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SPECIAL INTENSIVE REVISION (SIR) OF ELECTORAL ROLLS: A CONSTITUTIONAL ANALYSIS

AUTHORED BY - ROHAN ARUN WAGHMARE

ABSTRACT

Free and fair elections constitute one of the basic features of the Constitution of India¹. The legitimacy of every election depends not only upon peaceful polling and accurate counting of votes but also upon the correctness of the electoral roll from which those votes are cast. Recognising this constitutional importance, Article 324² entrusts the Election Commission of India with the responsibility of preparing and maintaining electoral rolls.

The Special Intensive Revision (SIR) of electoral rolls undertaken by the Election Commission generated considerable constitutional debate. While the Commission justified the exercise as necessary for maintaining accurate electoral rolls by removing duplicate, erroneous and ineligible entries, concerns were raised that the process might unintentionally result in the exclusion of genuine electors because of documentary or procedural difficulties. These issues eventually came before the Supreme Court.

This paper examines the constitutional validity of the SIR by analysing the relevant constitutional provisions, the Representation of the People Act, 1950, the Registration of Electors Rules, 1960³, important judicial precedents and the Supreme Court's decision upholding the exercise. It also examines whether the constitutional objective of maintaining accurate electoral rolls can be effectively balanced with the equally important democratic objective of ensuring that no eligible citizen is denied participation in the electoral process except in accordance with law.

The paper concludes that while the Supreme Court has upheld the constitutional validity of the SIR, its long-term success will depend upon transparent implementation, procedural fairness and continued public confidence in the electoral process.

Keywords: Election Commission of India, Special Intensive Revision, Electoral Rolls, Article 324, Representation of the People Act, Universal Adult Suffrage, Constitutional Law.

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

² Constitution of India, art 324

³ Registration of Electors Rules, 1960.

1. Introduction

Every election begins much before the first vote is cast. It begins with the preparation of the electoral roll⁴. A polling process may be conducted peacefully, votes may be counted accurately and results may be declared transparently. Yet, if the electoral roll itself is inaccurate, the democratic legitimacy of the election may still be questioned. Conversely, if the process of preparing or revising the electoral roll unintentionally excludes eligible citizens, the constitutional promise of representative democracy also suffers. The preparation of an electoral roll is therefore not merely an administrative exercise but an important constitutional responsibility.

Recognising this importance, Article 324 of the Constitution vests in the Election Commission of India the superintendence, direction and control of the preparation of electoral rolls and the conduct of elections. Over the years, the Election Commission has developed different mechanisms for updating electoral rolls so that they accurately reflect the electorate at a particular point of time. These include summary revisions, intensive revisions and, where considered necessary, special revisions under the statutory framework.

The Special Intensive Revision (SIR) undertaken in Bihar attracted widespread public attention because of its scale, timing and methodology. According to the Election Commission, the exercise became necessary after more than two decades had passed since the last intensive revision in 2003. The Commission stated that continuous migration, deaths, duplicate enrolments and demographic changes required a comprehensive verification of the electoral roll to ensure that only eligible electors remained enrolled.

The exercise, however, also raised significant constitutional questions. Various political parties, civil society organisations and individual citizens expressed concerns regarding documentary requirements, the possibility of exclusion of genuine electors and the extent of the Election Commission's constitutional powers under Article 324. It was also argued that certain aspects of the exercise might indirectly involve questions relating to citizenship, which are ordinarily governed by a separate legal framework.

These issues ultimately reached the Supreme Court of India, which upheld the constitutional validity of the SIR while simultaneously emphasising that the exercise must remain consistent with the Constitution, the Representation of the People Act, 1950 and the principles of natural justice. The judgment reaffirmed the constitutional responsibility of the Election Commission to maintain accurate electoral rolls but also stressed that fairness in

⁴ Representation of the People Act, 1950, ss 15–23; Registration of Electors Rules, 1960.

implementation is equally important.

This paper does not examine the SIR from a political perspective. Nor does it attempt to evaluate the wisdom of governmental policy. Instead, it examines a narrower but more fundamental constitutional question: **how should the powers of the Election Commission under Article 324 be exercised while ensuring that the constitutional objective of maintaining accurate electoral rolls does not unnecessarily affect the democratic participation of eligible citizens?**

To answer this question, the paper first examines the constitutional and statutory framework governing electoral roll revision. It then analyses the evolution of judicial interpretation of Article 324, the legal basis of the SIR, the Supreme Court's reasoning in upholding its validity and the broader constitutional implications arising from the judgment.

