



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/123/2025

12th September 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 -
Quarter Ending - Sep 2025 - reg**

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.

Sl. No	Issues
1.	<p><u>Acute Staff Shortage in Branches and Urgent Need for Recruitment</u></p> <p>Time and again, we have consistently highlighted the serious and acute staff shortage being experienced at the branch level. While it is understood that manpower planning is carried out centrally and postings are based on the deployment model prepared by CDD HR, Central Office, the current approach does not adequately account for practical ground realities.</p> <p>The sanctioned or normalized officer strength is often derived in a mechanical manner, without considering circumstantial factors such as:</p> <ul style="list-style-type: none"> • Availability of clerical staff, including Head Cashiers and Customer Service Associates; • Local workload variations; • The need for officers to handle both supervisory and operational responsibilities.

	<p>For example, if manpower planning prescribes only one Branch Manager and one officer for a branch that has neither a Head Cashier nor a Customer Service Associate, the arrangement becomes unworkable. In such cases, one officer is compelled to manage cash while the Branch Manager is forced to sit at a counter—seriously undermining supervisory functions, customer service, and compliance.</p> <p>It is evident that the current manpower model does not reflect the actual operational requirements of branches.</p> <p>Our Submissions and Demands:</p> <ol style="list-style-type: none"> 1. Urgent Recruitment of Officers <ul style="list-style-type: none"> ○ Immediate recruitment of Local Banking Officers (LBOs) based on a thorough demographic study to ensure equitable distribution of staff. ○ In addition, the normal IBPS recruitment of General Banking Officers must also be undertaken to address the shortage sustainably. 2. Clerical Recruitment <ul style="list-style-type: none"> ○ Adequate recruitment of clerical staff to ensure sufficient award staff strength in branches. ○ This is essential to prevent officers from being overburdened with clerical responsibilities, which affects both efficiency and morale. <p>While the recruitment of 500 Specialist Officers is acknowledged, they have not been deployed to branches. Their presence has not eased the acute shortage at branch level. Specialist recruitment should supplement, not replace, general officer and clerical staffing needs.</p> <p>We urge the management to urgently address the staffing crisis by revisiting the manpower planning approach, and by initiating immediate recruitment drives for LBOs, General Banking Officers, and clerical staff. This will ensure branches are adequately staffed to discharge their responsibilities effectively, improve customer service, and restore officer morale.</p>
2.	<p><u>Dual Shortlisting Mechanism in Promotion Policy SC 8371 Causing Unfair Exclusion of Eligible Candidates</u></p> <p>In the current promotion policy SC 8371, a system of ranking has been introduced for promotions from Scale IV to Scale V. Under this system, for the limited purpose of shortlisting candidates for the interview, job responsibility marks and performance appraisal marks are added along</p>

	<p>with other parameters (excluding GD/Interview marks). Candidates are then ranked in descending order, and only five times the number of vacancies are called for the interview from this rank list.</p> <p>This mechanism introduces a premature shortlisting process prior to the GD/Interview stage. As a result, officers who may have performed well in the written examination are denied the opportunity to participate in the interview, since the addition of performance appraisal and job responsibility marks at this stage excludes them.</p> <p>By contrast, under the earlier promotion policy SC 8028, all candidates who cleared the written examination were permitted to attend the interview. The final ranking and shortlisting occurred only after the interview stage, thereby giving all eligible officers a fair and reasonable opportunity to present themselves.</p> <p>The revised system under SC 8371 effectively introduces two levels of shortlisting—first before the interview and again at the final stage—resulting in undue prejudice to candidates. This restricts their rightful chance to present their capabilities and does not align with principles of fairness and equal opportunity.</p> <p>It is submitted that the interim shortlisting process prior to the interview stage be removed, and that all candidates who qualify in the written examination be allowed to participate in the interview process, ensuring a transparent and equitable system.</p>
3.	<p>Incomplete Proactive Disclosures under RTI Act and Need for Broader Transparency in Transfer Matters</p> <p>The proactive disclosure of officers' salary under the RTI Act is acknowledged; however, this measure represents only partial compliance with the obligations envisaged under Section 4(1)(b)(x) of the Right to Information Act, 2005 ("RTI Act"). The present disclosure appears selective and does not comprehensively address the full range of statutory duties imposed upon public authorities.</p> <p>Further, Section 4(2) of the RTI Act casts a continuing obligation on every public authority to suo motu disseminate as much information as possible through accessible channels, including the internet, thereby minimizing the need for the public to resort to individual RTI applications.</p> <p>In line with these statutory requirements and principles of transparency, equity, and administrative fairness, the following measures are respectfully suggested:</p>

	<ol style="list-style-type: none"> 1. Restoration of Consolidated Transfer Orders - Reinstate the established practice of publishing consolidated transfer orders to ensure consistency with principles of service jurisprudence and fair administration. 2. Disclosure of Key Transfer-Related Information - In the interest of transparency and to strengthen trust in the system, the following may be proactively disclosed: <ul style="list-style-type: none"> ○ All transfer requests received; ○ All transfer orders issued under the Annual Transfer Policy; ○ Lateral transfer orders issued during the year; ○ List of officers exempted from tenure norms, along with reasons for such exemptions. <p>Such measures would significantly enhance transparency, reinforce officers' trust in the system, reduce avoidable grievances and litigations, and serve the larger public interest given the frequency of complaints regarding policy violations.</p> <p>It is submitted that management shall kindly consider extending proactive disclosures to cover the above areas, thereby ensuring full compliance with the RTI Act and strengthening the culture of fairness and accountability.</p>
4.	<p><u>Inadequate Disposal of Grievances through Union Parivar Portal</u></p> <p>We acknowledge and thank the management for addressing the issue raised in the last ER Meeting regarding the Appeal Module in Union Parivar and the non-compliance in considering grievances under the transfer policy. The introduction of the Grievance Redressal Portal in Union Parivar is indeed a positive step, and we understand that nearly 2,500 grievances were submitted through the platform.</p> <p>However, it is unfortunate to note that almost all grievances (barring fewer than 100) have been disposed of with a one-line response within the portal, stating merely that <i>"the committee has considered the grievance and it is not eligible as a grievance in violation of the transfer policy under clause 11.12."</i> Such responses, without speaking orders or detailed reasoning, do not reflect due consideration and give an impression of evasive replies and non-application of mind.</p> <p>This approach has resulted in genuine grievances being ignored, including those based on compassionate grounds that are expressly permitted under the transfer policy. By blanketly citing clause 11.12, officers' legitimate concerns are being rejected without examination, which undermines confidence in the fairness and seriousness of the grievance redressal process.</p>

	<p>Given that the Executive Director (HR) is responsible for constituting the committee and overseeing the process, such perfunctory disposal of grievances casts a shadow on the credibility of the HR Department and the management's commitment to fair redressal.</p> <p>We respectfully urge that grievances be considered with due diligence, and that reasoned, speaking orders be issued for each decision, whether acceptance or rejection. This will not only instil confidence among officers but also strengthen the transparency and credibility of the system.</p>
SL No	Pending 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>Non-Consideration of Transfer Requests on Male Spouse Grounds - Despite DFS Guidelines and Bank Policy</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</p>

	<p>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 diarized 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>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>
6.	<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.</p> <p>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</p>

	<p>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>
7.	<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

	<p>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.</p>
8.	<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>
9.	<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</p>

	<p>(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.
10.	<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>
11.	<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>
12.	<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