

F. no. HQ-16024/2/2020-EU-I-HQ
Unique Identification Authority of India
(Enrolment and Update Division)

UIDAI Head Office
Bangla Sahib Road, Behind Kali Mandir
Gole Market, New Delhi – 110 001
Dated 12.03.2025

Circular no. 1 of 2025

Subject: Policy regarding action in case of default in adherence to or violation of any regulation, process, standard, guideline or order issued by the Unique Identification Authority of India, by registrars, enrolment agencies or other service providers

The policy regarding action in case of default in adherence to or violation of any regulation, process, standard, guideline or order issued by the Unique Identification Authority of India, by Registrars, enrolment agencies or other service providers, version 5.0 (hereinafter referred to as the “instant policy”), annexed hereto, is issued hereby, pursuant to the provisions contained in sub-regulation (3) of regulation 26 of the Aadhaar (Enrolment and Update) Regulations, 2016, made in exercise of the powers conferred by, *inter alia*, sub-section (1) and sub-clause (s) of sub-section (2) of section 54 of the Aadhaar (Targeted Delivery of Financial and Other Subsidies, Benefits and Services) Act, 2016, read with, *inter alia*, clause [F] (“Financial Disincentives”) of the terms of engagement of registrar, issued *vide* UIDAI’s OM F. no. HQ-16024/4/2020-EU-I-HQ Part (1), dated 29.9.2022 and revised *vide* its OM of even number, dated 23.3.2023 and signed and furnished to UIDAI by registrars.

2. The instant policy supersedes the policy issued *vide* the Authority’s circular policy issued *vide* UIDAI’s circular F. no. HQ-16024/2/2020-EU-I-HQ, dated 30.11.2022 and modified *vide* its circular bearing the said number, dated 03.10.2023 and shall come into effect from 01.04.2025.
3. This issues with the approval of competent authority.

(Prabhakaran C. R.)
Deputy Director
Tel.: 011-23478444
Email: dd.eu1-hq@uidai.net.in

To:

1. All UIDAI Regional Offices
2. Deputy Director General, UIDAI Tech Centre
3. Deputy Director General (Finance), UIDAI HO
4. All Enrolment Registrars
5. Guard file

[Issued *vide* Circular no.1 of 2025, dated 12.03.2025]

Policy regarding action in case of default in adherence to or violation of any regulation, process, standard, guidelines or order issued by the Unique Identification Authority of India, by Registrars, enrolment agencies or other service providers (version 5.0)

1. Appointment of Registrars, enrolment agencies and other service providers is governed by Chapter V (Regulations 21 to 26) of the Aadhaar (Enrolment and Update) Regulations 2016. Regulation 26 thereof reads as under:

“26. Liability of Registrars, enrolling agencies and other service providers and action in case of default— (1) The Registrars, enrolling agencies, and other service providers, and the supervisors, operators or any other persons or agencies employed by them shall adhere to all regulations, processes, standards, guidelines, and orders issued by the Authority from time to time, and the code of conduct provided in Schedule V.

(2) The Authority shall monitor the enrolment activities of the Registrars, enrolling agencies and the operators, supervisors and other personnel associated with enrolment.

(3) Without prejudice to any other action which may be taken under the Act, for violation of any regulation, process, standard, guideline or order, by a Registrar or Enrolment Agency or any service provider or any other person, the Authority may immediately suspend the activities of such a Registrar or Enrolment Agency or service provider or concerned person, and after holding due enquiry, it may take steps for imposition of financial disincentives on such a Registrar or Enrolment Agency or service provider or any other person and for cancellation of the credentials, codes and permissions issued to them pursuant to the Act or these regulations, or any other steps as may be specifically provided for in the terms of engagement with the Authority.”

