



Union Bank Officers Association (Kerala State)



Affiliated to AIUBOF & AIBOC, Reg. No. 124/87 (Re-Reg. No. TU19457)

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Letter No: UBOAKS/117/2025

10th June 2025

To,

The General Secretary
All India Union Bank Officers Federation

Dear Comrade,

Sub: Submission of Agenda for discussion in the Forthcoming Central ER Meeting

Please find enclosed herewith the list of additional issues proposed to be placed before the Management and AIUBOF during the forthcoming Central Employee Relations (ER) Meeting on behalf of the Kerala affiliate. Kindly note that these matters are supplementary to the earlier set of ER issues presently under deliberation, which remain unresolved as on date.

SL No	Issues
1.	<p><u>Gender-Discriminatory Lateral Transfers - Annual Transfer Exercise 2025-26</u></p> <p>It is a matter of serious concern that, despite continued opposition to lateral transfers by the Federation—recorded in several meetings and signed minutes—the Bank has once again implemented an arbitrary and irrational lateral transfer exercise in 2025-26. What is particularly objectionable is the discriminatory application of this policy based on gender. Male officers have been selectively transferred laterally, when the issue of female lateral transfers were sub-judice, rendering such selective and hasty actions all the more inappropriate and unlawful. We strongly urge the management to immediately reverse all male lateral transfers.</p>
2.	<p><u>Non-Consideration of Transfer Requests on Male Spouse Grounds - Despite DFS Guidelines and Bank Policy</u></p> <p>It is submitted that the Bank has failed to give due consideration to transfer requests submitted by male officers on spouse grounds, wherein the spouse is employed in the State or Central Government service. This continued non-compliance persists despite express directives issued by the Department of Financial Services (DFS) and the explicit incorporation of the same under Clause 5.3.5 of the Bank's Transfer Policy.</p>

	<p>While the facility for diarizing such requests has been duly made available through the Union Parivar Portal, genuine and eligible cases continue to be ignored or left unresolved, without any justified reason or explanation.</p> <p>It is further noted from the internal data that only around 200 such cases exist Bank-wide, and as such, no undue administrative hardship would arise in extending the legitimate relief sought. The continued inaction, therefore, amounts to a breach of Bank policy, a disregard of binding Government guidelines, and a denial of equal treatment and natural justice.</p> <p>In light of the above, we urge the Management and demand the immediate consideration and disposal of all such pending cases in accordance with the Transfer Policy and DFS instructions.</p>
3.	<p><u>Neglect of Extreme Compassionate and Medical Cases - Request Transfers</u></p> <p>Numerous transfer requests under extreme compassionate grounds—including cases falling under the Rights of Persons with Disabilities Act and Clause 10.2 of the Transfer Policy—have been denied.</p> <p>Many of these cases involve newly diagnosed, life-threatening conditions such as cancer and epilepsy, or terminal illness in immediate dependents. Regional and Zonal Offices have failed to forward or recommend these cases appropriately. Such inaction is inhumane, contrary to policy, and must be rectified without delay.</p>
4.	<p><u>Arbitrary Transfers of Marketing Officers</u></p> <p>The recent transfer exercise of Marketing Officers appears wholly mechanical and devoid of policy basis. Officers have been transferred across long distances—often without completing their tenure, and without consideration of any valid ground under the existing policy. Even legitimate requests made after completion of three years have been disregarded, while punitive transfers have been affected prematurely. The exercise lacks transparency, consistency, and rationale, and must be revisited comprehensively to address all genuine grievances.</p> <p>Illustratively, an officer presently posted in the Kottayam Region under the Ernakulam Zone – situated approximately 3,800 kilometres from Manipur, his home state – has been further transferred to Thiruvananthapuram, located at the extreme southern end of the country, notwithstanding the fact that he has not even completed two years at his current place of posting. This instance is not isolated; numerous such cases have been duly diarised with appropriate representations seeking modification and/or cancellation of the transfer orders, but the said requests have been summarily rejected without cogent justification.</p>

