



SANCHAR NIGAM EXECUTIVES' ASSOCIATION

CENTRAL HEAD QUARTERS

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All Communications
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To,

Dr. Kalyan Sagar Nippani ji,
Director HR BSNL Board,
3rd Floor, Bharat Sanchar Bhavan,
Janpath, New Delhi 110001

Letter No. SNEA CHQ/DIR HR/2022-2025

Dated 11th February 2025.

Sub: Submission of inputs comments on draft review of Transfer Policy.

Ref: Letter No. BSNL CO/PERS/15(11)/6/2024-Pers1 Dated 26/12/2024.

Respected Sir,

With reference to the above subject and letter from AGM Pers Policy, we are submitting the following for kind and sympathetic consideration and making changes in draft transfer policy to pass on benefits to executives and finalise a robust Transfer Policy for BSNL Executives.

First of all, we convey thanks for considering our request for review of Transfer policy for stopping long stay transfers and for keeping words given by your honour in the Formal Agenda meeting for considering our request for sharing draft before finalisation of Transfer policy. We would like to recognise and appreciate this great proactive HR approach by the BSNL management.

We were pursuing for stopping Mass Rotational Long stay Transfers and restoration of the anti-executive clauses incorporated/ modified in recent review of Tenure Policy and certain restrictions on inter Circle transfer by creating new Circle areas like NCR. It was informed that a special committee will be constituted and we were very happy that the Committee has been constituted to review the Transfer Policy. We were most pleased to see very positive officers to be part of this Committee as all the members of Committee are so humble, supportive and genuine on HR issues and under your valuable guidance all have resolved many issues in favour of the Executives working in BSNL.

But after having looked at the Draft Transfer policy shared with us, we were totally disappointed as unfortunately the draft policy we have received is against the excellent nature and highly positive HR approach of the members of the Committee as many anti executive clauses are added in this draft policy. We have informally discussed with certain members of the committee and it has been informed that basic Draft has been prepared by officers in the Pers Policy section and when we have inquired with officers in the Pers Policy Section, they have informed that they only have consolidated whatever is suggested by members of the Committee and we are unable to find who is involved in such anti executive working when BSNL is headed by officers having Excellent HR approach.

It seems that directions given by you to review this transfer policy for the benefits of executives have been mis-interpreted by somebody to spoil the existing transfer policy to the extent that with such negative review whatever benefits/relaxation/facilities are available to the executives as per existing Transfer Policy that also will be withdrawn and nothing is in favour of the executives. But the BSNL executives will have to face the worst situation what they faced under long stay transfers. It may be seen that instead of stopping long stay Transfers , the attempts are made to spoil the policy to the extent that executives

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transferred under long stay. Definitely, your good self has not given such directions creating more troubles to already affected executives was not the very purpose of this review of Transfer Policy.

We put on record that by this draft, the transfer policy has been made as complicated as it has been unnecessarily rearranged for creating confusion on all points and it was the most difficult task to analyse what is modified and what is added and what is deleted. It may be please seen that entire clauses are added in this draft Policy making it a totally New Transfer Policy.

The way this new Draft Policy is proposed with repetition of all earlier clauses wherein there is no change proposed has unnecessarily created confusion among the executives. This is the key reason, it took a long time for us to go through each point, clause, line of old policy and similar clause in new Policy and compare both the policies by relating dislocated redefined clauses. We are extremely sorry for the delay in submission of our views, but such complexity created in framing draft Transfer policy is one of the Major the reason for delayed submission of our response. This proposal for draft review of Transfer Policy should have been framed only by showing/mentioning the changes proposed and should not have been made as complex as being done now.

Further, all this unrest and negativity would have been avoided if SNEA as recognised Majority Associations should have been made as part of the Committee for review of Transfer Policy. We would have been part of the preliminary discussions, framing of draft policy and unwanted clauses would not have been incorporated and more stringent conditions would not have applied against executives causing mass unrest among executives that too when CMD BSNL has taken stand to keep aside all factors impacting moral of executives in BSNL.

