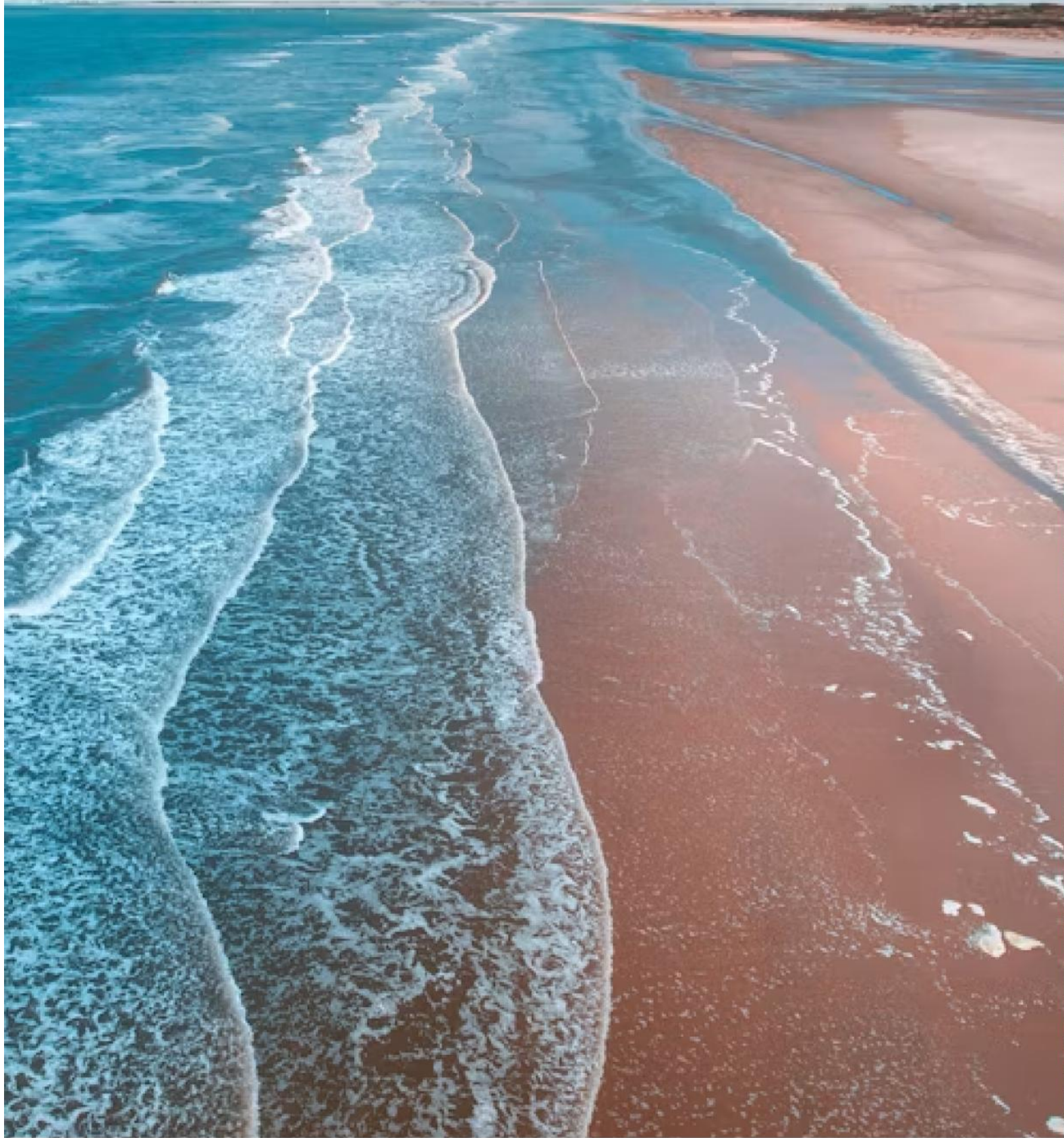


# **OFFICERS' CAUSE, JUNE - 2026**





# OFFICERS' CAUSE

**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.**

*Text of AISBOF Letter No.6453/14/2026. Dated: 18.05.2026, Addressed to The Deputy Managing Director (HR) & CDO, State Bank of India, Corporate Centre, Mumbai – 400021*