2. Constitutional and Statutory Framework

The constitutional validity of the Special Intensive Revision (SIR) cannot be examined in isolation. It must be understood within the larger constitutional scheme governing elections in India. The Constitution does not confer absolute authority upon any single institution. Instead, it distributes responsibility for the electoral process between Parliament, which enacts the law, and the Election Commission of India, which implements that law through an independent constitutional mechanism.

The starting point is **Article 324** of the Constitution, which vests in the Election Commission the superintendence, direction and control of the preparation of electoral rolls and the conduct of elections to Parliament, State Legislatures and the offices of the President and Vice-President. The inclusion of electoral roll preparation within Article 324 itself reflects the importance attached by the Constitution to the integrity of the electoral process⁵. The Commission is therefore not merely responsible for conducting polling; it is equally responsible for ensuring that the electoral roll accurately reflects those legally entitled to participate in the election.

However, Article 324 does not operate in isolation. It must be read together with **Articles 325 and 326**, which embody two equally significant constitutional principles. Article 325⁶ mandates a single general electoral roll for every territorial constituency and prohibits exclusion from the electoral roll on grounds only of religion, race, caste or sex. Article 326⁷ adopts the principle of universal adult suffrage by providing that elections to the House of the People

⁵ Representation of the People Act, 1950, ss 15–23.

⁶ Constitution of India, art 325.

⁷ Constitution of India, art 326.

and the State Legislative Assemblies shall be based on adult suffrage, subject to the qualifications and disqualifications prescribed by the Constitution and by law.

A combined reading of these provisions demonstrates that the Constitution seeks to achieve two objectives simultaneously. First, the electoral roll must contain only those persons who are legally entitled to be enrolled as electors. Secondly, every citizen satisfying the prescribed qualifications must have a fair opportunity to be included in that roll. These objectives are complementary. An electoral roll that contains ineligible persons affects the purity of elections, while wrongful exclusion of eligible electors weakens representative democracy.

The constitutional framework is supplemented by **Articles 327 and 328**, which authorise Parliament and, in limited situations, State Legislatures to enact laws governing elections. Acting under Article 327, Parliament enacted the **Representation of the People Act, 1950**, dealing principally with electoral rolls and qualifications of electors, and the **Representation of the People Act, 1951**, governing the conduct of elections, election disputes and related matters. These statutes provide the legislative framework within which the Election Commission exercises its constitutional functions.

For the purposes of the present discussion, the Representation of the People Act, 1950 assumes particular significance. Section 21 recognises that electoral rolls require periodic revision to remain accurate⁸. More importantly, Section 21(3)⁹ authorises the Election Commission to direct a **special revision** of an electoral roll whenever it considers such revision necessary, subject to the procedure prescribed by law. This provision forms one of the principal statutory foundations relied upon by the Election Commission in support of the Special Intensive Revision.

The statutory scheme is further elaborated by the **Registration of Electors Rules, 1960**, which prescribe the procedure for preparing, revising and correcting electoral rolls. The Rules require publication of draft rolls, consideration of claims and objections, correction of errors, and the availability of statutory remedies against wrongful inclusion or deletion. These procedural safeguards are intended to ensure that revision of electoral rolls is not merely accurate but also fair.

This statutory framework assumes considerable constitutional importance. Although Article 324 confers broad authority upon the Election Commission, that authority is not unlimited. The Commission is expected to act within the framework created by Parliament and in conformity with constitutional principles such as equality, fairness and natural justice. The

⁸ Representation of the People Act, 1950, s 21.

⁹ Representation of the People Act, 1950, s 21(3).

relationship between Article 324 and the Representation of the People Acts is therefore one of constitutional harmony rather than constitutional conflict.

The constitutional controversy surrounding the SIR must be viewed against this background. The principal issue is not whether electoral rolls may be revised. The Constitution and the Representation of the People Act clearly recognise that they can and, in appropriate circumstances, must be revised. The real issue is whether the procedure adopted during such revision remains consistent with the constitutional balance between maintaining accurate electoral rolls and protecting the democratic participation of eligible citizens.

That constitutional balance has not been developed by constitutional text alone. Its practical meaning has evolved through a long line of decisions of the Supreme Court interpreting Article 324 and defining the constitutional limits of the Election Commission's powers. It is to those decisions that the discussion now turns.

