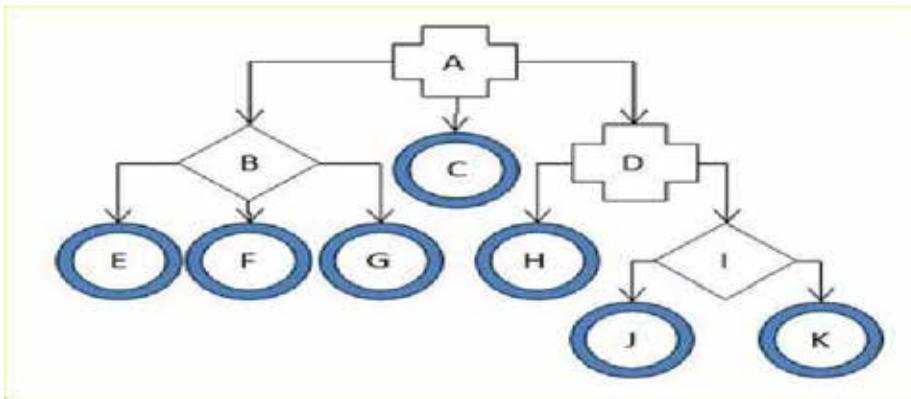


For these purposes, a threat defines the process that one or more attackers might take to accomplish a malicious act in an election. The "tree" is a powerful abstraction that graphically captures relationships among nodes that are hierarchically connected by directional edges, while allowing analysts to express individual node properties as nodal attributes. The tree structure allows a systematic approach to threat analysis, including facilitating abstraction and decomposition and allows analysts to categorize goals and steps so they can focus on those that are most critical.

For threat trees to be most useful, node names must capture the node's core function, whether the node is a goal or a step. Short, succinct names allow the analyst to recognize the collective meaning of the tree based on node type, name and connectivity.

In this paper, they propose a voting system that leverages trees. (1) Descriptively name nodes as threat goals and steps (2) Graphically express logical relationships between nodes and (3) Define attack goal and step semantic properties as nodal attributes. Collectively these three characteristics allow the abstraction and precision that are necessary to reason comparatively about fundamentally different threats.