
ELECTORAL ROLLS, PROCESS AND ARTICLE 326

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ABSTRACT

A representative democracy is built on the integrity of election records. Only until electoral records fairly represent the eligible voting population can India's constitutional provision of adult suffrage under Article 326 have any significance. The Special Intensive Revision (SIR), a thorough verification process designed to remove duplicate, deceased, shifted, or otherwise ineligible entries while facilitating the inclusion of eligible citizens, is one of the periodic electoral roll revisions carried out by the Election Commission of India (ECI) in order to preserve this integrity. Significant constitutional and political discussion on striking a compromise between electoral integrity and the constitutional principle of universal adult suffrage has been sparked by the recent implementation of the Special Intensive Revision in Bihar.

The need for documentary evidence, the exclusion of Aadhaar and Ration Cards as proof of citizenship, and claims that strict verification requirements may disproportionately affect migrant workers, economically disadvantaged groups, and other vulnerable groups have been the main points of contention. The Election Commission has simultaneously defended the exercise as a legitimate statutory duty carried out to maintain the integrity of electoral rolls and guarantee that only persons eligible under Article 326 continue to be enrolled.

The constitutional, statutory, and judicial framework controlling electoral roll updating in India is examined critically in this essay. It looks at how the Representation of the People Act of 1950, the Registration of Electors Rules of 1960, and Articles 324, 325, and 326 of the Constitution relate to each other. By analyzing current events, court rulings, and conflicting constitutional principles, the article assesses the Special Intensive Revision's constitutionality in more detail. It contends that accessibility, transparency, and procedural safeguards must continue to be crucial in order to prevent administrative verification from unintentionally impeding the constitutional promise of universal adult suffrage, even though periodic revision of electoral rolls is essential for preserving electoral integrity.

Keywords: Electoral Rolls, Special Intensive Revision, Article 326, Adult Suffrage, Election Commission of India, Representation of the People Act, Bihar Elections, Citizenship, Electoral Integrity.

1. Constitutional Framework Governing Electoral Rolls and Adult Suffrage

Part XV of the Indian Constitution provides a well-organized system that gives the creation and upkeep of electoral rolls in India constitutional legitimacy. Together, Articles 324 to 329 govern how elections are conducted and protect democracy against capricious executive intervention. Articles 324, 325, and 326 of the Constitution serve as the foundation for voter eligibility and electoral roll creation. Together, these clauses strike a balance between two conflicting constitutional goals: maintaining the integrity and legitimacy of the election process while guaranteeing universal participation through adult suffrage.¹

i. Article 324: Powers of the Election Commission of India

The Election Commission of India is granted "superintendence, direction, and control" of elections to Parliament, State Legislatures, and the Presidential and Vice-Presidential posts under Article 324. The clause creates the Election Commission as a separate constitutional body free from political interference.

The Supreme Court has consistently interpreted Article 324 broadly. In *Mohinder Singh Gill v. Chief Election Commissioner*², the Court ruled that Article 324 is a reservoir of constitutional powers enabling the Commission to intervene wherever statutory legislation is silent, provided such action does not infringe constitutional or legislative prohibitions. Consequently, the Commission possesses adequate jurisdiction to undertake significant modification of electoral rolls whenever necessary to ensure free and fair elections.

However, these powers are not absolute. The Election Commission remains bound by constitutional principles, statutory provisions enacted by Parliament, and judicial review. Therefore, every Special Intensive Revision (SIR) must satisfy the requirements of legality, procedural fairness, transparency, and non-arbitrariness.

ii. Article 325: Equality in Electoral Registration

Article 325 provides:

"Every territorial constituency will have a single general electoral roll, and no one may be

¹ Representation of the People Act, 1950, Preamble.

