



ALL INDIA STATE BANK OFFICERS' FEDERATION



(Registered under the Trade Unions Act 1926, Registration No: 727/MDS)

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TO ALL OUR AFFILIATES

Seeking comprehensive overhaul of the Career Development System (CDS) as presently implemented for officers in SMGS-IV and above, and seeking interim institutional protection of officers from adverse consequences of disputed CDS grades, pending such review.

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.6453/14/2026

DATE: 18.05.2026

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

Dear Sir,

Subject: Seeking comprehensive overhaul of the Career Development System (CDS) as presently implemented for officers in SMGS-IV and above, and seeking interim institutional protection of officers from adverse consequences of disputed CDS grades, pending such review.

The All-India State Bank Officers' Federation submits this representation for the urgent consideration of the management in relation to serious structural, procedural, constitutional and administrative-law concerns arising from the present operation of the Career Development System ("CDS"), for officers in the Bank.

The Federation clarifies at the outset that this communication does not dispute the necessity of a fair, objective and development-oriented performance appraisal system. The Federation recognises that a large public-sector banking institution such as SBI must assess performance, identify talent, reward merit and align officers with institutional objectives. The Federation has consistently been, and remains, a constructive partner of the Bank's management on matters of HR governance.

However, the present implementation of CDS appears to have materially departed from its declared objectives of fairness, standardisation, transparency, objective measurement and merit-based career development. The concerns articulated herein are not the grievances of a few disgruntled individuals; they are the collective, considered submission of a cadre of senior officers who have given the best years of their professional lives to building SBI into the nation's premier bank and who now find themselves evaluated through a system that does not satisfy elementary tests of fairness, transparency, or constitutional permissibility.

The issues raised herein are not confined to routine HR administration. CDS grades and related appraisal material now carry direct civil, financial and service consequences. They are used, or are capable of being used, for promotion eligibility (CDS grade-equivalent score as per the Circular dated 07.03.2026); promotion suitability assessment; Performance Linked Incentive (PLI) under the DFS framework dated 19.11.2024 extending to Scale IV-VIII and WTDs; extension of service evaluation (50 marks out of 100); performance improvement plan classification of BB / C grade officers; postings, recognition and other career consequences. Consequently, the Bank's appraisal architecture must satisfy the constitutional requirements of non-arbitrariness, fairness, reasonableness, transparency and natural justice that apply to SBI as a statutory public-sector institution constituted under the State Bank of India Act, 1955.

This representation is submitted without prejudice to all rights, remedies and contentions of the Federation and the affected officers. The Federation reserves the right to supplement this representation with further data, documents, officer-wise examples, circulars, spreadsheets, depositions, and legal submissions and to pursue all available remedies, including constitutional remedies, in the event the matters raised herein are not addressed within a reasonable time.

The Bank's CDS Master Circular records the following stated objectives of CDS: (a) increased business orientation through business-linked KRAs; (b) fairness and consistency in appraisal through standardisation of KRAs across officers in the same role; (c) accurate measurement of performance based on objective criteria; (d) creation of differential among employees based on objective measurement of performance; and (e) increased transparency on key HR consequences (promotion, posting, recognition) through objective evaluation of metrics. The Federation respectfully submits that these objectives are salutary.

However, in implementation, the following features of CDS appear inconsistent with its own declared purposes:

- Materially different roles are clubbed in the same cohort, in breach of the circular's own principle of "role-based cohort formation to the possible extent";
- Measurable and non-measurable roles are placed within the same comparative framework, exposing measurable-role officers to penalisation for external factors while non-measurable officers are insulated from objective external constraints;
- A forced grade-distribution curve (20% caps on AAA, AA, A, BBB, BB) appears to determine final grade outcomes irrespective of absolute performance achievement;
- Officers are not provided with disclosure of KRA-wise marks, RA marks, RevA marks, trait /discretionary marks, moderation / normalisation effect, cohort cut-offs or reasons for downgrade;
- Trait / discretionary scores (20% of total) materially affect final grades but are not visible to officers, are not subject to recorded reasoning, and are not subject to outlier detection or independent moderation;
- KRAs, targets and hurdles are in several documented instances assigned after several months of the financial year have already passed, while performance is evaluated from 1 April;
- Officers aggrieved by CDS grade do not receive an effective, independent appellate mechanism; the Sanjeevani / hierarchical escalation channel routes the matter through the same controllers who originated the appraisal, leaving little scope for reassessment.
- The separate Performance Appraisal Format / controller-views mechanism, where used for promotion suitability, may operate as parallel undisclosed adverse material.
- The CDS framework is now being linked to substantial PLI payments and to extension-of-service decisions, i.e., to decisions with direct monetary and livelihood consequences, without any corresponding upward calibration of disclosure or appeal safeguards.