5.	<p><u>Appeal Module under Union Parivar - Procedural Gaps, Policy Violations & Urgent Need for Rectification</u></p> <p>The issue pertains to the recently launched Appeal Module for Transfer Orders under the Union Parivar portal, introduced via Staff Circular No. 100200-2025 dated 17.05.2025, pursuant to DFS advisory eF No. 4/1/2/2024-IR dated 26.11.2024.</p> <p>While the launch of the module is a welcome and long-awaited step toward transparency, it suffers from serious procedural and structural limitations that must be addressed for compliance with both the Bank’s Transfer Policy and the DFS guidelines.</p> <p><u>Incomplete Implementation - Grievance Mechanism Omitted</u></p> <p>Clauses 11.11 (Appeal) and 11.12 (Grievance) of the Bank’s Transfer Policy distinguish clearly between Appeals (for reconsideration in the absence of policy violation) and Grievances (where there is alleged violation of policy). However, the current module only allows for filing appeals, with no mechanism for officers to submit grievances under Clause 11.12. The absence of a grievance filing option violates the internal policy framework and deprives officers of a legitimate route to challenge policy breaches.</p> <p><u>No Forum for Officers Denied Transfer Orders Despite Eligibility</u></p> <p>The portal does not provide any facility for officers whose transfer requests—made on valid and documented grounds such as:</p> <ul style="list-style-type: none"> • completion of three years in a zone, • spouse grounds (including for male officers with spouses in government service), • compassionate and medical grounds— have not been considered or acted upon. <p>The denial of such requests, without justification or intimation, amounts to administrative opacity. Officers must be permitted to file appeals in such cases under Clause 11.11, as non-action can also constitute unfair treatment.</p> <p><u>Non-Issuance of Speaking Orders - Violation of DFS Guidelines</u></p> <p>As per Point J of the DFS advisory, reasoned, written orders (“speaking orders”) must accompany any rejection of a transfer request or appeal. Currently, officers receive no such communication, denying them the right to understand, address, or escalate their cases effectively. This lack of transparency contravenes both regulatory direction and principles of natural justice.</p> <p><u>Limited Applicability - Discriminatory Exclusion of Earlier Transfers</u></p>
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	<p>The module is applicable only to transfer orders issued on or after 17.05.2025. Consequently, officers affected by earlier decisions—including many male officers who were transferred arbitrarily prior to this date—are excluded. This post-facto rollout nullifies the very purpose of the DFS advisory and undermines the rights of aggrieved officers.</p> <p>In light of the above, we urge the Federation to take up the matter with Central Office - HR and press for the following corrective measures:</p> <ol style="list-style-type: none"> 1. Inclusion of Grievance Filing Option (Clause 11.12) 2. Appeal Facility for Denied Requests 3. Issuance of Speaking Orders 4. Retrospective Applicability of the Module
6.	<p><u>Non-Consideration of Eligible Request Transfers</u></p> <p>It has come to our attention that multiple officers who had duly submitted their transfer requests via the “Union Parivar” portal and who have completed over four years in their current zones have been unjustly excluded from the transfer orders. While officers in select zones (e.g., Ernakulam, Chennai, Coimbatore, Mangalore, Vijayawada, Visakhapatnam, Hyderabad) have been transferred, officers similarly situated in other zones (including Bangalore, Chandigarh, Jaipur, Delhi, Pune, Bhopal, Bhubaneswar, and many other zones in the East and West) have been arbitrarily denied repatriation.</p> <p>Such partial, incomplete, and regionally skewed implementation renders the entire transfer exercise manifestly arbitrary, violative of administrative fairness, and repugnant to the policy of equitable manpower deployment.</p>
7.	<p><u>Violation of DFS Guidelines and Transfer Policy: Arbitrary Postings Outside Linguistic Zones</u></p> <p>Clause 5.4.4 of the Bank’s Transfer Policy, read in conjunction with the binding directives of the Department of Financial Services (DFS), mandates that officers—particularly up to Scale III—shall, as far as practicable, be posted within their respective linguistic zones. This is not a mere procedural guideline but a policy obligation rooted in service efficiency, equity, and public interest. Despite this clear mandate, the Bank continues to effect transfers in stark contravention of the said norms. Officers are posted to non-linguistic regions, even when vacancies exist within their home linguistic zones. In many instances, officers from a linguistic region are displaced, only to be replaced by officers from other linguistic backgrounds—an act that directly subverts both the letter and spirit of the DFS guidelines and Transfer Policy.</p> <p>This issue was specifically raised by the All India Union Bank Officers’ Federation (AIUBOF) during the last Central Employee Relations Meeting. Although Management assured that sincere efforts would be made to ensure postings within linguistic zones, continued violations render such assurances illusory.</p>