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-empowered 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, whistleblowing, 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. ■

## **ANOMALIES OBSERVED IN THE ANNUAL INTER-CIRCLE TRANSFER (ICT) EXERCISE 2026 REQUEST FOR RECONSIDERATION, RESTORATION OF SENIORITY AND PUBLICATION OF A SUPPLEMENTARY LIST.**

**Text of AISBOF Letter No.6453/15/2026, Dated: 18.05.2026, Addressed to The Deputy Managing Director (HR) & CDO, State Bank of India, Corporate Centre, Mumbai – 400021**

We invite your kind and considered attention to the recently published Annual Inter-Circle Transfer (ICT) Exercise 2026 for General Cadre Officers (up to the grade of MMGS-III), wherein several avoidable anomalies and grievances have been brought to our notice by our affiliates from various Circles. The present representation respectfully seeks reconsideration of the exercise and the publication of a supplementary list to afford respite to officers whose genuine, long-pending and constitutionally protected entitlements have not been honoured.

While we sincerely acknowledge the Bank's efforts to accommodate a sizeable number of aspirants seeking inter-circle transfer, we observe with deep concern that, despite numerous representations from the Federation, a significant number of officers with genuine and compelling requirements, many awaiting transfer for periods ranging from seven to nine years, have once again been left out. The grievances received from across the Circles disclose systemic issues touching upon principles of constitutional equality, settled service jurisprudence, the Bank's own published norms and binding directives of the Government of India. The detailed list of representations received from different Circles is appended herewith as Annexure-I, highlighting the anomalies and seeking redressal at your end.

### **Specific Anomalies Observed in the ICT 2026 Exercise**

**(a) Non-materialisation of transfer despite top position in the Waiting List:** Several officers placed at Sl. No. 1 in the published waiting list, both under the spouse-ground and other-ground categories, have not been considered for

transfer, while juniors placed lower in the list have been favourably considered. Once the Bank has itself prepared and published a sequenced waiting list, any departure therefrom without recorded reasons is the very disruption that the doctrine of non-arbitrariness seeks to eliminate.

- (b) Adverse impact of JIBO application on pending ICT requests:** A significant number of officers have reported that their long-pending ICT applications stood automatically cancelled on account of their having applied for the JIBO 2026 exercise. These officers were neither selected for JIBO nor considered for ICT, leaving them in a schizophrenic condition despite years of waiting. This very act of disfavour contradicts Clause 5(v) of the Placement Norms of the JIBO Notification dated 20.02.2026, which expressly provides that "Further, ICT applications under pipeline, if any, shall stand cancelled for selected candidates. However, the officers can apply for ICT once again, upon repatriation from their respective foreign assignments. Their seniority will be reckoned from the date of fresh application (post foreign posting) only." By extending the cancellation clause to non-selected officers, the Bank has obliterated the very protection consciously incorporated by it in the declared policy.
- (c) Near-total neglect of the "Others" ground category:** Across multiple Circles, officers applying under the "Others" ground category have been virtually excluded from the published list, with selections being almost entirely confined to the spouse ground. In several Circles, there has been little or no movement in the "Others" category for the past two to three years, despite officers having served at the same Circle for eight to nine years and beyond.

While the Federation respects the prioritisation of spouse-ground cases, the total exclusion of an entire policy-recognised category renders the "Others" head illusory and unworkable. The Bank's own ICT policy, by recognising the "Others" head, has created a corresponding legitimate expectation that genuine cases under that head shall be addressed within a reasonable cycle.