3. Judicial Evolution of Article 324: From Constitutional Power to Constitutional Accountability

The constitutional validity of the Special Intensive Revision cannot be determined merely by reading the text of Article 324. Although the provision confers the power of superintendence, direction and control over the preparation of electoral rolls and the conduct of elections upon the Election Commission, the extent of that power has largely been shaped through judicial interpretation. Over the last five decades, the Supreme Court has consistently recognised the Election Commission as an independent constitutional authority while simultaneously defining the legal limits within which its powers must be exercised.

The foundation of modern electoral jurisprudence was laid in *Mohinder Singh Gill v. Chief Election Commissioner* (1978). The Supreme Court held that Article 324 is a reservoir of constitutional power intended to ensure that free and fair elections are not defeated merely because legislation does not provide for every possible situation¹⁰. At the same time, the Court made it equally clear that this constitutional power is not arbitrary. It exists to supplement the statutory framework and to preserve the integrity of the electoral process wherever the law is silent.

This principle was further refined in *A.C. Jose v. Sivan Pillai* (1984). The Court clarified that while Article 324 enables the Election Commission to issue appropriate directions where legislation is silent, it cannot exercise those powers in a manner that overrides or contradicts laws enacted

¹⁰ *Mohinder Singh Gill v Chief Election Commissioner* (1978) 1 SCC 405.

by Parliament. The decision therefore established an important constitutional limitation. The Election Commission possesses wide constitutional authority, but that authority must always operate within the statutory framework governing elections.

The constitutional status of the Election Commission was further strengthened in *T.N. Seshan v. Union of India (1GG5)*. Upholding the validity of the multi-member Election Commission, the Supreme Court reaffirmed that the Commission is an independent constitutional institution and not merely an administrative department of the Government. The judgment recognised that the independence of the Election Commission is itself an important safeguard for ensuring free and fair elections. At the same time, the Court emphasised that constitutional independence carries with it a corresponding responsibility to act fairly, reasonably and in accordance with law.

The Supreme Court subsequently expanded the constitutional understanding of elections beyond the mechanics of polling. In *People's Union for Civil Liberties (PUCL) v. Union of India*, the Court recognised that meaningful participation in democracy depends upon an informed electorate. Although the right to vote is statutory, the freedom of voters to make an informed electoral choice forms part of the guarantee of freedom of speech and expression under Article 19(1)(a). The decision reinforced the idea that electoral law must be interpreted in a manner that strengthens democratic participation rather than merely regulating the electoral process.

Similarly, in *Kuldip Nayar v. Union of India (2006)*, the Constitution Bench reiterated that the right to vote is a statutory right governed by parliamentary legislation. However, the Court also recognised that elections occupy a central place within India's constitutional democracy. Consequently, legislation regulating elections must satisfy constitutional requirements of equality, fairness and non-arbitrariness.

A reading of these decisions together reveals a consistent constitutional approach. The Supreme Court has never treated Article 324 as either an unrestricted source of power or as a provision with little independent significance. Instead, the Court has repeatedly adopted a middle path. The Election Commission possesses broad constitutional authority to ensure free and fair elections, but that authority must remain consistent with the Constitution, parliamentary legislation and the principles of natural justice.

These judicial principles provided the constitutional foundation upon which the Supreme Court examined the validity of the Special Intensive Revision. The challenge before the Court was therefore not whether the Election Commission possessed constitutional authority in general, but whether the particular manner in which that authority had been exercised during the SIR remained within the constitutional and statutory limits already recognised by earlier

decisions.

4. The Bihar Special Intensive Revision: Constitutional Questions Before the Court

The Special Intensive Revision (SIR) undertaken by the Election Commission in Bihar did not become controversial merely because electoral rolls were being revised. Electoral rolls have always been subject to periodic revision under the Representation of the People Act, 1950. Nor was the constitutional challenge directed against the power of the Election Commission to revise electoral rolls in appropriate cases. The real controversy centred on the manner in which the Commission proposed to carry out the revision and whether the procedure adopted was consistent with the constitutional guarantees governing democratic participation.

The Election Commission explained that Bihar had not undergone an intensive revision of electoral rolls since **2003**. During the intervening years, electoral rolls had largely been updated through summary revisions, which primarily depended upon additions, deletions and corrections based on claims, objections and routine verification. According to the Commission, changing demographic patterns, migration, duplicate enrolments and the passage of more than two decades justified a comprehensive verification exercise before the forthcoming Legislative Assembly elections.