² *Mohinder Singh Gill v Chief Election Commissioner* (1978) 1 SCC 405.

excluded from it or claim to be on a special electoral roll solely because of their race, religion, caste, sex, or any combination of these."³

The constitutional commitment to political equality is embodied in this clause. It upholds the secular nature of Indian democracy and forbids the establishment of distinct sectarian election rolls, which were in place during the colonial era.⁴

Article 325 has two significant implications. First, it guarantees that any citizen, regardless of social or religious affiliation, can participate through a shared voting roster. Secondly, it prohibits discrimination during the preparation and revision of electoral rolls. Consequently, the Election Commission cannot implement policies that directly or indirectly discriminate against any class of citizens on reasons that are prohibited by the Constitution, even though it may verify citizenship or residency.⁵

iii. Article 326: Constitutional Basis of Adult Suffrage

Article 326 provides that elections to the House of the People and the Legislative Assemblies of States shall be conducted on the basis of **adult suffrage**. Every citizen of India who has attained eighteen years of age and is not otherwise disqualified under the Constitution or any law made by Parliament is entitled to be registered as an elector.

The provision reflects one of the most progressive decisions of the Constituent Assembly. At the commencement of the Constitution, India adopted universal adult franchise despite widespread illiteracy and poverty, recognising political equality as an indispensable element of democratic governance.⁶

Nevertheless, Article 326 does not create an unrestricted right to vote. It expressly permits Parliament to prescribe reasonable qualifications and disqualifications relating to:

- Non-residence;

³ Constitution of India, art. 325.

⁴ M.P. Jain, *Indian Constitutional Law* (8th ed., LexisNexis, 2018) 1023–1025.

⁵ Constitution of India, art. 325; *Indra Sawhney v. Union of India*, 1992 Supp (3) SCC 217 (on the constitutional principle of equality)

⁶ Constituent Assembly Debates, Vol. IX (1949); Granville Austin, *The Indian Constitution: Cornerstone of a Nation* (Oxford University Press, 1966)

- Unsoundness of mind declared by a competent court;
- Crime;
- Corrupt or illegal electoral practices.⁷

Thus, eligibility under Article 326 must be read together with the statutory framework governing electoral registration.⁸

iv. Right to Vote: Constitutional or Statutory?

Although Article 326 establishes adult suffrage as a constitutional principle, the Supreme Court has repeatedly clarified that the **exercise of the right to vote is statutory in nature**. The entitlement to cast a vote arises only after a person's name has been validly entered into the electoral roll prepared under the Representation of the People Act, 1950.⁹

At the same time, the Court has recognised that the democratic values underlying electoral participation derive constitutional protection. In *People's Union for Civil Liberties (PUCL) v. Union of India*, the Supreme Court observed that free and fair elections constitute part of the basic structure of the Constitution. Consequently, while voting may be exercised through statute, electoral administration must always remain consistent with constitutional guarantees of equality, fairness and democratic participation.¹⁰

The present debate concerning the Special Intensive Revision illustrates this constitutional relationship. The issue is not whether the Election Commission possesses the authority to revise electoral rolls it undoubtedly does but whether the manner in which such authority is exercised adequately protects the constitutional objective of universal adult suffrage.¹¹

2. Statutory Framework Governing Electoral Rolls

While Article 326 of the Constitution lays down the constitutional foundation for electoral participation, the detailed legal framework governing the preparation, maintenance and

⁷ Constitution of India, art. 326; Representation of the People Act, 1950

⁸ Representation of the People Act, 1950

⁹ *Jyoti Basu v. Debi Ghosal*, (1982) 1 SCC 691; *Jagan Nath v. Jaswant Singh*, AIR 1954 SC 210

¹⁰ *People's Union for Civil Liberties v. Union of India*, (2013) 10 SCC 1

¹¹ *Mohinder Singh Gill v. Chief Election Commissioner*, (1978) 1 SCC 405; *A.C. Jose v. Sivan Pillai*, (1984) 2 SCC 656

revision of electoral rolls has been established through parliamentary legislation. The principal statute in this regard is the **Representation of the People Act, 1950**, which is supplemented by the **Registration of Electors Rules, 1960**. Together, these instruments constitute the legal architecture for electoral registration in India and ensure that the electoral roll remains an accurate and reliable record of eligible voters.¹²

1. Representation of the People Act, 1950

The Representation of the People Act, 1950 primarily regulates matters relating to the preparation and maintenance of electoral rolls, the allocation of seats, the delimitation of constituencies and the qualifications required for registration as an elector. Unlike the Representation of the People Act, 1951, which is principally concerned with the conduct of elections and electoral disputes, the 1950 Act focuses on determining who is entitled to participate in the electoral process.