We hereby request, at least, one representative of the Recognised Majority Representative Association may be incorporated in this committee so that issues can be sorted out by respecting sentiments of the executives as well as keeping interest of BSNL and we will understand who is working against Executives in BSNL to such a manner.

Anyhow, we have no much worries about consolidation of such damages in Transfer Policy by Pers Policy section as your good self and **Shri. A. Robert J. Ravi, CMD BSNL** have been always kind enough to keep good HR approach and we are confident that your such high HR approach will arrest the damages being created to executive fraternity as proposed in this draft Transfer policy and the final draft policy will be such Transfer Policy which will be referred in line with other PSUs as happened in other such excellent decisions of BSNL Management.

With such great hopes we are submitting the following points for kind and sympathetic consideration please.

A. Specific Suggestions:

1. **Suggestion:** Instead of combined transfer policy for all i.e. Non-Executives, Executives and GM/PGM and CGM level officers, three separate policies may be framed exclusively applicable to Non-Executives, Executives and GM and above level officers.

Justification: This we are suggesting as there is much difference in working of Non-Executives , Executives in junior/Middle Management and Executives in senior Management i.e. GM and above. Specifically, in present scenario, there is no role of BSNL in transfer and posting of GM, PGMs and CGMs as this work is taken over by DoT by constitution of the committee and CMD BSNL is only member from BSNL and nothing is left with BSNL about posting of officers on deputation. Further due to sensitive nature of post the GM and above level officers held, the financial powers they are holding and tendering and other sensitive work in eyes of Vigilance

wing viz passing Bills of different vendors are involved, coming to BSNL and going back to DoT any time as per their requests etc are totally different. Also in this draft policy it is proposed that certain clauses of stay at particular Station/OA/BA or Circle will not be applicable for GM and above level officers. Also many clauses like Rule 8/9 transfers, clauses related to Non-Executives which contributed to 60% of the overall transfer policy are not applicable to GM and above level Officers.

Reverse is the case with the Non-Executives ~~and they~~ do not have any Financial powers, administrative powers and all are OA level cadres and there are no mass transfers within OA or Intra/Inter Circle. It may be further seen that many clauses of this draft Transfer policy or existing Transfer policy, up to the extent of 70 % of the policy, are not applicable to Non-Executives. But about all clauses except Section C for non -executives are applicable to Executives/officers in Junior/Middle Management. Hence, we request for **three separate and non-linked Transfer Policies exclusively and independently applicable to Non-Executives, Executives and GM and above level officers**. The Policy for Executives may be renamed as “**BSNL Executive Transfers Policy 2025**”.

2. **Suggestion:** Please review the existing Committee for review of transfer Policy by incorporating one nominated representative of the Recognised Majority Representative Association and further discussions in the committee may be held accordingly.

Justification: We would have been part of the preliminary discussions, framing of draft policy and unwanted clauses would not have been incorporated and more stringent conditions would not have applied against executives causing mass unrest among executives that to be when CMD BSNL has taken stand to keep aside all factors impacting moral of executives in BSNL. Same may be followed in any review of Transfer policy in future. This will avoid unwanted issues and mass unrest among executives as we have seen and witnessed now and it will help in framing highly acceptable, smoothly operative Transfer Policy protecting interest of Executives.

3. **Suggestion:** The Certain Experienced Officers from the Telecom and other wings should be posted in the Pers Policy section which deals with transfer policy and many other policies related to Junior/Middle Management of BSNL.

Justification: This Draft of review of Transfer Policy is framed exclusively by the officers who are not directly aware about the working of the field units and these officers have practically not experienced difficulties faced by the executives in the Telecom wing. There is a need to put mixed officers from different wings and mainly from the Telecom wing which covers 80% of the total Executive strength of BSNL, which is totally missing now and this is the reason for the mass unrest. The Certain Experienced Officers from the Telecom and other wings should be posted in the Pers Policy section which deals with transfer policy and many other policies related to Junior/Middle Management of BSNL. Please make rearrangement in the Pers Policy section by posting certain officers from the Telecom wing so that the issues of majority of the executives in BSNL will be given consideration.