	<p>Moreover, the Bank's own recruitment of Local Based Officers (LBOs) is a clear recognition that certain regions constitute distinct linguistic zones requiring officers proficient in the local language. Transfers made in disregard of this logic—particularly from areas identified for LBO recruitment—are inconsistent, discriminatory, and fundamentally violative of established policy.</p> <p>The Management shall immediately undertake a comprehensive review and field-level survey to ascertain the number and particulars of officers presently deployed in non-linguistic zones, and shall, without further delay, initiate appropriate steps to facilitate the retransfer of such officers to their respective linguistic regions.</p>
8.	<p><u>Deduction of Perquisite Tax on Concessional Rate of Interest - Unwarranted Burden on Employees</u></p> <p>Pursuant to the judgment of the Hon'ble Supreme Court, the Bank has initiated deductions under the head of <i>Perquisite Tax</i> in respect of concessional rate of interest availed by employees on staff loans. The said deductions have been unilaterally enforced, disregarding the well-established <i>Debtor-Creditor</i> relationship between the Bank and its employees, and in violation of the express terms and conditions governing the sanction of such staff loans.</p> <p>Despite earlier representations and even invocation of the writ jurisdiction of the Hon'ble High Court of Kerala, the Bank continues to abrogate its responsibility and unjustly impose the tax burden on employees.</p> <p>In this regard, the following representations are made for immediate consideration and redressal:</p> <ol style="list-style-type: none"> 1. That the Bank ought to bear the perquisite tax liability arising from concessional rate of interest extended to employees, in parity with the established practice followed by peer institutions such as Canara Bank and Bank of Baroda. The corresponding <i>Tax Deducted at Source (TDS)</i>, if borne by the Bank, must be duly remitted against the Permanent Account Number (PAN) of the respective employees. 2. That the benchmark rate adopted for determination of notional perquisite value is erroneously derived from the State Bank of India's website, without accounting for the concessional and reduced rates offered to the general public. Consequently, the computed TDS is inflated and does not reflect the actual differential. Furthermore, SBI has not published the <i>External Benchmark Lending Rate (EBLR)</i> reflecting the recent downward revision of the monetary policy, wherein the EBLR stands reduced from 8.90% to 8.15%, causing excessive tax deductions. It is therefore imperative that SBI be directed to disclose the revised and applicable EBLR in compliance with regulatory norms, so as to enable fair and correct computation of perquisite tax.