1. Defective cohort design

The most serious and far-reaching structural deficiency of the current CDS framework is the grouping of officers performing materially different roles, requiring entirely different skill sets, domain expertise, client interfaces, KPIs and work environments, into the same evaluation cohort. This "one-size-fits-all" approach makes a mockery of the merit-based assessment that the CDS itself proclaims as its objective.

1.1 Cohort B403 at SMGS-IV

Cohort B403 at SMGS-IV combines, inter alia, Credit Support Officer; Customer Relations Officer; Field Officer; Field Officer (Agri) deployed in rural agricultural credit disbursement; Support Officer (Forex) handling intricate FEMA compliance, documentary credits and treasury operations; Senior Relationship Manager (Wealth) managing HNI portfolios with expertise in

investment and insurance products; Relationship Manager (TReDS), a fintech specialist driving supply-chain finance platforms; Bullion Branch CM (Advances) handling gold loan and bullion-related credit; and Additional Assessment Officers at CPC performing back-office credit processing. It is respectfully submitted that measuring a Forex Support Officer by the same yardstick as a Wealth Relationship Manager or a Field Officer (Agri) is not merely irrational, it is fundamentally unjust. The nature of work, client interface, risk environment, revenue contribution metrics and KPIs for each role are inherently different. CDS treats them identically.

1.2 Cohort B508 at SMGS-V

Cohort B508 at SMGS-V is even more incoherent. The Federation's empirical analysis of B508 shows 40 distinct roles spanning 8 unrelated role domains, Agri / Rural / FI / BC-CSP; Anytime Channel / ATM / Digital Channel; Forex / Trade / Treasury / Bullion; NPA / Stressed Assets / Recovery; Operations / BOPM / Customer Service; Resources / Wealth / NRI / Relationship; Retail / RE / RL / Personal Loans; and SME / Corporate / Credit Processing. KRA-count spread within the same cohort is 97 (from 5 KRAs in some roles to 102 KRAs in others). The Federation's risk scoring assigns B508 the highest risk score (256) of all cohorts examined. The cohort places, in one common grade-distribution exercise, AGM YONO, AGM CPC SMEBU, AGM AGRI, AGM REHBU, AGM TBU, AGM RCWM, AGM Anytime Channel, Relationship Managers, Support Officers (BC/CSP), Support Officers (Forex) and many others. The operational domains, target segments, revenue streams, customer interfaces and performance benchmarks for these roles could not be more divergent. Officers from LHOs in administrative or compliance roles are evaluated against field officers responsible for business growth in competitive markets, a comparison that yields neither fairness nor meaningful performance data.

1.3 AGM Anytime Channel / AC Operations Network officers

The Federation has received specific representations from AGM Anytime Channel officers indicating a systemic anomaly in the CDS cohort mapping and KRA framework applicable to AGM AC Operations (Network) posted across SBI LHOs. These officers have been placed in CDS Cohort B508 along with AGMs from core business verticals who have defined business growth targets, whereas AGM AC Operations is an operational, 24x7 function relating to ATM network management. As a result, all 47 AGM ACs across India have reportedly received only BB or BBB grades for FY 2024-25 and FY 2025-26, with no officer receiving a grade higher than BBB, indicating a structural issue rather than individual underperformance.