Accordingly, the Commission directed a Special Intensive Revision under Section 21(3) of the Representation of the People Act, 1950¹¹. The exercise involved house-to-house verification by Booth Level Officers, distribution of Enumeration Forms, verification of prescribed documents wherever necessary and preparation of a revised electoral roll after considering claims and objections in accordance with the statutory procedure.

The Commission also adopted the electoral roll prepared after the **2003 intensive revision** as the starting point for the exercise. It explained that the 2003 revision had itself been conducted through extensive field verification and therefore provided a reliable benchmark for subsequent revisions. Electors whose names had been entered after 2003 were required to furnish the prescribed Enumeration Form together with supporting documents in accordance with the directions issued by the Commission.

These features of the SIR gave rise to several constitutional objections.

The petitioners did not dispute that electoral rolls should remain accurate. Their principal

¹¹ Representation of the People Act, 1950, s 21(3).

concern was that the procedure adopted during the revision might unintentionally result in the exclusion of genuine electors, particularly those belonging to economically weaker sections, migrant workers, elderly persons and citizens who might experience difficulty in producing documents within the prescribed period. It was also argued that certain aspects of the exercise indirectly involved questions relating to citizenship, which, according to the petitioners, lay outside the jurisdiction of the Election Commission.

Another important challenge related to the scope of Article 324. While the Election Commission relied upon its constitutional responsibility to maintain accurate electoral rolls together with Section 21(3) of the Representation of the People Act, 1950, the petitioners argued that Article 324 could not be interpreted so broadly as to permit the Commission to introduce procedures that effectively altered the statutory scheme enacted by Parliament¹².

The timing of the exercise also formed part of the challenge. Since the SIR was undertaken before the Bihar Legislative Assembly elections, concerns were expressed that genuine electors whose names were omitted from the revised rolls might be deprived of an opportunity to participate in the forthcoming election. The petitioners therefore urged the Supreme Court to examine not merely the legal authority of the Election Commission but also the constitutional reasonableness of the procedure adopted.

It is important to appreciate that these objections did not all raise the same constitutional issue. Some related to the **source of the Commission's power**. Others questioned the **manner in which the power had been exercised**. Still others focused upon the **adequacy of procedural safeguards** available to affected electors.

The constitutional challenge therefore required the Supreme Court to examine four closely connected questions:

- Does Article 324, read with the Representation of the People Act, 1950, authorise the Election Commission to undertake a Special Intensive Revision?
- Is the objective of maintaining accurate electoral rolls sufficient to justify the procedural requirements introduced during the SIR?
- Does the revision process adequately protect eligible electors against arbitrary or mistaken exclusion?
- Can the Election Commission verify electoral eligibility without assuming the role of deciding disputed questions of citizenship?

¹² *A.C. Jose v Sivan Pillai* (1984) 2 SCC 656

These questions formed the core of the litigation before the Supreme Court. The significance of the judgment lies not merely in the answers ultimately given by the Court, but in the constitutional principles that guided those answers. The Court was therefore required to balance two constitutional concerns which are equally important in a representative democracy. On one hand lies the constitutional obligation to maintain an accurate and reliable electoral roll. On the other lies the equally important obligation to ensure that every eligible citizen has a fair opportunity to participate in the democratic process.

It is against this constitutional background that the Supreme Court examined the validity of the Special Intensive Revision.

5. Constitutional Reasoning of the Supreme Court

The decision of the Supreme Court in *Association for Democratic Reforms v. Election Commission of India* (2026) is significant not only because it upheld the constitutional validity of the Special Intensive Revision, but because it clarified the constitutional relationship between Article 324, parliamentary legislation and the democratic rights of electors. Rather than examining the SIR only as an administrative exercise, the Court considered whether the procedure adopted by the Election Commission satisfied the constitutional principles governing free and fair elections.

The first question before the Court was whether the Election Commission possessed the constitutional authority to undertake a Special Intensive Revision. The petitioners argued that although Article 324 confers broad powers upon the Commission, those powers cannot be exercised independently of the statutory framework enacted by Parliament¹³. The Election Commission, however, relied upon Article 324 together with Section 21(3) of the Representation of the People Act, 1950, which expressly authorises a special revision of electoral rolls whenever circumstances require such revision.

The Supreme Court accepted the Commission's interpretation. It held that Article 324 and Section 21(3) operate together and not in conflict with each other. The constitutional responsibility to prepare accurate electoral rolls is discharged through the statutory mechanism provided by Parliament. Consequently, the Court concluded that the Special Intensive Revision had both a constitutional and statutory foundation and could not be regarded as an exercise beyond the Commission's jurisdiction.