9.	<p>Discontinuation of Physical Security and Fire Safety Policy</p> <p>It is brought to attention that the Bank, vide Security Circular No. 101 dated 18.03.2025, has unilaterally discontinued the <i>Physical Security and Fire Safety Policy</i>. The said circular stipulates that:</p> <p>“Bank has decided to discontinue publishing of Physical Security and Fire Safety Policy hereinafter. In lieu, guidelines in the form of Security Circulars / Letters on the subjects related to physical security and fire safety of the Bank shall be issued as and when requirement arises.”</p> <p>This abrupt policy withdrawal raises serious concerns regarding uniformity, standardization, and regulatory compliance, particularly in the absence of a consolidated and codified policy framework governing critical areas of physical security and fire safety. It is pertinent to note that Paragraph 16.1.1 of the erstwhile Policy, dealing with specifications of strong rooms, had earlier been superseded vide Security Circular No. 98 dated 25.07.2024, thereby permitting construction of RCC strong rooms in lieu of Modular Panel Vaults (MPVs).</p> <p>In the absence of a cohesive and binding policy document, a fragmented approach through ad hoc circulars not only undermines security preparedness but also jeopardizes operational accountability and audit compliance.</p>
10.	<p>Mandatory Audio Recording Feature in CCTV Systems and Privacy Concerns</p> <p>Further, the Bank, through Security Circular No. 100 dated 03.01.2025, has mandated, under Para 2 of its Annexure, that:</p> <p>“Facility to record audio is mandatory” for cameras installed in branches and offices as part of the Bank’s CCTV surveillance infrastructure.</p> <p>The Bank has also commenced the implementation of a Centralized Monitoring System (CMS) with a 24x7 Control Centre at Central Office Annex, Mangalore, for real-time surveillance and monitoring. Approximately 2,000 sites—including branches and ATMs—in Odisha, Andhra Pradesh, and Karnataka have been earmarked for Phase-I rollout (with over 300 sites completed). This system incorporates audio recording functionality, enabling the recording of all verbal communications occurring within the surveillance zone.</p> <p>While the objective of enhanced security is acknowledged, the introduction of audio surveillance raises significant legal, ethical, and privacy concerns, especially in the absence of express informed consent of employees and customers. The continuous audio recording of conversations—potentially involving sensitive customer data, internal deliberations, and privileged interactions—may violate established norms under the <i>Information Technology Act, 2000</i>, and <i>Right to Privacy</i> as upheld by the Hon’ble Supreme Court in <i>Justice K.S. Puttaswamy (Retd.) v. Union of India</i>.</p>

	<p>We urge</p> <ol style="list-style-type: none"> 1. That the Bank undertake a comprehensive legal review of the audio recording mandate, and issue explicit SOPs and safeguards addressing consent, data storage, access, and privacy obligations in compliance with prevailing laws. 2. That the implementation of CMS with audio capabilities be kept in abeyance or suitably modified, pending such review and requisite approvals from competent statutory/regulatory authorities.
11.	<p><u>Inordinate Delays, Rejections, and Repudiations in IBA Medical Insurance Scheme</u></p> <p>It is a matter of grave concern that officers are increasingly facing undue hardship on account of claim rejections, repudiations, and inordinate delays in claim settlements under the IBA Medical Insurance Scheme. The primary cause of such adversity appears to be the grossly irresponsible and arbitrary functioning of the Third-Party Administrator (TPA), whose conduct remains unregulated and unaccountable.</p> <p>Despite recurring grievances, the process for escalation and redressal remains ineffective and opaque. The absence of a structured grievance redressal mechanism and lack of control or oversight over the TPA's actions have led to an alarming rise in unjust claim denials. Officers are neither adequately guided on the process of appeal nor informed of their rights, leading to financial losses and mental distress.</p> <p>In light of the foregoing, we urge that the following immediate measures be undertaken:</p> <ol style="list-style-type: none"> 1. A comprehensive review of the functioning of the TPA be conducted, with specific focus on the rate of claim rejections and repudiations, and the rationale thereof. 2. An audit of Turn-Around Time (TAT) for various categories of claims - including cashless claims, domiciliary claims, and reimbursement claims - be undertaken to identify procedural delays and inefficiencies. 3. All officers be duly informed and guided on the proper process to file, appeal, and follow up on their insurance claims, including the grounds and procedure for challenging arbitrary repudiations. <p>Unless these corrective steps are taken with urgency, the continued mismanagement by the TPA shall result in erosion of trust in the scheme and further loss to officers.</p>
12.	<p>Deployment of Relationship Managers Under Project LEAP - Denial of Finacle Access and Staff Shortage</p> <p>The matter concerning the deployment and operational challenges of Relationship Managers (RMs) under <i>Project LEAP</i> has been the subject of</p>