**(d) Inconsistencies in spouse-ground verification:** Multiple anomalies have surfaced under the spouse-ground head, including:

- (i) Applications rejected on the ground that the spouse's employer is not a "listed" private company: The test of "listing" is not a recognised criterion under the DoPT OM and disproportionately prejudices officers whose spouses are employed in legitimately incorporated but unlisted companies, LLPs and partnership firms. Such a criterion is not anchored in any published norm.
- (ii) Cases where both husband and wife are SBI employees yet ICT has not been granted, while juniors whose spouses work in other organisations have been transferred. This is in direct conflict with the judgement in *Bank of India v. Jagjit Singh Mehta* (supra), wherein the Hon'ble Supreme Court held that the spouse-together-posting principle applies with even greater force when both spouses are employees of the same Bank.
- (iii) Where one spouse is in the clerical cadre (post-2020 joiner) and the other is an Officer, the Officer has been transferred but the clerical spouse has been left behind on the ground that post-2020 clerical recruits are not eligible for ICT. This defeats the very purpose of the transfer and works at cross-purposes to the DoPT OM dated 24.11.2022, which explicitly calls for joint posting of spouses including across cadres, in the interest of family welfare and care of children below 18 years of age. Where the spouse

left behind is a female employee, the matter is governed additionally by DFS Letter F.No. 4/9/1/2014-IR dated 08.08.2014, which directs PSBs to accommodate her placement, on her request, at her husband's station "or as near as possible to that place or vice versa".

- (iv) Genuine cases involving small children below the age of 18 and dependent elderly parents have not been accorded due weightage, in derogation of the said OM and Section 4 of the Maintenance and Welfare of Parents and Senior Citizens Act, 2007.
- (v) The OM dated 24.11.2022 further mandates that where one spouse belongs to a Central Service/PSB and the other to a PSU, the PSU spouse "may apply to the competent authority and the said authority may post the officer to the station or, if there is no post under the PSU in that station, to the station nearest to the station where the other spouse is posted". This salutary direction is being administered with marked inconsistency across Circles.

The cumulative effect is a non-uniform application of policy across the Bank, a state of affairs squarely deprecated in *Maneka Gandhi* (supra) and *Bhupendra Nath Hazarika v. State of Assam*, (2013) 2 SCC 516.

- (e) Hardship arising out of the revised eligibility norms:** The recent revision of the ICT eligibility norms, by extending the minimum service requirement, has caused undue hardship to officers who were on the verge of becoming eligible under the earlier norms. In one such illustrative case, an officer of the 2019 PO Batch could not apply in January 2025 due to a documented technical glitch in the SMART Portal (a circumstance attributable to the Bank), and is now considered ineligible till 2027 under the revised norms, while batch-mates who applied on time have been transferred. Similarly, officers who joined as Junior

Associates and were subsequently promoted to Trainee Officer are being subjected to a fresh circle service period, ignoring their entire prior service in the same Circle. The principle of legitimate expectation also operates in their favour. A transitional relief is therefore necessary.

**(f) Compassionate and medical cases, denial of empathetic consideration:**

The following cases, all duly verifiable, have not been accorded the empathy and priority that the law commands:

- (i) An officer awaiting corneal transplantation with verified visual impairment.
- (ii) An officer who has undergone liver transplantation and requires continuous post-operative care.
- (iii) An officer whose spouse is undergoing cancer treatment.
- (iv) An officer with a mentally challenged sibling as sole care-giver.
- (v) An officer whose father has locomotor disability and whose brother has met with a major accident.
- (vi) Several officers with aged and ailing parents with no alternate care arrangement.

Each of these cases attracts the protective umbrella of the Rights of Persons with Disabilities Act, 2016 (Sections 3, 20 and 33), the DoPT OM dated 31.03.2014 read with OM dated 08.10.2018, the Maintenance and Welfare of Parents and Senior Citizens Act, 2007 (Section 4), and the dignified-family-life guarantee under Article 21 as expounded in *Bhagwan Dass* (supra) and *Net Ram Yadav* (supra). We earnestly request that these cases be revisited individually with a humane, statute-compliant approach.

**(g) Inordinately long-pending cases:**

Many officers have been awaiting inter-circle transfer for periods ranging from

seven to nine years, with applications dating back to 2017 and 2018. Continued dislocation from family, ailing parents and dependents has taken a heavy toll on personal lives and workplace performance. A one-time review of such long-pending cases, with a sympathetic approach, would restore institutional morale and confidence in the transfer mechanism.