4. **Suggestion:** OA erstwhile SSA Concept should be continued as basic concept for counting stay of the Executives for any purpose including Break in service.

Justification: It is seen that the attempt is made for adding BA level transfers as minimum level of Transfers instead of SSA/OA Concept. We agree that with BA concept there are certain changes in the administrative working pattern, but there is nothing change in basic working of BSNL, the geographical conditions, area of OAs/SSAs etc. In Circles like Kerala, number of BAs are equal to SSAs/OAs and in

many Circles multiple OAs/SSAs are merged and it becomes a large geographical area making it a set of Intra Circle Transfers. The area of OAs is in hundreds of Kilometres and some of BAs are covering the entire Circle or State and such transfers on the basis of BA Stay will cause more damage than some Inter Circle Transfers. SSA/OA concept is the basic concept and it should be the only base for counting stay and issuing Intra OA, Intra BA, and Intra Circle Transfers.

5. **Suggestion:** Proper Restructuring review should be done before declaring excess, just sufficient and deficit executives Strength in any particular Circle/OAs.

Justification: After VRS, BSNL has undertaken review of Restructuring and while reviewing restructuring norms, the review of posts are done at all India level and Circle wise requirement or available working strength was not given consideration. Further, while framing norms for justification of any post were drastically reduced causing less justification of posts to particular Circles. In nutshell the restructuring review was on an all India basis and hence many Circles have been declared as Surplus Circles affecting the overall strength of executives in particular Circle. Hence we request that fresh restructuring review may be done at the earliest and by giving due consideration of actual requirements by reviewing the norms for justification of posts.

6. **Suggestion:** One time action to give consideration to all pending Rule 8 transfers by adjusting vacancies of these JAOs and JTOs to Circles against which rule 8 & 9 transfers are pending more after completion of eligibility criteria after five years. There is a ban on recruitment of JTOs/JAOs and the posts in restructuring review has been reduced and hence present most difficult situation has been raised on pendency of Rule 8 transfers in about all Circles.

Justification: There is no recruitment in BSNL as the same is banned since 2019. Apart from this the number of JTO posts are reduced without giving consideration to the JTOs/JAOs who have not opted for VRS in particular Circle/OA and many Circle it happened that instead of reducing JTO/JAO strength and showing shortage, the figures are showing excess Strength and thereafter BSNL has started this excess /deficit criteria on basis of this defectively justified posts. As such many Requests of rule 8 Transfers are pending and there is need of sympathetic consideration of all such old pending cases including requests to excess Circles also.

7. **Suggestion:** We propose to have appellate authorities to review such biased and pick and choose transfers by individual Officers and before approaching Court and wasting Money of self & BSNL, he/she would have an opportunity to get the grievances addressed within BSNL.

Justification: It is seen that many times the controlling officers are biased to certain officers and some vindictive transfers are issued. But there is no redressed mechanism as in many cases the representations given in individuals are recorded or shown dust bin by the controlling officers and finally matter is disputed and taken to the court wasting BSNL Money. Hence the First and Second appellate authorities may be defined in the policy to deal with such transfers. The executives having grievances if any about transfers issued for him or her, should first represent it through proper Channel to the Office/Officer competent to issue Transfer orders at concerned level.

8. **Suggestion:** Provision for calling volunteers for meeting shortage with assurance to return back within fixed period of two years

Justification: As of today, many Circles are facing shortage of executives and some Circles/OAs are always having shortage of executives. Administration issues some

transfer orders and in such cases transferred Executives avoids joining at such places by adopting all means. In many cases executives are joining at Tenure stations which are faraway places but not joining such non-popular stations. The reason behind it is that there is no guarantee for return from such non-Popular stations. As such to meet shortages in such non-popular stations, the Provision may be made for calling volunteers as one time option for filling up vacant posts in such OAs/Circles with written assurance for return/posting to choice station within fixed period of two years.

9. **Suggestion:** Dependent Parent Clause for relatives may be re-defined in the case of retention on critical illness medical grounds of parents.