¹³ *Kuldip Nayar v Union of India* (2006) 7 SCC 1; *People's Union for Civil Liberties v Union of India* (2003) 4 SCC 399

The second and more substantial question concerned the **manner in which that power had been exercised**. The Court observed that the existence of legal authority does not by itself determine constitutional validity. Administrative action must also satisfy the requirements of fairness and reasonableness. It was therefore necessary to examine whether the procedure adopted during the SIR bore a rational relationship to the objective sought to be achieved.

In addressing this question, the Court applied the doctrine of proportionality¹⁴. It accepted that maintaining an accurate electoral roll constitutes a legitimate constitutional objective because the credibility of elections depends upon the correctness of the electoral roll. The Court further held that a detailed verification exercise had a reasonable connection with that objective.

However, the judgment also recognised that any procedure capable of affecting the voting rights of a large number of citizens must contain adequate safeguards against arbitrary exclusion.

This emphasis upon proportionality is one of the most important aspects of the judgment. The Court did not proceed on the basis that every administrative measure adopted by the Election Commission automatically becomes constitutionally valid. Instead, it examined whether the procedure balanced the need for accurate electoral rolls with the requirement of protecting eligible electors from avoidable hardship. During the course of the proceedings, the Election Commission clarified certain procedural aspects and expanded the range of acceptable documents. The Court considered these safeguards while concluding that the procedure, as ultimately implemented, satisfied constitutional requirements.

Another important issue concerned the distinction between **electoral eligibility** and **citizenship**. The petitioners expressed apprehension that documentary verification during the SIR might effectively require the Election Commission to decide questions of citizenship, a matter governed by separate statutory provisions. The Supreme Court recognised the importance of this concern but drew a clear legal distinction. It held that the Election Commission is empowered to verify whether a person fulfils the statutory requirements for inclusion in the electoral roll. It is not, however, the authority competent to finally determine disputed questions relating to citizenship. Such questions continue to be governed by the procedure prescribed under the relevant law. This clarification preserves the constitutional boundaries between different statutory authorities while enabling the Election Commission to discharge its electoral responsibilities.

¹⁴ *Association for Democratic Reforms & Ors. v Election Commission of India & Ors.*, Supreme Court of India, Judgment dated 27 May 2026.

Equally significant is the Court's emphasis on **procedural fairness**. The judgment repeatedly stresses that the constitutional validity of an electoral roll revision depends not only upon the objective of the exercise but also upon the fairness of its implementation. The availability of notice, the opportunity to submit relevant documents, consideration of claims and objections, and the existence of statutory remedies against wrongful exclusion were all treated as essential safeguards. The Court therefore viewed natural justice not as a procedural formality but as an integral part of the constitutional legitimacy of the revision process.

When read as a whole, the judgment does not confer unrestricted authority upon the Election Commission. Nor does it reduce the Commission's constitutional role to that of a mere implementing agency. Instead, it adopts a balanced approach. The Commission enjoys sufficient constitutional authority to maintain the integrity of electoral rolls, but that authority must always be exercised consistently with parliamentary legislation, constitutional principles and procedural fairness.

The judgment is therefore important not merely because it resolves the challenge to the Bihar SIR. It also provides guidance for future electoral roll revisions across the country. By harmonising Article 324 with the Representation of the People Act, the Supreme Court has reaffirmed that constitutional power and constitutional accountability must always operate together.

6. Constitutional Reflections

The decision in *Association for Democratic Reforms v. Election Commission of India* has largely settled the legal validity of the Special Intensive Revision. Nevertheless, the judgment raises broader constitutional questions regarding the manner in which electoral powers should be exercised in a constitutional democracy. These questions deserve academic consideration, not because the authority of the judgment is in doubt, but because constitutional law continues to evolve through judicial decisions, legislative action and administrative practice.

The first constitutional lesson emerging from the judgment is that **institutional independence must always be accompanied by institutional accountability**. The Constitution deliberately places the Election Commission beyond day-to-day executive control so that elections remain free and fair. However, constitutional independence does not imply immunity from constitutional scrutiny. Like every constitutional authority, the Commission must exercise its powers within the limits prescribed by the Constitution and the laws enacted by Parliament.

Judicial review therefore strengthens constitutional institutions by ensuring that public power is exercised according to constitutional standards.