The present KRA system places these officers at a disadvantage because their performance is assessed on monthly cumulative parameters without carry-forward benefit, unlike business roles where annual performance can offset earlier shortfalls. Their outcomes are also heavily dependent on corporate-empanelled vendors, backend systems, RBI cash availability, vendor migration, and other factors beyond Circle or LHO control. Further, KRAs are reportedly assigned late in the financial year, without clear targets or MBPM from the

beginning, and KRA parameters are not uniform across Circles, creating unequal evaluation standards.

Thus, we request an immediate and fair review & revision of their BB/BBB grades for FY 2024-25 and FY 2025-26, creation of an exclusive cohort, uniform standardisation of KRAs, and a mechanism to exclude or neutralise performance shortfalls caused by factors beyond their control.

1.4 Other high-risk cohorts identified by the Federation's analysis

The Federation's empirical cohort-KRA mismatch analysis identifies, in addition to B403 and B508, the following cohorts as carrying high structural risk: B470 (Operations, Wealth Management, Marketing and Digital Banking – CC – SMGS-IV, 87 roles, 12 role domains, KRA-count spread of 90, risk score 254); B539 (Risk, Audit and Compliance – CC – SMGS-V, 79 roles, 10 role domains, KRA-count spread of 223); B542 (Operations, Wealth Management, Marketing and Digital Banking – CC – SMGS-V, 62 roles, 10 role domains, risk score 254); B653 (IBG, Global Market, IT – Bank Overall – TEGS-VI); B510 (Support Officer RE & RL / SMEBU / ABU / FI / TB & NI / UPI / GBSSU / SARG – CC – SMGS-V); B547 (IT and Analytics – SMGS-V, with internal KRA-count spread of 2,422); B150 (IBG Overall – Bank Level – up to Scale III); and B439 (Support Officer IBG – Bank Overall – SMGS-IV). The defect is therefore systemic, not isolated.

The Federation submits that the present cohort architecture fails the Article 14 test of rational classification. Clubbing materially different roles in one cohort amounts to treating unequal as equals, which is the classic Article 14 vice.

2. Measurable and non-measurable role inequity

The present framework creates a serious concern as between officers in measurable roles and officers in non-measurable / support roles. Officers in measurable roles are assessed on system-generated KRAs, financial targets and market / business outcomes. Officers in non-measurable roles are substantially dependent on Reporting Authority / Reviewing Authority assessment and on trait-based evaluation. This creates an unequal playing field. Officers in business / measurable roles may be penalised for external factors such as branch geography, rural / semi-urban market limitations, staff shortages, customer base composition, seasonal business patterns, system outages, vendor dependency, RBI cash availability, account migration and policy-level decisions, all beyond the officer's control. Conversely, subjective evaluation of non-measurable roles may yield higher grades without comparable objective constraints. The Federation respectfully submits that measurable and non-measurable roles should either be placed in separate cohorts or evaluated through a calibrated system that neutralises structural disadvantages.

3. Forced distribution / bell curve and its consequences

The Federation respectfully submits that the bell-curve method of performance evaluation, once popular for ranking employee performance, has been progressively abandoned by leading organisations world over and is now widely regarded as an outdated, inequitable and morale-eroding tool. The fundamental

flaw of the bell-curve approach is its assumption that performance must always follow a statistical distribution. This assumption is neither empirically valid nor managerially defensible in an organisation as large, diverse and high-performing as SBI.

There is no scientific justification for the position that, even when a branch, region, module or vertical achieves its entire budget, or when a team performs exceptionally well, only a fixed percentage (20%) of its officers may be awarded the top grade. This artificial cap suppresses genuine performance, creates avoidable dissatisfaction, undermines meritocracy and forces colleagues into zero-sum competition. The 1% discretionary upward revision quota is statistically negligible against this design.

In law, the bell curve is not per se illegal. However, it becomes legally vulnerable when applied mechanically in heterogeneous cohorts; when grade caps override absolute performance thresholds; when grades drive promotion, PLI and extension consequences; and when affected officers are denied disclosure of moderation methodology and appeal. The Federation requests that forced distribution be abolished or substantially rationalised, particularly for small or heterogeneous cohorts and for purposes of promotion, PLI and extension. At minimum, the following safeguards must be introduced: (a) absolute performance thresholds that cannot be force-displaced; (b) function-specific cohorts; (c) no forced downgrade where targets are met; (d) transparent moderation methodology disclosed to the appraisee; (e) statistical exception rules for small cohorts; and (f) independent moderation and appeal of outlier grades.