The Act vests the Election Commission of India with the authority to prepare electoral rolls for every parliamentary and assembly constituency. Section 15 empowers the Commission to undertake the preparation of electoral rolls, while Sections 21 and 22 authorise periodic revisions and corrections whenever circumstances require. These provisions recognise that electoral rolls cannot remain static, as demographic changes, migration, deaths and newly eligible voters necessitate continuous updating. Further, Section 23 enables an eligible citizen whose name has been omitted from the electoral roll to seek inclusion before the prescribed cut-off date. Read together, these provisions demonstrate the legislative intent that electoral rolls should remain living public records capable of being revised whenever necessary to preserve both their accuracy and completeness.

2. Registration of Electors Rules, 1960

The Registration of Electors Rules, 1960 supplement the statutory framework by prescribing the procedural mechanism for preparing and revising electoral rolls. These Rules regulate every stage of the registration process, beginning with the publication of draft electoral rolls and extending to the filing of claims for inclusion, objections against existing entries, correction of inaccuracies and deletion of names where legally justified.

¹² Representation of the People Act, 1950; Registration of Electors Rules, 1960

They also prescribe the procedure to be followed by electoral authorities while adjudicating such claims and objections.¹³

An important feature of the Rules is their incorporation of the principles of natural justice into electoral administration. Before an elector's name can be removed from the electoral roll, the concerned individual is ordinarily entitled to receive notice and be afforded a reasonable opportunity to present objections or furnish relevant evidence.¹⁴ The decision-making process, therefore, assumes a quasi-judicial character, ensuring that the power to revise electoral rolls is exercised fairly and transparently rather than arbitrarily.¹⁵ Such procedural safeguards reinforce public confidence in the integrity of electoral administration and minimise the risk of wrongful disenfranchisement.

3. Aadhaar and Electoral Registration

Recent legislative developments have introduced provisions permitting the voluntary linkage of Aadhaar with electoral records with the objective of identifying duplicate or multiple registrations and improving the accuracy of electoral rolls.¹⁶ Significantly, Parliament has consciously refrained from making Aadhaar a mandatory condition for electoral registration. This legislative choice reflects the recognition that Aadhaar functions primarily as an identity verification mechanism and not as conclusive proof of Indian citizenship¹⁷.

The Election Commission has consistently clarified that Aadhaar authentication cannot by itself determine an individual's eligibility to be enrolled as an elector.¹⁸ Since Article 326 confines the franchise exclusively to citizens of India, the determination of eligibility must continue to rest upon documentary evidence capable of establishing citizenship in accordance with the statutory framework. This distinction assumes particular importance in the context of the Special Intensive Revision undertaken in Bihar, where concerns have arisen regarding the nature of documents required during the verification process. While

¹³ Registration of Electors Rules, 1960, rr. 10–26

¹⁴ Registration of Electors Rules, 1960, rr. 21A–23; Representation of the People Act, 1950, ss. 22–23

¹⁵ *Lal Babu Hussein v. Electoral Registration Officer*, (1995) 3 SCC 100

¹⁶ Election Laws (Amendment) Act, 2021

¹⁷ Aadhaar (Targeted Delivery of Financial and Other Subsidies, Benefits and Services) Act, 2016, ss. 2(v) & 9

¹⁸ Election Commission of India, *Frequently Asked Questions on Voluntary Aadhaar Linking with Electoral Rolls* (2022)

Aadhaar may facilitate identity verification, it cannot substitute the legal requirements governing proof of citizenship under the constitutional and statutory scheme.¹⁹

4. Special Intensive Revision (SIR): Nature, Purpose and Procedure

The Special Intensive Revision (SIR) represents one of the most comprehensive mechanisms employed by the Election Commission of India to verify the authenticity and accuracy of electoral rolls before the conduct of elections. Unlike the routine annual summary revision, which largely focuses on updating electoral records through claims and objections, an SIR involves an extensive field-based verification exercise aimed at identifying inaccuracies and ensuring that the electoral roll faithfully reflects the existing body of eligible electors. The process is intended to strengthen the integrity of the electoral database by removing duplicate registrations, deleting the names of deceased persons or individuals who have permanently shifted their ordinary residence, incorporating newly eligible voters upon attaining the qualifying age and correcting errors in existing entries.²⁰