**Equity in Inter-Circle Transfer of SMGS-IV & SMGS-V Officers**

We also reiterate our earlier representations regarding the need to bring equity to the Inter-Circle Transfer of SMGS-IV and SMGS-V officers. Officers repatriated to their home Circle after a long outside tenure are once again being subjected to transfer within a span of three to four years of stay at the Circle, while several others who are senior in terms of Circle stay continue to remain undisturbed. We once again propose the adoption of a "First-In-First-Out" (FIFO) principle for officers who have rejoined the Circle on repatriation, so as to ensure equitable sharing of conveniences and inconveniences and to prevent the perception of arbitrariness that specifically forbids. Compassionate considerations, family compulsions, children's education and continuity in elder-care, being indispensable for an officer to plan and excel both at the family front and in workplace performance, deserve due weight in such decisions.

In view of the foregoing constitutional, statutory and administrative considerations, we earnestly request your good office to kindly:

- (a) Publish a Supplementary List of Inter-Circle Transfer orders, incorporating those genuine aspirants whose names have been omitted despite topping the waiting list or having compelling compassionate grounds.
- (b) Restore the seniority of those officers who had applied for ICT but their applications were kept in abeyance considering the fact that they had also applied for JIBO but ultimately were not selected. Such ICT applications should be taken into cognizance

- while ascertaining the seniority in terms of eligibility in conformity with the Clause 5(v) of the JIBO Notification dated 20.02.2026 and in justification of the doctrine of legitimate expectation.
- (c) Adopt a holistic developmental approach to facilitate child-care opportunity, family welfare, women's safety and care-giver responsibility towards elderly dependents.
- (d) Ensure proportionate representation of the "Others" ground category in every ICT cycle, with a published explanatory note where the proportion falls below a reasonable threshold.
- (e) Revisit the recently revised eligibility norms with a view to providing transitional relief to (i) officers who were on the verge of eligibility under the earlier norms, particularly those prejudiced by the documented SMART Portal glitch of January 2025, and (ii) officers whose service as Junior Associate in the same Circle ought to be reckoned for ICT eligibility upon their promotion as Trainee Officer.
- (f) Exempt officers facing severe medical or family hardship, including those with benchmark disabilities or those acting as care-givers to persons with benchmark disabilities, from involuntary dislocation, and reconsider, with empathy and statutory compliance, the cases enumerated in the aforementioned annexure.
- (g) Adopt the First-In-First-Out principle for SMGS-IV and SMGS-V repatriated officers, supported by an objective scoring matrix on circle stay, family compulsions and prior outside tenure.
- We are confident that the Bank, with its long-standing tradition of being a caring and constitutionally compliant model employer, shall give due consideration to this humble submission and provide the much-needed relief to the affected officers. Your kind intervention in the matter shall be deeply appreciated by the entire fraternity of officers across the country.■

## **IMMEDIATE IMPLEMENTATION OF FIVE-DAY WORK WEEK IN THE BANKING INDUSTRY AS A MEASURE OF NATIONAL AUSTERITY, ENERGY CONSERVATION AND PUBLIC EFFICIENCY**

*Text of AIBOC Circular No. 2026/34, dated 13.05.2026, a communication to the Hon'ble Prime Minister of India on the captioned subject. The content of the communication is reproduced below. AIBOC Letter No. 2026/07, Dated:13.05.2026, Addressed to To Shri Narendra Modi ji, Hon'ble Prime Minister of India, Government of India, New Delhi*

*Respected Hon'ble Prime Minister ji,*

**Subject: Immediate implementation of Five-Day Work Week in the Banking Industry as a measure of national austerity, energy conservation and public efficiency**

We write on behalf of the All-India Bank Officers'

Confederation, the largest organisation representing bank officers across the country, to place before your esteemed office a matter of long-standing concern which has now acquired wider national relevance.