4. Non-disclosure of scores, moderation and reasons - violation of natural justice

Communication of only the final CDS grade is wholly inadequate where that grade affects promotion, PLI, extension of service or career progression. The officer must know the material on which the grade is based and must have a meaningful opportunity to make a representation against any adverse material. The Federation requests that the following information be disclosed to every appraisee in a controlled manner:

- KRA-wise marks and the system-generated score;
- Reporting Authority score and comments, wherever applicable;
- Reviewing Authority score and reasons for any material deviation from RA;
- Trait / discretionary score, and reasons for below-threshold marking;
- Final score before and after moderation / normalisation;
- Cohort size, applicable cut-off logic and grade-distribution methodology;
- Reasons for downgrade or adverse variation; and
- The precise score or entry that may affect promotion, PLI or extension of service.

The Federation does not seek disclosure of confidential personal data of other officers in the cohort. However, confidentiality cannot be invoked to deny an officer his or her own evaluative material and the methodology by which a career-affecting grade has been determined.

The legal position is settled. In *Dev Dutt v. Union of India*, (2008) 8 SCC 725, the Hon'ble Supreme Court held that every entry in the ACR which may affect an employee's chances of promotion must be communicated, and non-communication is per se arbitrary. In *Abhijit Ghosh Dastidar v. Union of India*, (2009) 16 SCC 146, uncommunicated below-benchmark entries were held not usable to deny promotion. In *Sukhdev Singh v. Union of India*, (2013) 9 SCC 566 (a three-Judge Bench), the Court affirmed that all ACR / APAR entries must be communicated within a reasonable period, overruling earlier contrary decisions. The ratio of these cases applies with greater, not lesser, force where the Bank uses CDS grades and related appraisal material for promotion eligibility, promotion suitability, PLI and extension-of-service evaluation. An undisclosed score, downgrade, trait mark, moderation outcome or controller view cannot lawfully be used as adverse material without communication and opportunity of representation.

5. Discretionary marks and the structural risk of bias

The Federation understands that trait-based marks form 20% of the total CDS assessment (and 30% for DMD positions), while such marks are not visible to officers and require no recorded reasons. Multiple Circles have reported instances where officers with high system-generated marks have received disproportionately low discretionary marks, materially altering their final grade without documented justification. The Federation does not allege that Reporting Authorities or Reviewing Authorities act unfairly as a class. However, an appraisal design which confers substantial subjective power without disclosure, recorded reasons, audit trail, outlier detection, independent moderation or appeal mechanism institutionally creates scope for perceived or actual arbitrariness, favouritism, victimisation and inconsistent treatment. Career progression is too important a matter to be left to surmise and conjecture.

The Federation requests the following safeguards:

- Mandatory written reasons for discretionary / trait scores below a notified threshold;
- Disclosure of such scores to the officer;
- A digital audit trail with retention of scoring rationale;
- System-generated outlier detection where the trait score sharply diverges from the system-generated KRA score;
- Independent moderation by an authority outside the immediate reporting chain;
- An appeal mechanism to an authority not connected with the original appraisal chain; and
- Special review in cases of suspected wrong mapping, sudden downgrade or systematic grade suppression.

6. KRA allocation, timing, revision and role mismatch

No officer should be evaluated on targets, hurdles or KRAs that were not communicated before or at the commencement of the evaluation period. A performance system becomes retrospective and procedurally unfair where KRAs are assigned late in the financial year but performance is assessed from 1 April. The Federation's examination of the SBI CDS KRA Master for FY 2025-26 reveals that KRA "Changed First" and "Changed Last" dates for several roles fall in August, September, October and November 2025, i.e., five to eight months into the financial year. Specific examples include role 16788 (CM / Support Officer AC Operations) with KRA change date 15.10.2025; role 18041 (Support Officer Anytime Channel) on 03.11.2025; and role 10518 (Support Officer Retail) with KRA changes between 02.09.2025 and 12.11.2025. The Patna Circle's consolidated CDS feedback expressly records that "KRA is assigned in the month of December. In operational area, there is no option to score marks in the past months." The feedback received by us expressly records that KRAs are typically assigned in October or November of the appraisal year, with scores measured from April, rendering the "best 9 out of 12 months" principle meaningless.