Booth Level Officers (BLOs), who are assigned to each polling place and tasked with doing door-to-door voter verification, are mostly responsible for the execution of a SIR. The officers distribute enumeration forms, gather pertinent supporting documentation as needed, and confirm the information provided by the residents throughout this exercise. The Electoral Registration Officer receives the information acquired during the field verification and reviews the reports and accompanying documentation before creating and disseminating the updated electoral roll. The purpose of this multi-layered administrative procedure is to guarantee that changes are founded not only on administrative judgment but also on objective verification.²¹

Equally significant are the procedural safeguards embedded within the statutory framework governing the revision exercise. An elector's name cannot ordinarily be deleted merely because a particular document is unavailable at the initial stage of verification. The Representation of the People Act, 1950 and the Registration of Electors Rules, 1960 require compliance with prescribed procedures, including the issuance of notice and the grant of a reasonable opportunity to respond wherever deletion is contemplated.²² These safeguards

¹⁹ Constitution of India, art. 326; Representation of the People Act, 1950

²⁰ Election Commission of India, *Manual on Electoral Rolls*

²¹ Registration of Electors Rules, 1960; Election Commission of India, *Manual on Electoral Rolls*

²² Representation of the People Act, 1950, ss. 22–23; Registration of Electors Rules, 1960

embody the principles of natural justice and seek to prevent arbitrary exclusion from the electoral process while preserving the accuracy of electoral rolls.

The Election Commission has consistently maintained that the objective of a Special Intensive Revision is not to curtail the electorate but to enhance the credibility and reliability of electoral rolls by ensuring that only those persons who satisfy the constitutional and statutory qualifications remain enrolled. Nevertheless, the exercise has attracted significant public debate and academic scrutiny. Critics contend that extensive documentation requirements may disproportionately affect economically weaker sections, migrant workers, internally displaced persons, elderly citizens and other vulnerable groups who may face practical difficulties in producing formal documentary evidence. Consequently, the constitutional legitimacy of any Special Intensive Revision depends not merely upon its statutory foundation but equally upon the fairness, accessibility, transparency and proportionality with which the verification process is implemented.

5. The Bihar Special Intensive Revision: Constitutional Debate and Contemporary Challenges

The Special Intensive Revision (SIR) undertaken by the Election Commission of India (ECI) in Bihar has emerged as one of the most significant electoral developments in recent years. Unlike routine revisions, the Bihar exercise attracted nationwide attention due to its timing before the Legislative Assembly elections, the nature of documentary verification required, and the constitutional questions that arose concerning electoral participation and citizenship.²³

The Election Commission justified the exercise on the ground that a comprehensive revision of electoral rolls had not been undertaken in the State for several years. According to the Commission, demographic changes, interstate migration, deaths, duplicate registrations and changes in residence had considerably affected the accuracy of the electoral rolls. Consequently, a Special Intensive Revision became necessary to ensure that the electoral roll reflected only those individuals who were legally entitled to vote

²³ Election Commission of India, *Special Intensive Revision of Electoral Roll, Bihar, 2025* (Official Press Release)

under Article 326 of the Constitution.²⁴

The revision process required Booth Level Officers (BLOs) to undertake door-to-door verification, distribute enumeration forms, and verify prescribed documents submitted by electors. During this exercise, the Commission clarified that certain documents such as the Aadhaar Card and the Ration Card would not, by themselves, constitute proof of citizenship. Instead, they would merely assist in establishing the identity of an individual.

This clarification generated widespread political controversy. Several opposition parties argued that excluding Aadhaar and Ration Cards from the list of acceptable documents could disproportionately affect economically weaker sections, migrant labourers, internally displaced persons and elderly citizens who may not possess other documentary evidence.²⁵ Concerns were also expressed regarding the possibility of genuine electors being omitted from the electoral roll because of procedural difficulties rather than legal ineligibility.²⁶

The Election Commission, however, maintained that the objective of the exercise was neither to reduce the electorate nor to disenfranchise legitimate voters. Rather, it emphasised that the revision sought to remove duplicate, deceased and otherwise ineligible entries while ensuring that all eligible citizens continued to remain registered.