Justification: In case of administrative transfers, it has been noticed that in certain cases of executive under transfers, the parents are facing critical illness but the parents are financially not dependent on the executive, but they are in need of support from their son/daughter during this critical period of life. In many cases of administrative transfers, the executive has to join the transferred place by leaving the parents in such worst conditions wherein the entire family is disturbed just because the parents are financially independent, which is unhuman and illegal. It is requested to relax/withdraw the financial dependency clause and retention may be granted from administrative transfers of the Executives having parents facing critical cases and if required it may be ensured from official sources with undertaking from executive concerned that parents are staying with him and undergoing treatment for critical illness and his/her presence with them is must.

10. **Suggestion:** Provision for posting to MTNL Delhi and Mumbai area to be added in the Transfer Policy.

Justification: Now it is final that BSNL will provide the Telecom services in MTNL Mumbai and Delhi Area and BSNL has officially taken over the Telecom services in both the areas. Very shortly these units will be declared as Circle of BSNL as these areas are having potential more than the many other existing Circles and there will be immediate requirement of BSNL Manpower in this area. As such, there is a need to incorporate MTNL Delhi and Mumbai areas as separate Circles of BSNL and transfers and postings may be decided on the basis of these guidelines.

11. **Suggestion:** Rule 9 and Mutual Transfers in case of Executives promoted under Special LICE.

Justification: BSNL has designed special guidelines for filling unfilled vacancies of JTOs in certain Circles by allowing JEs from other Circle to join these Circles and certain restrictions have been put for the return back of such executives to his parent Circle and recently the mutual Transfers are also banned. It is agreed that these executives have opted for this and are promoted out of turn and in routine there should not be any relaxation but the same needs to be incorporated in deserving cases on genuine grounds as defined in Rule 9 policy. We request to allow Rule 9 transfers in strict adherence to these guidelines to deserving JTOs. Further, in case of mutual transfers, the overall strength of Circles is not going to be disturbed and hence mutual transfers may be allowed for Special LICE JTOs at par with the other LICE JTOs.

12. **Suggestion:** Special Provision for Own Cost Request Transfers before completion of two years minimum tenure in deserving self-accidental or suddenly aroused medical cases, executives suffering from certain infectious contagious diseases like TB (Tuberculosis), executives requesting on genuine grounds of critical illness the Father/ Mother and Depending in laws and to the Single parents female/male

having solely dependent wards undergoing education in cases of recent death incidents of husband/wife.

Justification: It is seen that many executives are obeying the administrative Transfers and joins at the place of transfer. But after joining at transferred places, some issues happens with them, some of them are not aware about the provisions of Transfer policy in support of his grievances, some unfortunately losses partners and dependent Children are alone without support of anybody and in some cases executive himself undergoes critical/serious medical issues or meets any unforeseen accident and some are crossing the age limit and facing certain issues due to increased age limits wherein shifting of family is not possible and needs transfer back to family. In such cases, there is no provision in Transfer policy to give consideration in such deserving cases for joining back or getting transfer before completion of two years stay. In such deserving cases the competent authority to issue transfer may give consideration to such deserving cases as per recommendations of BA/Circle Heads as the case may be.

13. **Suggestion:** Reference letter number mentioned under Rule 8 & Rule 9 policy should be deleted while issuing final policy as new policy will take over all such changes/orders.