Officer representations further indicate concerns relating to mid-year or last-quarter KRA / budget revision; retrospective application of KRAs; local modification of KRA parameters by Reporting Authorities; role-KRA mismatch; additional duties not captured in KRAs (joint custodianship, currency chest management, gold loan administration, NPA recovery, leave reserve duties, single-officer branches); vendor-dependent ATM / channel outcomes treated as officer performance; corporate-level vendor contracts and system outages penalising the operational officer; account migrations to other branches / verticals without corresponding budget revision; and zero scores under the Cost-to-Income-Ratio parameter imposed on branch heads because of establishment costs from on-the-job training of POs/TOs, a Bank policy decision, not a performance failure attributable to the officer.

The Federation respectfully requests that KRAs, targets, hurdles, weightage and scoring formula be communicated at the beginning of the appraisal year (i.e., by 1 April of the relevant year); that no retrospective KRA application be permitted; that mid-year changes be prospective only, reasoned in writing and formally communicated to the concerned officer; and that the Bank develop a structured framework to neutralise vendor / system / RBI-cash dependencies and additional / joint duties undertaken by officers under operational exigency.

7. Separate PAF / controller views for promotion suitability

The Federation is constrained to raise serious concern regarding the practice, wherever followed, of collecting a separate Performance Appraisal Format ("PAF") or manual controller-views for promotion suitability apart from the annual CDS evaluation. If an officer is evaluated through CDS throughout the year, a separate undisclosed controller-view mechanism amounts to double evaluation and introduces a parallel subjective appraisal process. Any material used to affect promotion suitability must be objective, recorded, communicated to the officer if adverse or below benchmark, supported by reasons, open to

representation and consistent with the annual appraisal record. Undisclosed controller views, if used adversely in promotion suitability assessment, violate the natural-justice requirements set out in Mohan Lal Capoor and Dev Dutt and contravene Articles 14 and 16 of the Constitution. The Federation therefore requests a comprehensive legal and administrative review of the PAF / controller-view mechanism and a binding direction that no undisclosed adverse material shall be relied upon in promotion suitability assessment.

8. CDS-linked PLI and DFS guidelines

The Department of Financial Services, Ministry of Finance, vide Notification No. F. No. 15/6/2024-BO.I dated 19.11.2024, has extended the revised Performance Linked Incentive framework to Whole-Time Directors and officers in Scale IV to Scale VIII. The PLI under the revised scheme can extend up to 70% (Scale IV), 80% (Scales V and VI), 90% (Scale VII) and 100% (Scale VIII and DMDs/MDs/Chairman of SBI) of annual basic pay. Sixty-five per cent of total PLI is to be funded from 3% of the previous year's Profit Before Tax (PBT) and 35% from 10% of incremental PBT, subject to an overall payout ceiling of 5% of PBT. The scheme requires a board-approved policy in each PSB; it segregates officers into revenue-generating and non-revenue-generating pools; and it links individual eligibility to bank-level performance and individual performance.

PLI thus carries a direct, substantial monetary consequence, not merely a recognition consequence. Where SBI implements the individual-performance component of PLI through CDS grades, the CDS system must satisfy the governance standards expected of monetary reward systems: disclosure of criteria, objectivity, auditability, written reasons, board-approved policy and an effective appeal mechanism. CDS-linked PLI cannot be based on undisclosed CDS scores, hidden moderation, force-fitted grades, unexplained discretionary marks or opaque controller views. The Federation respectfully requests that the Bank disclose its board-approved PLI policy, the score-mapping formula, the grade linkage, the calculation methodology, the review process and the appeal mechanism, and that the Bank align CDS cohort design with the DFS scheme's requirement of revenue / non-revenue segregation.

