



BSNL EMPLOYEES UNION

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BSNLEU/510 (T&P)

20.01.2025

To,

**Ms. Anita Johri,
PGM (Pers.), BSNL CO.,
Bharat Sanchar Bhawan,
Janpath, New Delhi – 110 001**

Sub: - **Suggesting modifications to the draft BSNL Transfer Policy – req.**

Ref: - **BSNL letter no.BSNLCO-PERS/15(11)/6/2024 PERS1 dated 26.12.2024.**

Madam,

With reference to the letter cited above, we wish to bring the following to your kind notice, for favour of necessary action.

Vide letter cited under reference, the Corporate Office has communicated the draft of the "Revised BSNL Employees Transfer Policy" to the Recognised Unions and Associations and has sought their views. It is also stated in the letter that, the draft policy has been recommended by a high level committee.

Transfer policy is an important HR issue of the employees. Hence, it would have been appropriate and democratic, had the representatives of the Recognised Unions and Associations are also inducted in the Committee, for the purpose of framing the New Transfer Policy. Alternatively, the representatives of the Recognised Unions and Associations should have been called by the high level committee before making their recommendations in black and white. We feel that seeking the views of the Recognised Unions and Associations at this stage is a mere formality for making a few cosmetic changes here and there.

We also wish to state that, the former CMD BSNL, Shri P.K.Purwar, in a meeting held with the representatives of the AUAB on 27-10-2021, assured that a joint committee would be formed to review the amendments done to Rule 9 of the BSNL Transfer Policy. The Minutes issued by the Corporate Office in this connection vide letter number F.No.BSNL/7-3/SR/2018 dated 29-10-2021, states as follows:-

....a committee comprising PGM(Pers), Sr.GM(Estt.) and Sr.GM(SR) and four members from Union /Associations shall be formed to include other genuine / emergency conditions requiring rule 9 transfers."

However, such a committee was never formed, despite BSNLEU giving many reminder letters to the Management, demanding to form the committee to review the amendments done to Rule 9 of BSNL Transfer Policy. This is the attitude of the Management, with regards to framing the Transfer Policy of the employees.

Presently, the employees are facing a lot of problems with regards to their transfer. BSNL Management is flagrantly violating the DoP&T orders in respect of posting the husband and wife in the same station. Similarly a good number of employees are unable to get transfer to their native circles, since Management has declared certain circles as surplus circles. Instead of finding a solution to these burning problems with a human face, Management has only ascertained in many places of this draft transfer policy, that it is having the authority to reject the requests of the employees for transfer.

It is reflected in para 3, under the caption **Management's Right**, that the Management has the right to transfer or not to transfer employee(s) from one post/ job to another, to different locations, to different shifts, temporarily or permanently, as per business requirements and needs of the Company. This clause gives arbitrary power to some of the reckless officers in the field level to violate the Transfer Policy. We demand that para 3 should be removed.

In para 4.3 it is stated that, request for transfer would be entertained only on completion of at least 3 years at a particular station. We demand that, this should be changed into 2 years.

In para 4.7 it is stated that, within the constraints of administrative feasibility, request for posting of husband and wife at the same station shall be considered. As we have already stated earlier, this is a flagrant violation of various

orders issued by the DoP&T, insisting for posting husband and wife in the same station. Already, BSNL Management is finding many excuses, for not implementing the DoP&T orders. Hence, we demand that the "ifs" and "buts" contained in para 4.7 should be removed. It should be modified and mentioned unequivocally that, BSNL Management would implement the DoP&T orders in letter and spirit, in respect of posting the husband and wife in the same station.

In para 4.8 the words "As far as possible" should be removed. Employees with Specified Disabilities as defined in the schedule to RPWD Act-2016 should be exempted from transfers/rotational transfers.

In para 6.2 (c), it is stated that, on post based promotion, Non- Executive employees may be transferred intra BA /OA. All Non-Executive cadres are SSA cadres, except the JE cadre. As regards the JE cadre, all the employees recruited prior to 2014 are treated as SSA cadre, while all the employees recruited after 2014 are treated as circle cadre. The transfer liability of the Non-Executives is within the SSA only. Even at the time when the Management undertook the exercise of "Consolidation of Business Areas, categorical assurance has been given to the Recognised Union that, the transfer liability of the Non Executives would continue to remain within the SSA.

The SSAs have now been renamed as OAs. Hence, the transfer liability of the Non- Executive cadres should continue to remain within the OA. BA is a large area, consisting of many OAs. Transferring the Non-Executives within the BA means, transferring them from one OA to another OA. Hence, we demand that para 6.2(c) should be removed. In that place, categorical mention should be made that, even on post based promotion, the Non-Executive employees would be posted only within the OA.

The wordings in Para 8.1 and also the contents of para 8.9 and 8.10 lack clarity. Hence, these may be clarified, so that our Union can place it's views concretely on these.

Due to the unscientific abolition of posts by the BSNL Management in the name of Restructuring of Manpower, after implementation of VRS in 2020, certain circles are declared as surplus in the cadres of JE and JTO. As a result JEs and JTOs are unable to get transfer under Rule 8 to these surplus circles and they have become a suffering lot. The Management should adopt a humanitarian approach to solve the sufferings of these employees. Instead of doing that, it is unfortunate that, the Management is incorporating a para in the BSNL Transfer Policy to prolong their sufferings.

Even at present, transfers, including transfers under Rule 8 would be given only when vacancy exists. Hence, such a separate para is not needed stating that transfers would not be given to the surplus circles. Hence, we demand that, para 8.14 should be completely removed. We once again insist that, as a one time measure, the Management should consider the requests of the JEs and JTOs for transfer under rule 8 to the so called surplus circles.

Para 9.1(ii) should be modified. The employees who meet with accident should be given Temporary Transfer if they apply for, without insisting that they should have sustained minimum disability.

Para 9.1(d) should be modified. Employees should get temporary transfer on completion of 2 years of service.

Similarly, para 9.2 should be modified. The duration of the temporary transfer should be extended up to 5 years.

We have already insisted that, Non-Executive cadres should continue to remain as OA cadres. Hence, the wordings **Circle/BA** in para 13 and 13.1 should be changed as **Circle/OA**.

Para 14 says that transfer can be carried out at any time as an exception to this Transfer Policy. When Management puts in place a Transfer Policy, it should be implemented in letter and spirit. Implementing transfer in exemption to this policy is undesirable. Hence, Para 14 should be removed.

After one year of the implementation of this Transfer Policy, keeping the experiences into consideration, the Management should review this Policy, in consultation with the Recognised Unions and Associations. A clause to this effect may be incorporated in this Policy.

Before the Transfer Policy is finalised by the Management, we may kindly be provided with an opportunity to put forth / explain our view points in detail before the concerned authority.

Thanking you,

Yours sincerely,



[P. Abhimanyu]
General Secretary