An important relaxation announced by the Commission was that where an individual's name already appeared in the electoral roll published on **1 January 2003**, such inclusion could ordinarily be relied upon during verification, thereby reducing the documentary burden upon long-standing electors. The goal of this action was to reduce disruption while preserving the electoral database's integrity.

The Bihar SIR therefore represents a constitutional dilemma rather than merely an administrative exercise.

It serves as an example of the ongoing difficulty in balancing two equally significant constitutional goals: maintaining the universality of adult suffrage and safeguarding the

²⁴ Election Commission of India, *Instructions for Special Intensive Revision, Bihar, 2025*

²⁵ Association for Democratic Reforms (ADR), *Statement on Electoral Roll Verification* (2025); PRS Legislative Research, *Election Laws (Amendment) Bill, 2021*

²⁶ Association for Democratic Reforms (ADR), Press Release on Bihar SIR (2025); Internet Freedom Foundation (IFF), *Commentary on Bihar SIR* (2025)

integrity of electoral registers.²⁷

6. Aadhaar, Citizenship and Electoral Eligibility

One of the principal controversies surrounding the Special Intensive Revision concerns the legal status of Aadhaar as evidence of citizenship.

The Aadhaar (Targeted Delivery of Financial and Other Subsidies, Benefits and Services) Act, 2016 establishes Aadhaar as a unique identification mechanism intended to facilitate the efficient delivery of welfare benefits and public services. The statutory framework does not declare Aadhaar to be proof of citizenship, domicile or nationality²⁸.

Consequently, the Election Commission has consistently maintained that Aadhaar cannot independently determine electoral eligibility under Article 326.²⁹

This distinction is constitutionally significant. Every citizen may obtain Aadhaar only after satisfying the conditions prescribed under the Aadhaar Act; however, the Act itself permits enrolment by residents and does not certify citizenship. Therefore, while Aadhaar may establish the identity of a resident, it cannot conclusively establish that the individual is an Indian citizen entitled to be enrolled as an elector.³⁰

The Calcutta High Court in **Rani Mistri v. State of West Bengal** observed that an Aadhaar Card does not by itself confer or establish citizenship or domicile. The judgment reinforces the limited statutory purpose of Aadhaar and supports the Election Commission's position that separate verification may be required where citizenship itself is in issue.³¹

Similarly, the Ration Card is issued under the welfare framework established by the National Food Security Act, 2013 for the purpose of food security. Since eligibility for subsidised food distribution differs from the constitutional requirements governing electoral registration, possession of a Ration Card cannot automatically establish citizenship.³²

²⁷ Constitution of India, arts. 324–326; *Mohinder Singh Gill v. Chief Election Commissioner*, (1978) 1 SCC 405

²⁸ Aadhaar (Targeted Delivery of Financial and Other Subsidies, Benefits and Services) Act, 2016, ss. 2(v), 9

²⁹ Constitution of India, art. 326; Election Commission of India, *FAQs on Voluntary Aadhaar Linking with Electoral Rolls* (2022)

³⁰ Aadhaar Act, 2016; Representation of the People Act, 1950

³¹ *Rani Mistri v. State of West Bengal*, Calcutta High Court

³² National Food Security Act, 2013; Representation of the People Act, 1950

However, critics argue that excluding these documents from the prescribed list may create practical hardships for disadvantaged sections of society, particularly where alternative documentation is unavailable. According to this view, documentary requirements should remain sufficiently flexible to avoid the exclusion of genuine electors merely because of administrative limitations.³³

The debate therefore concerns not only the legal status of Aadhaar but also the broader constitutional principle that electoral verification procedures should remain proportionate, accessible and non-discriminatory.

7. Judicial Interpretation of Electoral Roll Revision

Indian courts have repeatedly recognised the central importance of accurate electoral rolls in preserving democratic legitimacy. At the same time, judicial decisions emphasise that statutory powers exercised by electoral authorities remain subject to constitutional principles of fairness, equality and reasonableness.

In *Mohinder Singh Gill v. Chief Election Commissioner*,³⁴ the Supreme Court described free and fair elections as an essential component of constitutional democracy and recognised the wide powers vested in the Election Commission under Article 324. Nevertheless, those powers cannot override statutory provisions enacted by Parliament.