The second lesson concerns the increasing role of **proportionality** in constitutional adjudication. Traditionally, election law disputes focused upon the existence of statutory authority. The SIR judgment demonstrates that modern constitutional review extends beyond this question. Courts now examine not only whether an authority possesses legal power, but also whether the manner in which that power is exercised is fair, reasonable and proportionate to the objective sought to be achieved. This approach recognises that constitutional legitimacy depends upon both the source of power and the manner of its exercise.

The judgment also highlights the continuing importance of **procedural fairness** in electoral administration. An electoral roll determines who may participate in representative government. Consequently, any process capable of affecting the inclusion or exclusion of electors must provide adequate safeguards against arbitrary decision-making. Notice to affected persons, reasonable opportunity to respond, consideration of claims and objections, and access to statutory remedies are not merely administrative requirements; they are constitutional safeguards intended to protect democratic participation.

Another important aspect of the judgment is the distinction maintained between **electoral administration and citizenship determination**. The Election Commission is constitutionally entrusted with preparing and revising electoral rolls. Questions relating to citizenship, however, continue to be governed by separate statutory provisions and competent authorities. By maintaining this distinction, the Supreme Court preserved the constitutional boundaries between different institutions while enabling each to discharge its respective functions according to law.

From a broader constitutional perspective, the judgment demonstrates that democracy is strengthened not only by ensuring that ineligible persons do not remain on the electoral roll, but also by ensuring that every eligible citizen receives a fair opportunity to remain enrolled. These objectives should not be viewed as competing constitutional values. Both contribute to the credibility of the electoral process and to public confidence in democratic institutions.

The judgment may also influence future electoral reforms. As electoral rolls become increasingly linked with digital databases, technology-assisted verification and electronic governance, questions relating to privacy, data accuracy, accessibility and procedural safeguards are likely to become more significant. While technology can improve administrative efficiency, it cannot replace the constitutional obligation to ensure fairness, transparency and equal treatment. Future reforms must therefore ensure that technological

advancement remains consistent with constitutional values.

Finally, the SIR litigation illustrates an important feature of constitutional governance. Constitutional disputes often arise not because institutions disagree about the objective to be achieved, but because they differ on the methods by which that objective should be pursued. In the present case, all parties accepted the importance of maintaining accurate electoral rolls. The real disagreement concerned the procedure adopted for achieving that objective. The Supreme Court resolved that disagreement by upholding the constitutional validity of the SIR while emphasising procedural safeguards designed to protect eligible electors. Whether those safeguards continue to inspire public confidence will ultimately depend upon their faithful implementation at the ground level.

7. Conclusion

The Special Intensive Revision of electoral rolls represents one of the most significant constitutional developments in Indian election law in recent years. Although it generated considerable public debate, the constitutional questions before the Supreme Court were precise and limited. The Court was required to determine whether the Election Commission possessed the authority to undertake such a revision, whether the procedure adopted was supported by the constitutional and statutory framework, and whether adequate safeguards existed to protect the rights of eligible electors.

The Supreme Court answered these questions substantially in favour of the Election Commission. It held that the SIR derives legal support from Article 324 of the Constitution read with Section 21(3) of the Representation of the People Act, 1950. At the same time, the Court made it clear that constitutional validity depends upon faithful compliance with statutory safeguards, principles of natural justice and procedural fairness. The judgment also reaffirmed that questions relating to citizenship continue to be governed by the procedure established under the relevant law and cannot be finally determined by the Election Commission while revising electoral rolls.

The broader importance of the judgment lies in the constitutional principles that it reinforces. It recognises that free and fair elections require accurate electoral rolls, while also acknowledging that democratic legitimacy depends upon ensuring that eligible citizens are not excluded without due process of law. These constitutional objectives are not mutually exclusive. Rather, they are complementary and must operate together if public confidence in the electoral process is to be preserved.

The present controversy also demonstrates that constitutional adjudication is not concerned

only with the distribution of institutional powers. It is equally concerned with the manner in which those powers are exercised. The doctrine of proportionality, procedural fairness and judicial review together ensure that constitutional authority is exercised responsibly and within the limits prescribed by law.

In conclusion, the Special Intensive Revision should not be viewed merely as an administrative exercise or as a political controversy. It represents an important constitutional development concerning the powers of the Election Commission and the continuing evolution of electoral jurisprudence in India. The Supreme Court has settled the question of legal validity. The continuing constitutional challenge will be to ensure that future electoral roll revisions are implemented with fairness, transparency and consistency so that the constitutional commitment to free and fair elections remains harmoniously balanced with the democratic participation of every eligible elector.

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