2. Further, clause [F] (“Financial Disincentives”) of the terms of engagement of Registrar, issued *vide* UIDAI’s OM F. no. HQ-16024/4/2020-EU-I-HQ Part (1), dated 29.9.2022, reads as under:

“[F] Financial Disincentives

a. UIDAI without prejudice to any other action which it may take under the Act, for violation of the Act, any regulation, direction issued by the Authority, process, standard, guideline or order, by the Registrar or its Enrolling Agency (through Registrar), may immediately suspend the activities of the Registrar or its Enrolling Agency after holding due enquiry, it may take steps for imposition of financial disincentives on the Registrar as per the UIDAI policy or guidelines and for cancellation of the credentials, codes and permissions issued to them pursuant to the Aadhaar Act, 2016 and regulations framed thereunder.

...

g. The financial disincentive shall be levied upon the Registrars against defaults as per the Policy for enforcing of Aadhaar (Enrolment and Update) Regulations 2016, process, standards, guidelines, Data Quality and containing corrupt / fraudulent practices issued by UIDAI, as modified from time to time.”

3. This policy is issued pursuant to the provisions contained in sub-regulation (3) of regulation 26 of the Aadhaar (Enrolment and Update) Regulations, 2016, read with the terms

of engagement of Registrar (hereinafter referred to as “instant policy”). The instant policy provides for the policy, process and guidelines for suspension of activities and the steps that may be taken for the imposition of financial disincentives and cancellation of credentials etc., for non-adherence to or violation of any regulation, process, standard, guideline or order issued by UIDAI, by a Registrar, enrolment agency or service provider, and any agency or other person employed by the aforesaid.

4. The provisions of the instant policy are without prejudice to any other action that may be taken as provided for under the Aadhaar (Targeted Delivery of Financial and Other Subsidies, Benefits and Services) Act, 2016 (hereinafter referred to as “the Act”) or any other applicable law.

5. **Procedure for establishing non-adherence to or violation of any regulation, process, standard, guideline or order**

5.1 Operator at an Aadhaar enrolment centre is required to follow the procedure as per regulation 11 of the Aadhaar (Enrolment and Update) Regulations, 2016 while providing Aadhaar enrolment or update services to an individual seeking enrolment or update of information in Aadhaar. Further, all equipment used in enrolment, such as computers, printers, biometric devices and other accessories need to be as per the specifications issued by the Authority for this purpose. The Authority while processing the information/data collected at the enrolment centre and uploaded to Central Identities Data Repository (CIDR), pursuant to regulation 13 and 14 of the Aadhaar (Enrolment and Update) Regulations, 2016 read with code of conduct as set out in Schedule V, may reject an enrolment or update request due to quality or any other technical reason, in the course of checking by UIDAI for quality of information/data collected (hereinafter referred as ‘QC process’). In case the request is rejected the QC process, it is marked with applicable error category.

5.1.1 The list of error categories, along with the nature of violation of any regulation, process, standard, guideline or order is at Annex I. Based on the type and count of errors marked during QC process, UIDAI generates a Registrar-wise data quality and deficiency report (DQDR) on a monthly basis or otherwise. The DQDR forms the basis for action as specified in Annex II to be taken for violation of any regulation, process, standard, guideline or order.

5.2 Sub-section (l) of section 23 of the Act empowers the Authority to call for information and records, conduct inspections, inquire and audit the operations of the CIDR, Registrars, enrolling agencies and other agencies. Non-adherence to or violation of any regulation, process, standard, guideline or order may also be established through such calling for information and records, inspections, inquiry and audit as follows:

- (a) UIDAI has put in place a system of Out Bound Dialling (OBD) survey to collect feedback from the individuals on the Aadhaar enrolment and update services availed by them. Grievances pertaining to overcharging and corrupt practices by a Registrar, enrolment agency, service provider or other person are also investigated by UIDAI through the system of OBD survey.

- (b) UIDAI also performs various checks at the backend to detect violations relating to bypassing of or tampering with the enrolment software.
- (c) Physical audit and inspections of the enrolment centres are conducted through Regional Offices and other means to monitor the activities of the Registrars, enrolling agencies, operators, supervisors and other personnel associated with enrolment and update.