Similarly, in *A.C. Jose v. Sivan Pillai*,³⁵ the Supreme Court held that where Parliament has enacted legislation governing electoral procedures, the Election Commission must ordinarily act within that statutory framework rather than independently devising inconsistent procedures.

Another important decision is *Lal Babu Hussein v. Electoral Registration Officer*, wherein the Supreme Court observed that inclusion or deletion of names from electoral rolls carries serious civil consequences. Accordingly, electoral authorities are expected to observe principles of natural justice before removing an individual's name from the electoral roll.³⁶

The Court stressed that electoral registration cannot be undertaken mechanically. Every deletion must be supported by objective material and must ordinarily provide the affected

³³ Association for Democratic Reforms (ADR), Representation on Bihar SIR (2025)

³⁴ *Mohinder Singh Gill v. Chief Election Commissioner*, (1978) 1 SCC 405

³⁵ *A.C. Jose v. Sivan Pillai*, (1984) 2 SCC 656

³⁶ *Lal Babu Hussein v. Electoral Registration Officer*, (1995) 3 SCC 100

elector with an opportunity to present his or her case.

In *People's Union for Civil Liberties (PUCL) v. Union of India*, while dealing with the right to cast a negative vote (NOTA), the Supreme Court reiterated that free and fair elections form part of the basic structure of the Constitution. Electoral procedures should therefore promote democratic participation rather than create unnecessary barriers to the exercise of franchise.

Collectively, these decisions establish that although the Election Commission possesses extensive constitutional authority, its powers remain subject to constitutional limitations designed to protect democratic participation and procedural fairness.

8. Critical Analysis

The controversy surrounding the Bihar Special Intensive Revision demonstrates the delicate balance between administrative efficiency and constitutional democracy. Both supporters and critics of the exercise raise legitimate constitutional concerns.

From the perspective of electoral integrity, periodic verification of electoral rolls is indispensable. Electoral databases inevitably become inaccurate over time due to deaths, migration, duplication and changes of residence. Failure to revise electoral rolls may undermine public confidence in elections and compromise the representative character of democratic institutions. Consequently, the Election Commission is constitutionally justified in undertaking systematic verification exercises whenever circumstances demand.

Conversely, electoral reforms must remain consistent with the constitutional philosophy of inclusive democracy. India adopted universal adult suffrage at the commencement of the Constitution despite formidable socio-economic challenges. Any verification mechanism that inadvertently excludes genuine electors because of documentation barriers risks undermining this constitutional commitment.

The present controversy therefore should not be viewed as a conflict between electoral integrity and democratic participation. Rather, it concerns the manner in which these two constitutional objectives can be harmonised.

The Election Commission possesses both the constitutional authority and the statutory responsibility to maintain accurate electoral rolls. Simultaneously, it bears an equally important

obligation to ensure that verification procedures remain transparent, accessible and capable of accommodating citizens who may experience genuine documentary difficulties.

The constitutional legitimacy of any Special Intensive Revision ultimately depends not merely upon its statutory basis but upon the fairness of its implementation. Administrative efficiency cannot become a substitute for procedural justice. Equally, concerns regarding inclusiveness cannot justify the continued presence of fraudulent or duplicate entries in electoral rolls.

A balanced constitutional approach therefore requires rigorous verification accompanied by effective grievance redressal mechanisms, reasonable documentary flexibility, adequate public awareness, and meaningful opportunities for correction before final publication of electoral rolls. Such an approach preserves both the purity of elections and the constitutional guarantee of universal adult suffrage.

9. Recommendations and the Way Forward

The debate surrounding the Special Intensive Revision (SIR) should not be viewed solely through a political lens. Instead, it presents an opportunity to strengthen India's electoral framework by ensuring that electoral rolls remain both accurate and inclusive. A constitutional democracy can function effectively only when every eligible citizen is able to exercise the right to vote while preventing the participation of persons who are legally ineligible.