9. CDS-linked extension of service

The Federation respectfully submits this section with particular emphasis. The Extension-of-Service Circular CDO/P&HRD-PM/4/2023-24 dated 21.04.2023, approved by the Central Board on 29.03.2023, assigns 50 marks out of 100 to CDS Grade in the evaluation metrics for grant of extension in service to officers. The benchmark qualifying score is 65 out of 100. Officers scoring 65 and above are considered for extension by the competent authority; officers scoring below 65 are mandatorily referred to the Review Committee for "Grant of Extension / Short Extension / No Extension", with onward right of appeal to the designated Appellate Authority.

The Federation recognises and accepts that extension of service from age 55 onwards (and from 58 to 60) is governed by Bank policy and is not an automatic or absolute right. The Federation does not contend otherwise.

However, once SBI has chosen to create a structured extension-of-service review process and to assign 50% determinative weight to the CDS Grade

therein, the officer acquires a vested right to a fair, non-arbitrary and reasoned process. A force-fitted, undisclosed, wrongly-mapped or structurally flawed CDS grade cannot lawfully be used decisively to deny extension, short extension or continued service usefulness.

Such a decision is not a routine administrative step. It is a decision that:

- terminates the officer's active service relationship with the Bank earlier than the reasonable expectation that an officer with three to four decades of unblemished service would have legitimately formed;
- affects the officer's livelihood at a stage of life where alternative employment opportunities are extremely limited;
- affects continuity of family medical insurance, ongoing financial commitments, children's education funding and other obligations structured around the expectation of continued service to 60;
- affects the officer's professional reputation, since extension refusal is widely understood within the institution and the wider banking community as a sign of unsatisfactory performance, even where the underlying CDS material is opaque and structurally unreliable;
- affects social standing, dignity and post-retirement engagement opportunities; and
- is, in real terms, the "civil death" of an officer's career, a phrase used by the Hon'ble Supreme Court in *State Bank of India v. Rajesh Agarwal*, (2023) 6 SCC 1, in a different but analogous context.

The Federation respectfully submits that an administrative decision of this gravity cannot rest on an input that is itself opaque, force-fitted, derived from heterogeneous cohorts and unaccompanied by any disclosure or representation rights. The Hon'ble Supreme Court has consistently held that procedures threatening livelihood, dignity and reputation must satisfy the Article 21 standard of being just, fair and reasonable (*Maneka Gandhi v. Union of India*, (1978) 1 SCC 248). Where civil consequences attach to administrative action, principles of natural justice must be read into the process to avoid arbitrariness under Article 14 (*State Bank of India v. Rajesh Agarwal*, (2023) 6 SCC 1). And where appraisal material is used adversely against an officer, that material must have been communicated to the officer and open to representation (*Dev Dutt; Abhijit Ghosh Dastidar; Sukhdev Singh*).

Within the ambit of the Article 21 of the constitution, the federation asserts:

- (i) that the procedure for extension review must satisfy fair procedure;
- (ii) that the input data (CDS Grade) on which 50% of the extension decision rests must satisfy disclosure, fairness and accuracy requirements;
- (iii) that the use of disputed, opaque and force-fitted CDS grades to deny extension is liable to be quashed by the constitutional courts; and
- (iv) that the consequences of such adverse decisions, loss of livelihood, dignity and reputation, engage Article 21 fair-procedure jurisprudence and require the Bank to operate with corresponding care.

The Federation requests that the Bank: (a) review all pending and recently decided extension cases where CDS grade was decisive or materially influential; (b) suspend adverse use of disputed CDS grades for extension purposes pending the institutional CDS review requested in this representation; and (c) require an independent verification of CDS grade reliability before any adverse extension decision is taken.

10. Gaps in grievance redressal and the shortcomings of Sanjeevani

A grievance mechanism cannot be meaningful where the officer is not told what is being challenged. The CDS framework discloses only the final grade. The officer does not receive KRA-wise marks, RA marks, RevA marks, trait marks, moderation effect, cohort cut-off or reasons for downgrade. To require the officer to “represent” against a grade in these circumstances is to require the officer to shadow-box. Multiple Circles have reported that Sanjeevani escalation, in practice, functions as a ritual reaffirmation by the same controllers (or their immediate superiors) without any independent reassessment.