5.2.1 In case any violation of any regulation, process, standard, guideline or order as set out in Schedule V or any other provisions of the Aadhaar (Enrolment and Update) Regulations, 2016 is identified through calling for information and records, inspections, inquiries and audit, action as specified in Annex III shall be initiated against the Registrar, and operator concerned, which can be in addition to the action already taken for violations as mentioned in paragraph 5.1.1.

6. Procedure for imposition of financial disincentives on Registrars

6.1 UIDAI generates — (i) consolidated Registrar-wise Aadhaar generation (AG) report, (ii) detailed EID-wise report of successful and unsuccessful transactions, and (iii) DQDR on monthly basis or otherwise and shares the same with the Registrars.

6.2 All the Registrars are mapped to any one of the UIDAI Regional offices (RO) for administrative purpose. On receipt of the above reports along with calculations, every Registrar concerned shall submit to the RO concerned a tax invoice if registered under GST or an invoice if not registered under GST, for processing of payment for the month or otherwise.

6.3 The total amount of financial disincentives on account of violations specified in paragraph 5.1.1 for each calendar month or otherwise shall be capped at 10% of the amount of financial assistance due from UIDAI (excluding GST) for the corresponding period.

6.4 There shall be no capping on the amount of financial disincentives on account of the violations as mentioned in paragraph 5.2.1. In case the total amount of financial disincentives on account of such violations exceeds the amount of financial assistance due from UIDAI during the relevant month, the excess amount is liable to be recovered from the future payments.

7. Procedure for suspension of activities, cancellation of credentials, codes and permissions, and training and testing of operator

7.1 *Procedure in respect of violations specified in Annex II*

7.1.1 In the event of an operator exceeding any threshold specified in Annex II, UIDAI Technology Centre may suspend the activities of the operator concerned and permissions of the operator under intimation to the Registrar, enrolment agency and RO concerned. Further steps shall be taken by the Registrar as applicable and specified in **Annex II**.

7.2 Procedure in respect of violations specified in Annex III

- 7.2.1 In the event of an operator committing any violation as specified in Annex III, the RO concerned shall communicate the same to the UIDAI Technology Centre for the suspension of activities or the cancellation of the credentials, codes and permissions, or both, of such operator, and the Technology Centre shall give effect to the same, under intimation to the Registrar, enrolment agency and RO concerned. Further steps shall be taken by the Registrar as applicable and specified in **Annex III**.

8. Re-training and certification

- 8.1 Violation of any regulations, process, standards, guidelines or order by an operator in the course of carrying out the enrolment or update process is likely to result in rejection of the request or recording of inaccurate information in CIDR, or both, to the detriment of the individual undergoing such process or a requesting entity that may rely on such information, or both. Therefore, it is necessary that operators exercise due care and caution in the performance of their duties. While operators who commit a violation as is specified at serial number 1 in Annex II, or in Annex III, shall not be permitted to continue in the system, in respect of other violations, the operator concerned shall be provided opportunity for re-training and certification as follows:

- (a) Errors with error code DOE-1: On the first and second instances of an operator committing Document Error-1 (“DOE-1”) as specified in Annex II, an email alert shall be sent to the Registrar, enrolment agency and operator concerned. In case a third instance of such violation by such operator in the same month, the activities of the operator shall be suspended forthwith. Registrar will have the discretion to consider re-onboarding such operator after one month of such deactivation, on completion of re-training and certification through LMS portal of UIDAI. Upon receipt of request from the Registrar concerned, the RO concerned may re-onboard such operator.
- (b) Errors with error code -AL, DOE-2, DE, BE, RSV: On the 10th, 20th and 25th instances of an operator committing any of the errors namely, Abusive Language (“AL”), Document Error-2 (“DOE-2”), Demographic Error (“DE”), Biometric Error (“BE”), Rejection during Source Verification (“RSV) as specified in Annex II, an email alert shall be sent to the Registrar, enrolment agency and operator concerned. In case of 30th instance of such violation by such operator in the same month, the activities of the operator shall be suspended forthwith. Registrar will have the discretion to consider re-onboarding such operator after one month of such deactivation, on completion of re-training and certification through LMS portal of UIDAI. Upon receipt of request from the Registrar concerned, the RO concerned may re-onboard such operator.