The following measures may assist in achieving this constitutional balance:

i. Greater Transparency in the Revision Process

The Election Commission should ensure that every stage of the Special Intensive Revision is transparent and publicly accessible. Detailed guidelines, frequently asked questions, timelines and the legal basis of documentary requirements should be made available in multiple regional languages. This would reduce confusion among electors and minimise misinformation.

ii. Strengthening Public Awareness

Many eligible voters, particularly those residing in rural and economically weaker regions, remain unaware of the legal requirements governing electoral registration. Comprehensive awareness campaigns through newspapers, social media, community centres and local

administration would significantly improve public participation in revision exercises.

iii. Flexible Documentary Verification

Although proof of citizenship is essential for electoral registration, authorities should recognise that vulnerable sections of society may face genuine difficulties in producing historical documents. Wherever legally permissible, verification should be supported through multiple corroborative documents instead of insisting upon a single rigid standard. Such flexibility would better reflect the constitutional commitment to universal adult suffrage.

iv. Effective Grievance Redressal

A person whose name has been deleted or whose application has been rejected should have access to a simple, affordable and time-bound appellate mechanism. Decisions affecting electoral registration should contain written reasons, enabling the aggrieved elector to challenge administrative action wherever necessary.

v. Use of Technology with Constitutional Safeguards

Digitisation has considerably improved electoral administration. However, technological solutions should complement not replace procedural fairness. Online verification systems, digital tracking of applications and electronic publication of draft rolls should be accompanied by adequate safeguards for privacy, data protection and accessibility.

vi. Periodic Revision Instead of Extraordinary Exercises

Regular annual revisions carried out efficiently may reduce the necessity of extensive Special Intensive Revisions. Continuous updating of electoral rolls would minimise administrative burdens and lessen the possibility of large-scale controversies immediately preceding elections.

vii. Judicial Oversight and Institutional Accountability

While electoral administration should remain independent, judicial review continues to serve as an important constitutional safeguard against arbitrary action. Courts should continue to ensure that electoral verification exercises conform to constitutional guarantees of equality, natural justice and reasonableness without unnecessarily interfering in the functioning of the Election Commission.

10. Conclusion

The preparation and maintenance of electoral rolls represent one of the most fundamental responsibilities entrusted to the Election Commission of India. The constitutional guarantee of universal adult suffrage under Article 326 derives practical significance only when eligible citizens are duly registered as electors. Consequently, the integrity of electoral rolls is indispensable to the legitimacy of democratic governance.

The Special Intensive Revision undertaken in Bihar has revived important constitutional debates concerning citizenship, documentary verification, administrative discretion and electoral participation. While the Election Commission has defended the exercise as a statutory obligation intended to preserve the purity of electoral rolls, critics have questioned whether stringent verification requirements may inadvertently affect genuine voters, particularly those belonging to economically and socially vulnerable communities.

A careful examination of the constitutional framework reveals that neither perspective should be viewed in isolation. Articles 324, 325 and 326 collectively impose dual obligations upon the Election Commission: first, to ensure that electoral rolls contain only those persons legally entitled to vote; and secondly, to guarantee that every eligible citizen is afforded a fair and reasonable opportunity to secure electoral registration. Electoral integrity and universal adult suffrage are therefore complementary constitutional values rather than competing objectives.

Judicial decisions of the Supreme Court consistently affirm that while the Election Commission enjoys broad constitutional authority, its powers remain subject to statutory limitations and constitutional principles of fairness, equality and procedural justice. The right to vote, though exercised through statutory mechanisms, occupies a central position within India's democratic constitutional framework.

The controversy surrounding Aadhaar and Ration Cards further illustrates the distinction between proof of identity and proof of citizenship. The Election Commission's position that these documents do not independently establish citizenship is legally sustainable within the existing statutory framework. Nevertheless, implementation of verification procedures must remain sufficiently flexible to ensure that genuine electors are not excluded merely because of documentary deficiencies beyond their control.

The Special Intensive Revision should therefore be understood not as an attempt to curtail democratic participation but as an administrative mechanism whose constitutional legitimacy depends entirely upon the fairness of its implementation. A transparent, proportionate and accessible verification process can simultaneously protect electoral integrity and preserve the constitutional promise of universal adult suffrage.

Ultimately, democracy is strengthened not merely by conducting elections but by ensuring that every eligible citizen has an equal opportunity to participate in them. Electoral reforms must therefore continue to uphold both constitutional accountability and democratic inclusion, preserving public confidence in one of the world's largest electoral systems.