The Federation requests the immediate replacement of the Sanjeevani channel with a two-tier independent appellate mechanism, with the following features:

- First tier: representation before an authority not connected with the RA / RevA chain;
- Second tier: review before a central appellate committee in cases involving policy-level issues, wrong cohorting, wrong role mapping, PAF / controller-view disputes, PLI consequences or extension consequences, with an AISBOF observer present;
- fixed timelines for disposal, with reasoned orders;
- protection of promotion, PLI and extension rights during pendency of grievance;
- power to correct role mapping, KRA mapping, score consequences and grade consequences;
- periodic audit of grievances and systemic corrective action.

11. Victimisation safeguards

The Federation does not make personal allegations against any individual officer of the Bank. The Federation’s concern is institutional and structural. Officer representations across multiple Circles indicate apprehension that the substantial subjective component of CDS, trait / discretionary marks, RA / RevA narrative, separate PAF / Controller views, may be used, or may be perceived to be used, adversely against officers who raise issues in Sanjeevani platform, escalate issues to seniors, whistle-blow, or raise legitimate service concerns as employee representatives. Such use, actual or perceived, would be contrary to the constitutional values underlying the Trade Unions Act, 1926; contrary to the Bank’s own service rules; and contrary to the institutional culture and feedback-based growth of the institution. The Federation requests the Bank to institutionalise explicit safeguards against any such victimization, including independent CDS review for officers who have raised formal service or

compliance concerns; and reasoned-order requirement for any adverse appraisal action against an office-bearer or union activist.

12. Institutional impact on morale and governance

A performance appraisal system must build institutional trust, not erode it. If senior officers come to believe that grade outcomes are pre-determined by cohort design and distribution caps, the system reduces motivation, damages morale and weakens institutional performance. The Federation has received specific feedback that officers are now “deliberately moderating performance near month-end to manage CDS scores”, a perverse outcome that directly harms the Bank’s commercial performance and is the diametric opposite of the stated CDS objective of business orientation. The Bank’s greatest asset is its people; a performance system that demoralises its senior leadership cadre inflicts direct, measurable damage on the institution it is intended to serve. SBI’s senior management cadre carries enormous operational, compliance, business, digital, risk and governance responsibilities, and is the backbone of the Bank’s operational and strategic leadership. The appraisal system applied to them must therefore be fair, transparent, legally sustainable and development- oriented.

In view of the foregoing, and in the interests of institutional fairness, officer morale, governance integrity, public-sector accountability and avoidance of avoidable litigation, the Federation earnestly requests the Bank to grant the following reliefs:

1. Withdraw, or in the alternative comprehensively overhaul, the present CDS framework as applied to officers in SMGS-IV and above, and undertake a joint redesign in consultation with the Federation, HR / CDS experts, independent academic experts and Federation-nominated observers, in a time-bound manner.
2. Pending such withdrawal or overhaul, suspend adverse use of disputed CDS grades for purposes of promotion, PLI, extension of service, PIP classification and posting consequences.
3. Disclose to every appraisee his or her own KRA-wise marks, RA marks, RevA marks, trait / discretionary marks, moderation / normalisation effect, final score before and after moderation, and reasons for any downgrade or material RA-RevA deviation.
4. Disclose grade-distribution methodology, cohort-size details and the manner in which the bell-curve or distribution rule is applied within each cohort.
5. Record and disclose reasons for downgrades, for trait/discretionary scores below a notified threshold, and for material deviations between RA and RevA assessments.
6. Disclose SBI’s board-approved PLI policy, score-mapping formula, grade linkage, calculation methodology and appeal mechanism.
7. Redesign cohorts so that only substantially similar roles, with comparable KPIs, external constraints and operating environments, are compared. Create separate cohorts for operational, support, business,

compliance, risk, channel, forex, digital, administrative and specialised roles wherever functional dissimilarity is established.