- 8.2 In case an operator is re-onboarded after re-training and certification as described at paragraph 8.1(a) and 8.1(b) above, and the activities of such an operator is suspended again for any violation subsequently, he shall not be given the opportunity for undergoing re-training and re-onboarding within a period of 12 months from the date of such suspension.

8.3 The condition mentioned at paragraph 8.2 will not be applicable to regular Government employees working as Aadhaar operators under various State and Central Government Registrars.

9. Mechanism for reconsideration of the action taken against violations of regulations, processes, standards, guidelines, orders and the code of conduct

9.1 A Registrar, enrolment agency, service provider or other person aggrieved by any action taken pursuant to the instant policy may, within a period of 45 days from the date of receipt of communication in this regard, represent to the Deputy Director General (DDG) in charge of the RO concerned, for reconsideration of such action. In the case of an enrolment agency, service provider or other person, the submission of such representation shall be done through the Registrar concerned. Such DDG shall consider and decide the representation and shall cause the substance of such decision to be conveyed in writing to the representing Registrar or, through the Registrar concerned, to the representing enrolment agency, service provider or other person concerned, as the case may be. The decision so conveyed shall be final.

10. The instant policy supersedes the policy issued *vide* UIDAI's circular F. No. HQ-16024/2/2020-EU-I-HQ, dated 30.11.2022 and modified *vide* its circular bearing the said number, dated 03.10.2023 (hereinafter referred to as "superseded policy"). However, such supersession shall not affect—

- (a) any suspension of activities, credentials or codes or permissions cancelled, or other steps taken under the superseded policy;
- (b) any right, obligation or liability acquired, accrued or incurred under the superseded policy; or
- (c) any steps initiated under the superseded policy for the cancellation of credentials, codes or permissions, which may continue to be proceeded with under the superseded policy as if the instant policy has not come into effect:

Provided that where the operator whose activities were suspended for a period of one year under the superseded policy for a deficiency other than the deficiency listed at serial number 2 in the table below clause (xviii) of paragraph 4 of the said policy, such operator may, on successful completion of re-training and certification as referred to in paragraph 8 of the instant policy and if a request is made by the Registrar concerned in this regard, be re-onboarded before expiry of the said period of one year.

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Annex I

List of error categories along with nature of violation of regulations / processes / standards / guidelines / orders

S. No	Nature of violation of regulations / processes / standards / guidelines / orders	Error category
1	Photo on photo (POP) of the individual seeking enrolment/ update	POP
2	Document Error-1 (DOE-1) (a) Uploading of overwritten/tampered system generated documents issued by Central/State Governments (b) Uploading of photo of object/ screenshot/ picture etc. against document	DOE-1
3	Use of unparliamentarily language / abusive language in demographic details	AL
4	Document Error-2 (DOE-2) (a) Uploading of poor-quality document/scan (b) Uploading of blank document or document not as per list of supporting documents (c) Uploading of wrong document in the selected document type (d) Uploading of expired or outdated documents like DL, passport, electricity bill, post-paid telephone bill, water bill, etc. (if not otherwise specified) (e) Uploading of only one side of a document whose both sides required for validation (<i>e.g.</i> one side of voter id card is not valid for proof of address) or not uploading all the relevant pages of a document (f) Uploading of photoshop document or document generated from unauthorised website (g) Uploading of wrong relationship document (<i>e.g.</i> , relationship mentioned in the address part of the document as w/o, h/o, c/o, d/o, s/o etc. shall not be acceptable) (h) Uploading of photocopy of document (i) Uploading of invalid document (j) Uploading of document bearing correction fluid/overwriting/ cutting etc. without attestation by issuer	DOE-2
5	Demographic Error (DE) (a) Minor typographical errors or demographic data mismatch (b) Transliteration error (c) Wrong selection of gender type/ relationship type (d) Visible age/photo mismatch (e) Any other document or data entry mistakes not covered under DOE-1	DE
6	Biometric Error (BE) (a) Photo not captured as per guidelines (b) Biometric exception photo not captured properly (c) Photo not of the individual seeking Enrolment/Update	BE