	<p>extensive deliberation between the AIUBOF and the Bank's Management. The issue was specifically recorded as Point No. 41 in the minutes of the most recent Employee Relations (ER) meeting. Despite repeated representations and threadbare discussions, the matter remains unresolved to date.</p> <p>Presently, while the Bank is facing an acute shortage of officer staff, with estimates indicating a deficit of nearly 1,500 officers, a significant number of officers have been deployed as RMs under Project LEAP. These officers have been denied access to the Bank's core banking system (Finacle ID), thereby severely restricting their ability to discharge regular banking duties and compromising the optimal utilization of their services.</p> <p>In light of the operational exigencies and human resource constraints, it is imperative that the current arrangement be reviewed on priority. Officers posted as Relationship Managers must be restored with their Finacle access credentials and permitted to perform all functions akin to regular officers, so as to ensure administrative efficiency, equitable workload distribution, and service continuity in branches.</p>
13.	<p>Non-Issuance of SOP for Official WhatsApp Groups Despite Binding Agreement</p> <p>It is submitted that the matter concerning the regulation of official WhatsApp groups was mutually deliberated and resolved between AIUBOF and the Bank's Management, culminating in the signing of formal minutes of understanding in December 2024. This agreement, executed in the presence of the Chief Labour Commissioner (CLC), carries binding effect upon both parties.</p> <p>As per the said agreement, it was explicitly resolved that:</p> <ul style="list-style-type: none"> • A Standard Operating Procedure (SOP) governing the creation and operation of official WhatsApp groups shall be promulgated; • The said SOP shall be issued as a Staff Circular, and not as an internal directive to Regional or Zonal Heads; • There shall be a maximum of two official WhatsApp groups per administrative unit – one for Branch Heads and one for Deputy Branch Heads; • The SOP shall contain express provisions relating to: <ul style="list-style-type: none"> ○ Timings for posting and interacting within such groups; ○ The nature and scope of permissible communication; ○ Guidelines on professional conduct and adherence to the Bank's Code of Conduct within such virtual forums. <p>Despite the passage of over six months since execution of the minutes, the Management has failed to issue the agreed SOP, thereby violating the terms of a duly signed and binding understanding arrived at through conciliation under the auspices of the Chief Labour Commissioner.</p>

	<p>In light of the above, it is earnestly urged that the Bank immediately issue the SOP in the form of a Staff Circular, strictly adhering to the mutually agreed terms, and thereby uphold the sanctity of bipartite agreements and industrial peace.</p>
14.	<p>Non-Issuance of Revised Guidelines for HR Suvidha Despite Binding Agreement</p> <p>It is submitted that the issue relating to the functioning and procedural shortcomings of the HR Suvidha platform, particularly in respect of the sanction of Travelling Expenses (TE) and related approvals, was comprehensively deliberated and mutually resolved between AIUBOF and the Bank's Management during the bipartite meetings held in December 2024.</p> <p>Pursuant to the said discussions, a Small Committee was constituted, which engaged in detailed deliberations and proposed a series of modifications. These proposals were mutually accepted and finalized, and the same were duly minuted as part of a binding agreement concluded in December 2024.</p> <p>Notwithstanding the passage of over six months, the revised guidelines for HR Suvidha have not been issued, thereby frustrating the resolution arrived at through structured bipartite dialogue. The said matter continues to remain unresolved, and seen flagged under Point Nos. 3, 24, 30, and 50 in last Employee Relations (ER) meetings.</p> <p>In view of the above, we urge the Management to immediately issue the revised guidelines for HR Suvidha, in conformity with the agreed terms of the December 2024 settlement, and to address all outstanding issues, particularly those concerning the sanction, processing, and disbursal of Travelling Expenses (TE), in a time-bound and transparent manner.</p>

Regards



Sreenath Induchoodan
General Secretary