ALL INDIA STATE BANK OFFICERS' FEDERATION
(Registered under the Trade Unions Act 1926, Registration No: 727/MDS)
Central Office: State Bank Buildings, St. Mark's Road, Bangalore-560 001
Registered Office: 22, Rajaji Salai, Chennai- 600 001

CIRCULAR NO. 47/2026 **Date: 17/04/2026**

TO ALL OUR AFFILIATES

Representation against penal and adverse service actions imposed on officers without compliance with the SBI Officers' Service Regulations

We have sent a communication to the Deputy Managing Director (HR) & Corporate Development Officer, State Bank of India, Corporate Centre, Mumbai-400021, on the captioned subject.

The content of the communication is reproduced below.

With Greetings,

Yours Comradely,

(Rupam Roy)
General Secretary

Letter No. 6571/12/2026 **Date: 17.04.2026**

The Deputy Managing Director (HR) & CDO
State Bank of India
Corporate Centre,
Mumbai – 400021.

Dear Sir,

Representation against penal and adverse service actions imposed on officers without compliance with the SBI Officers' Service Regulations

The All India State Bank Officers' Federation (AISBOF) respectfully submits this representation on behalf of officers across the country who have been subjected to recovery of reimbursements, including 5-in-1 reimbursements, deduction of mandatory learning marks, denial of AAA grading and consequential obstruction of promotion on the basis of AI-generated observations arising out of remote-proctored Mandatory Learning examinations, and in a significant number of cases even after the concerned officers were directed to reappear in reassessment and successfully cleared the same. The Federation is instructed that these actions have affected approximately 400 officers, including more than 100 officers who were otherwise in the zone of consideration for promotion, and that the adverse consequences have been imposed before the conclusion of any disciplinary process contemplated by the governing Service Regulations.

AISBOF respectfully submits that the impugned course is not merely harsh in effect but is fundamentally inconsistent with the SBI Officers' Service Regulations themselves. Rule 66 makes it clear that a breach of the conduct provisions constitutes misconduct punishable under Rule 67. Rule 67, in turn, exhaustively identifies the penalties that may be imposed on an officer for misconduct or for any other good and sufficient reason to be recorded in writing, and those penalties include, inter alia, withholding of promotion, recovery from pay or from any other amount due, and imposition of fine or monetary penalty. Once the Bank proceeds on the footing that the officer has allegedly indulged in unfair means or other misconduct, the matter necessarily enters the field of disciplinary law under the Regulations, and the consequences flowing therefrom must therefore be traceable to Rule 67 and imposed only through the procedure recognized by Rule 68. There is no warrant in the Regulations for a parallel or informal regime under which an officer may be visited with financial loss, adverse appraisal consequences or promotional disability outside the discipline-and-appeal framework.

The recovery of reimbursements is, in substance as well as under the text of Rule 67, penal in character, because Rule 67 expressly treats recovery from pay or from any other amount due and imposition of fine or monetary penalty as recognized penalties. Likewise, if the denial or withholding of promotion is founded on the allegation of misconduct, it answers directly to Rule 67(c). Even where deduction of mandatory learning marks or denial of AAA grading is sought to be described as merely administrative, those measures cannot escape scrutiny under the Regulations when they are imposed as consequences of an alleged act of wrongdoing and when they carry direct civil consequences affecting record, appraisal and advancement. What the Regulations do not permit directly as an un-enumerated penalty cannot be achieved indirectly by attaching a different administrative label to what is, in effect, punishment without adjudication.

Rule 68 lays down the only lawful pathway for disciplinary action. Where withholding of promotion or any major penalty is proposed, Rule 68(2)(i) requires that no such order be made except after an inquiry held in accordance with that sub-rule. Even in the case of minor penalties, Rule 68(4) mandates that the officer must be informed in writing of the imputations of misconduct or misbehaviour and afforded an opportunity to submit a written defence before orders are passed. The structure of Rule 68 is deliberate and complete: the disciplinary authority must first form its opinion that grounds exist for inquiring into the truth of an imputation; definite and distinct articles of charge must then be framed; the officer must be furnished with the statement of allegations and given adequate time to submit defence; where charges are denied, the prescribed inquiry, consideration of evidence, hearing and report must follow; and only thereafter can the competent authority pass an order in accordance with law. In the present matter, the affected officers have, in substance, already been punished without first being served with a proper charge-sheet, without a statement of imputations in the manner contemplated by Rule 68, without inquiry, without opportunity to test the material relied upon, and without a reasoned finding of guilt by the competent disciplinary authority. Such a course is ex facie contrary to Rule 68 and is therefore ultra vires the Service Regulations.