	(d) Biometric exception photo not of individual seeking enrolment/ update	
7	Rejection during source verification at QC (RSV): Document found invalid during source verification	RSV
8	Rejection due to technical issues at UIDAI's end (TR)	TR

Annex II

**Action to be taken for violations of regulations, processes, standards, guidelines,
orders and the code of conduct provided in the Aadhaar (Enrolment and
Update) Regulations, 2016 as identified in the QC processes***

S. No.	Error category	Nature of violation of regulations / processes / standards / guidelines / orders	Action to be taken	Rate of financial disincentive
1	POP	Photo on photo (POP) of the individual seeking enrolment/ update	(1) Suspension of the activities of the operator concerned with email notification to operator/EA/Registrar concerned (2) Consider imposing financial disincentives on the Registrar	₹ 25,000 per packet
2	DOE-1	Document Error 1 (DOE-1) (a) Uploading of overwritten/tampered system generated documents issued by Central/ State Governments (b) Uploading of photo of object/ screenshot/ picture etc. against document	(1) Email notification to operator/EA/Registrar concerned on 1 st and 2 nd violation. (2) Suspension of the activities of the operator concerned on 3 rd violation within the month along with email notification to operator/EA/Registrar concerned. (3) Consider imposing financial disincentives on the Registrar	₹10,000 per packet
3	AL	Use of unparliamentarily language / abusive language in demographic details	(1) Email notification to operator/EA/Registrar concerned on 10 th , 20 th and 25 th violation. (2) Suspension of the activities of the	₹50 per packet

			<p>operator concerned on 30th violation within the month along with email notification to operator/EA/Registrar concerned.</p> <p>(3) Consider imposing financial disincentives on the Registrar</p>	
4	DOE-2	<p>Document Error-2 (DOE-2)</p> <p>(a) Uploading of poor-quality document/scan</p> <p>(b) Uploading of blank document or document not as per list of supporting documents</p> <p>(c) Uploading of wrong document in the selected document type</p> <p>(d) Uploading of expired or outdated documents like DL, passport, electricity bill, postpaid telephone bill, water bill, etc. (if not otherwise specified)</p> <p>(e) Uploading of only one side of a document whose both sides required for validation (e.g. one side of voter id card is not valid for proof of address) or not uploading all the relevant pages of a document</p> <p>(f) Uploading of photoshop document or document generated from unauthorized website</p> <p>(g) Uploading of wrong relationship document (e.g. relationship</p>	<p>(1) Email notification to operator/EA/Registrar concerned on 10th, 20th and 25th violation.</p> <p>(2) Suspension of the activities of the operator concerned on 30th violation within the month along with email notification to operator/EA/Registrar concerned.</p> <p>(3) Consider imposing financial disincentives on the Registrar</p>	₹ 50 per packet

		<p>mentioned in the address part of the document as w/o, h/o, c/o, d/o, s/o etc. shall not be acceptable)</p> <p>(h) Uploading of photocopy of document</p> <p>(i) Uploading of invalid document</p> <p>(j) Uploading of document bearing correction fluid/overwriting/ cutting etc. without attestation by issuer</p>		
5	DE	<p>Demographic Error (DE)</p> <p>(a) Minor typographical errors or demographic data mismatch</p> <p>(b) Transliteration error</p> <p>(c) Wrong selection of gender type/ relationship type</p> <p>(d) Visible age/photo mismatch</p> <p>(e) Any other document or data entry mistakes not covered under DOE-1</p>	<p>(1) Email notification to operator/EA/Registrar concerned on 10th, 20th and 25th violation.</p> <p>(2) Suspension of the activities of the operator concerned on 30th violation within the month along with email notification to operator/EA/Registrar concerned.</p> <p>(3) Consider imposing financial disincentives on the Registrar</p>	₹50 per packet
6	BE	<p>Biometric Error (BE)</p> <p>(a) Photo not captured as per guidelines</p> <p>(b) Biometric exception photo not captured properly</p> <p>(c) Photo not of the individual seeking Enrolment/Update</p> <p>(d) Biometric exception photo not of individual seeking enrolment/ update</p>	<p>(1) Email notification to operator/EA/Registrar concerned on 10th, 20th and 25th violation.</p> <p>(2) Suspension of the activities of the operator concerned on 30th violation within the month along with email notification to operator/EA/Registrar concerned.</p> <p>(3) Consider imposing financial disincentives on the Registrar</p>	₹1,000 per packet