Your recent call to citizens and institutions to adopt austerity measures, conserve fuel, reduce avoidable travel, promote virtual engagement wherever feasible, and act responsibly in the larger interest of the national economy has been received with seriousness by the banking fraternity. The banking industry has always stood with the nation in times of challenge and transition, whether in financial inclusion, Jan Dhan, social security schemes, credit delivery,

recovery efforts, digital banking, implementation of Government-sponsored programmes, demonetisation, or the Covid-19 pandemic.

In this larger national context, we respectfully submit that the immediate implementation of a Five Day Work Week in the banking industry merits urgent consideration. This demand is not merely a service condition issue. It is a practical, implementable and nationally relevant policy measure that directly advances the objectives of fuel conservation, energy savings, environmental protection, operational efficiency and public convenience.

Banking, unlike many other sectors, cannot fully shift to work-from-home arrangements. Branch operations, cash management, customer service, compliance, recovery, field-level financial inclusion and Government scheme implementation require the physical presence of officers and employees. Therefore, where remote working cannot be extensively adopted, rationalising the physical working week becomes the most practical and structured alternative.

A Five Day Work Week will immediately reduce commuting by lakhs of bank officers and employees across the country. It will also reduce avoidable customer movement to branches for routine services, particularly in urban and semi-urban centres. The cumulative impact will be substantial: lower consumption of petrol and diesel, reduced traffic congestion, lower electricity usage, reduced operational load on branch infrastructure and a measurable decrease in the carbon footprint of the banking sector.

This measure assumes even greater significance in semi-urban, rural, remote and power-deficient areas, where thousands of bank branches continue to depend on generator sets for uninterrupted operations. These generators

consume significant quantities of diesel on every working day. Closure of physical branch operations for one additional day each week would therefore result in meaningful fuel savings over time, apart from reducing emissions and operational expenditure.

It is also important to recognise that banking services today are no longer confined to branch counters. With the rapid expansion of Digital India, citizens have access to UPI, mobile banking, internet banking, ATMs, cash deposit machines, business correspondents, call centres and other technology-enabled channels on a 24x7 basis. Even on holidays, customers are able to transfer funds, make payments, receive subsidies, pay bills, access statements and complete most routine banking transactions. A Five Day Work Week will therefore not deny banking services to the public; rather, it will align physical branch operations with the digital transformation already achieved in the sector.

We further submit that several major institutions and organised sectors in the country, including Central Government offices, the Reserve Bank of India, LIC, GIC, financial markets and many others, already function on a Five Day Week. The banking industry, despite being highly digitalised and despite carrying immense national and public responsibility, continues to follow a six-day physical attendance pattern. This results in avoidable commuting, infrastructure usage, fuel consumption, stress and operational expenditure.

The matter has already been discussed extensively at the industry level and has received broad acceptance in principle during the wage settlement process. Bank unions and officers' associations have also made it clear that daily working hours may be suitably adjusted to ensure that customer service, business requirements and institutional responsibilities are fully protected.

The issue, therefore, now requires final policy approval and notification by the appropriate authorities.

Hon'ble Prime Minister ji, implementation of a Five Day Work Week in banks would be a concrete institutional response to the national call for austerity and responsible resource use. It would demonstrate that fuel conservation and energy discipline are not limited to individual conduct alone, but can also be advanced through practical reforms in major public-facing service sectors.

We, therefore, respectfully urge your kind intervention for the immediate implementation of a Five Day Work Week in the banking industry. Such a decision would simultaneously serve multiple national objectives: conservation of fuel, reduction in energy consumption, lower carbon emissions, reduced congestion in cities and towns, improved productivity, better work-life balance and continued availability of banking services through digital channels on all days.

We assure you that the officers of the banking industry shall continue to discharge their responsibilities with dedication, discipline and national commitment. Implementation of a Five Day Work Week will not dilute our commitment to customer service, financial inclusion, Government schemes or national priorities. On the contrary, it will strengthen the banking system by making it more efficient, sustainable and aligned with contemporary service delivery models.

We trust that this long-pending and nationally relevant issue will receive your immediate and favourable consideration.

Thanking you,

Yours sincerely,

Sd/-

**Rupam Roy**  
General Secretary

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