The further illegality in the matter is that the impugned actions invert the very logic of disciplinary jurisprudence. The Regulations embody the principle that an allegation must first be examined through due process and only thereafter can penal consequences follow. Here, however, financial recovery, adverse grading, deduction of marks and promotional prejudice have preceded adjudication. That amounts to pre-judgment. Once the officer is made to suffer the consequences of guilt before the disciplinary mechanism has even run its course, any subsequent proceeding is reduced to a formal exercise. The principle of Audi Alteram Partem is not external to the SBI framework; it is built into Rule 68 itself. The affected officers cannot lawfully be condemned first and heard later.

AISBOF further submits that the exclusive or decisive reliance on AI-flagged anomalies cannot cure the procedural defect. At the highest, an algorithmic observation may furnish a basis for preliminary verification. It cannot, by itself, become proof of misconduct or a substitute for the process prescribed by the Service Regulations. AI-generated suspicion cannot replace a human determination by the competent authority; it cannot substitute for disclosure of the material relied upon; it cannot displace the officer's right to explain, rebut and defend; and it cannot justify the immediate imposition of pecuniary or career consequences. If such observations are treated as conclusive at the threshold, the protections written into Rule 68 become meaningless.

The contradiction becomes even more pronounced in those cases where the officers were directed by the Bank itself to reappear for reassessment and thereafter successfully cleared the reassessment. Once the Bank created a reassessment mechanism and the officers complied with it successfully, the continuation of punitive consequences on the basis of the earlier suspicion becomes wholly arbitrary and internally inconsistent. At the very least, successful reassessment destroys the premise that guilt can be presumed at the threshold and certainly renders it impermissible to continue recovery, adverse grading, mark deduction and promotional prejudice as though the alleged misconduct already stands established. To preserve the stigma and the punishment even after satisfactory reassessment is to treat the reassessment as meaningless when it favours the officer, while treating the initial AI flag as conclusive when it goes against him. Such an approach cannot be reconciled either with fairness or with the Service Regulations.

AISBOF is conscious that the explanation to Rule 67 states that reserving or postponing promotion for reasons such as completion of promotion requirements or pendency of disciplinary proceedings does not amount to a penalty. However, that saving cannot be pressed into service in the present case to legitimize what is otherwise punitive action. It presupposes a lawful basis under the Regulations, including the actual pendency of disciplinary proceedings in the manner known to law. It does not authorize the Bank to first inflict recovery, downgrade evaluation, deduct marks and cast a cloud over the officer's record and then characterize the resulting career prejudice as a mere administrative postponement. Nor can "unsuitability" be presumed from an untested allegation that has never been examined through the Rule 68 procedure.

In these circumstances, AISBOF most respectfully requests your immediate intervention so that all adverse actions already taken against the affected officers, including recovery of reimbursements, deduction of mandatory learning marks, denial of AAA grading and consequential promotional prejudice, are forthwith withdrawn, or at the very least kept in abeyance, until disciplinary proceedings, if any, are lawfully initiated and concluded strictly in accordance with Rules 66, 67 and 68 of the SBI Officers' Service Regulations; that in all cases where officers were directed to undergo reassessment and have successfully cleared the same, the pending stigma and punitive consequences be withdrawn in the absence of any adjudicated finding of misconduct; that promotion cases of the affected officers be processed in accordance with the Regulations and not blocked on the basis of unproven allegations or AI-generated suspicion; and that the Bank issue appropriate internal directions clarifying that no officer shall suffer pecuniary, appraisal-related or promotional prejudice by reason of an allegation of misconduct except in the manner expressly authorized by the Service Regulations and after compliance with the due process contained therein.

AISBOF places this representation in the earnest expectation that the Bank, as a model public institution, will ensure strict fidelity to its own Service Regulations and will prevent irreparable prejudice being caused to officers by punitive action imposed in advance of lawful disciplinary determination.

Yours sincerely,

Sd/-
(Rupam Roy)
General Secretary

General Secretary: +91-9957563825
Camp Office – State Bank of India, Local Head Office, Dispur, Guwahati, Assam-781006
Email: aisbofbangalore@gmail.com Web: www.aisbof.org