7	RSV	Rejection during source verification at QC (RSV): Document found invalid during source verification	(1) Email notification to operator/EA/Registrar concerned on 10 th , 20 th and 25 th violation. (2) Suspension of the activities of the operator concerned on 30 th violation within the month along with email notification to operator/EA/Registrar concerned. (3) Consider imposing financial disincentives on the Registrar	₹ 250 per packet
8	TR	Rejection due to technical issues at UIDAI's end (TR)	—	—

**Without prejudice to any other action which may be taken under the Act.*

Note: In case of multiple errors in a single packet, the error with higher amount of financial disincentive to be marked.

Annex III

Action to be taken for violations of regulations, process, standards, guidelines, orders and the code of conduct provided in the Aadhaar (Enrolment and Update) Regulations, 2016 as identified through other sources or means**

S. No.	Incident / criteria	Action	Rate of financial disincentive
1	Enrolment of adult as a child with age less than five years to avoid collection of biometric	(1) Suspension of the activities of the operator concerned (2) Consider imposing financial disincentives on the Registrar (3) Registrar may file FIR on the operator and shall be reviewed in the SRC meeting	₹ 25,000 per incident
2	Gross violation of the stipulated guidelines such as tampering of UIDAI's software/ Hardware (BYPASS of operator /supervisor Biometrics)	(1) Suspension of the activities of the operator concerned (2) Consider imposing financial disincentives on the Registrar	₹ 25,000 per machine
3	Enrolment of an adult as a child with age less than 18 years to	(1) Suspension of the activities of the operator concerned	₹ 25,000 per incident

	avoid individual's verification	(2) Consider imposing financial disincentives on the Registrar (3) Registrar may file FIR on the operator and shall be reviewed in the SRC meeting	
4	Wrong capturing of biometrics such as capturing reverse biometrics, toes instead of fingerprints, reverse iris etc.	(1) Suspension of the activities of the operator concerned (2) Consider imposing financial disincentives on the Registrar (3) Registrar may file FIR on the operator and shall be reviewed in the SRC meeting	₹ 25,000 per incident
5	Capturing of mixed biometrics	(1) Suspension of the activities of the operator concerned (2) Consider imposing financial disincentives on the Registrar (3) Registrar may file FIR on the operator and shall be reviewed in the SRC meeting	₹ 25,000 per incident
6	Capturing of biometrics using gummy fingers	(1) Suspension of the activities of the operator concerned (2) Consider imposing financial disincentives on the Registrar (3) Registrar may file FIR on the operator and shall be reviewed in the SRC meeting	₹ 25,000 per operator
7	Operating unauthorised enrolment center/ operating from unauthorised location	(1) Suspension of the activities of the operator concerned (2) Consider imposing financial disincentives on the Registrar	₹ 25,000 per operator
8	Overcharging for Aadhaar enrolment and update services/ involvement in corrupt practices	(1) Suspension of the activities of the operator concerned (2) Consider imposing financial disincentives on the Registrar	₹ 25,000 per operator
9	Wrong capturing of biometrics as biometric exception case	(1) Suspension of the activities of the operator concerned (2) Consider imposing financial disincentives on the Registrar (3) Registrar may file FIR on the operator and shall be reviewed in the SRC meeting	₹ 25,000 per packet
10	Identified for non-displaying of rate chart, available services or/and list of documents at	(1) Issue notice to Registrar with details and proof for corrective action within one	₹ 1,000 per incident

	enrolment centres during inspection.	week (2) Consider imposing financial disincentives on the Registrar for non-compliance.	
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***Without prejudice to any other action which may be taken under the Act.*