8. Review B403, B508 and the other high-risk cohorts (B470, B539, B542, B653, B510, B547, B150, B439) identified in the Federation's empirical analysis on priority.
9. Specifically review the BB / BBB grades of AGM Anytime Channel / AC Operations Network officers and create a separate AGM AC cohort.
10. Abolish or substantially rationalise the forced bell-curve distribution, particularly in small or heterogeneous cohorts. Where used at all, ensure that no officer who has met absolute performance thresholds is force downgraded.
11. Standardise KRAs across functionally similar roles and prohibit arbitrary local modification without recorded approval and disclosure to the officer.
12. Communicate KRAs, targets, hurdles, weightage and scoring formula at the beginning of the appraisal year (i.e., by 1 April). Prohibit retrospective application of KRAs or targets. Permit prospective mid- year reset only with recorded reasons and prior communication.
13. Develop and document a calibrated framework to neutralise vendor / system / RBI-cash dependencies, additional / joint duties, single-officer branch arrangements, leave-reserve and deputation duties, and other factors beyond the officer's direct control.
14. Conduct an immediate legal and administrative review of the separate PAF / controller-views mechanism for promotion suitability. Issue a clear direction that no undisclosed adverse material shall be relied upon for promotion suitability assessment.
15. Replace the Sanjeevani / hierarchical pre-grading channel with a two-tier independent appellate mechanism: first tier before an authority outside the RA / RevA chain; second tier before a central appellate committee with AISBOF observer participation in serious cases. Fix timelines, require reasoned orders and protect promotion / PLI / extension rights pending disposal.
16. Empower the appellate mechanism to correct role mapping, KRA mapping, score consequences and grade consequences, and to direct backward correction of promotion and PLI consequences where the grievance is upheld.
17. Suspend adverse use of disputed CDS grades for extension-of-service decisions pending institutional CDS review.
18. Review all pending and recently decided extension cases where CDS grade was decisive or materially influential.
19. Require independent verification of CDS-grade reliability before any adverse extension decision is taken (in line with the Article 14 / 21 fair-procedure standard applicable to livelihood-affecting decisions).
20. Ensure that CDS-linked PLI determination is transparent, objective, auditable and capable of representation / review.

21. Conduct a Bank-wide role-mapping audit. Allow representations for correction of role-mapping errors (including the measurable / non-measurable classification error)
22. Where role-mapping error is established, correct the CDS score, restore promotion eligibility, and recompute downstream PLI / extension consequences.
23. Institutionalise explicit safeguards against actual or perceived victimisation of officers engaged in lawful trade union activity, whistle-blowing, good-faith operational escalation or compliance reporting, including independent CDS audit for officers who have raised formal service or compliance concerns.
24. Issue interim binding instructions to all Circles / verticals that pending CDS grievances shall not prejudice promotion, PLI or extension rights until disposal.

The Federation further emphasises that, since every appraisal under the present CDS framework, including the Performance Appraisal Form (PAF) relied upon for promotion-suitability assessment, is mediated by substantial human intervention and subjective discretion at every stage, the architecture is structurally exposed to force-fitment of officers into pre-determined distribution slots and to actual or perceived bias in grade outcomes. The Federation therefore urges the Bank to discontinue this discretion-heavy framework and to revert to the earlier dispensation under which officers were assessed on absolute, role-anchored and objectively verifiable performance parameters, free from forced fitting into cohort caps and insulated against subjective downgrading or controller-level bias.

This representation is submitted in good faith and without prejudice to the rights, remedies and contentions available to the Federation and to the affected officers. The Federation may, if required, place on record further facts, data, documents, officer-wise illustrations, statistical material and other relevant submissions in support of the concerns raised herein, including actual instances where disputed CDS grades have adversely impacted promotion, PLI or extension related outcomes. It is requested that the concerns raised in this representation may kindly be examined objectively and sympathetically in the larger interest of fairness, transparency and institutional justice.

The Federation deeply respects the autonomy and the institutional responsibilities of the Bank's top management. It is precisely because of that respect, and because of the Federation's deep institutional commitment to SBI, that this representation has been submitted for your kind consideration and necessary action.

Thanking you.

Yours sincerely,

Sd/-
(Rupam Roy)
General Secretary

At the Service of Members for more than 6 Decades

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