- B. Modifications Required in Proposed Draft Transfer Policy:** We have gone through all the points of draft Policy and we hereby suggest the point/clause wise changes/ modification in draft Transfer Policy. We are ready for any detailed justification on these suggestions/modifications as and when called by your high office. **Details attached as Annexure-I.**
- C. Request for addition of New Clauses to have more clarity and passing right benefits to the executives:** We have analysed the missing points which need to be added in this transfer Policy for smooth and transparent implementation of transfer Policy. The details mentioned under relevant clauses and also attached **as Annexure-II.**
- D. Request Addition to existing Clauses:** It is seen that there are chances of wrong/mis -interpretation of the certain clauses/sub clauses due lack of clarity, and there is need of addition of certain words for clarity. **Details attached as Annexure-III.**
- E. Request for deletion of certain Clauses adversely affecting Executives:** Though we have suggested details of changes to be incorporated in Annexure-A, we are submitting that retain clauses/sub clauses are against interest of the Executives and hence should be deleted and should not be part of the Final Transfer Policy. **Details attached as Annexure-IV.**
- F. Review of Clauses of Tenure Transfer Policy issued last year:** We have requested for review of the Tenure Policy as many clauses are added while framing this policy last year. Also certain clauses of this draft Policy are available in this policy also and hence there is need of review of Transfer Policy once for all. Unfortunately, our suggestions for same has not been given consideration and only partial proposal is added in this draft Policy. It is requested that these Tenure Clauses also should be added to this Executive Transfer Policy 2025 and single and robust Transfer Policy may be please framed for dealing with transfer Posting of Executives in BSNL. The tenure period of All India Tenure stations are well defined by DoPT/DoT and BSNL cannot extend it beyond these norms, but it has been enhanced. Further

but it has been enhanced. Further Tenure is applicable for entire Circles and not at SDCA level as applied now. Further all Tenure Policies encourages its staff for joining at Tenure places, but here efforts are made to create pressure of the Executives by enhancing restrictions beyond norms defined by DoPT/DoT. As such it is required that the Tenure Transfer Policy published vide letter Dated 19/09/2023 also needs to be reviewed in true spirit of DoPT/DoT guidelines. We have consolidated all such details of changes required in Tenure Policy. **Details attached as Annexure-V.**

G. Changes required in ERP/EES OTP window: Now OTP Procedure adopted by BSNL has also become part of the Transfer Policy. As such, for smooth implementation of Transfer Policy, certain changes are required in the OTP Window and its operation in ESS/ERP. We have consolidated all such issues and **Details attached as Annexure-VI.**

Sir, we have made exhaustive submission on the lengthy proposal of Draft Transfer Policy by Pers Policy section for total modification of existing Transfer Policy and hence there are chances that there is need of discussions on certain issues in interpreting the suggestions in the spirit we are suggesting. Hence, we request for one Special meeting of the Recognised Majority Representative Association with the Committee for One to one submission before committee on the points/suggestions /submission by SNEA and to decide which suggestions are aggregable and which suggestions are not aggregable to the committee.

Once issues are decided by the Committee, we further request to have one separate Meeting with your Honour for final Submission on the points/suggestions which will be not agreed by the Committee so that we take final understanding and we convey same to the executive Fraternity so that stand of Management.

Sir, we are confident that all our suggestions will be given consideration and the BSNL Executives will get excellent Revised Transfer Policy to be operated for Years together and difficulties and hardship faced through earlier policy and this draft Policy will be cleared as always assured by your good self.

With Warm Regards,

Sincerely Yours,



M. S. Adasul,
General Secretary
SNEA CHQ

Encl: AA

Copy to:

1. CMD BSNL for kind information please.
2. CGM BW BSNL CO for kind information and n/a please.
3. CGM EW BSNL CO for kind information and n/a please.
4. PGM Pers/SR/RSTG BSNL CO for kind information please.
5. PGM Estt/Admn BSNL CO for kind information and n/a please.
6. PGM EF BSNL CO for kind information and n/a please.

Sub: Submission by SNEA on draft Review Changes required in Draft Transfer Policy

1. Introduction: OK. Except Clause (viii). The sub clause (viii) To ensure continuity of management and systematic succession planning for key posts in middle and senior management level- May be please deleted. It has no such relevance.

2. Grounds of Transfer:

2.1 OK Except Clause (ii)

2.1.1 The sub clause (ii) Job rotation requirement in synchronization with period specified for post, station/ and Circle tenure. Past experience in various functions and nature of jobs handled -May be deleted. Stopping the Tenure based long stay transfers was main request of SNEA, on which this proposal for revision of Transfer policy was initiated. An addition of such clause giving scope to Tenure based long stay Transfers cannot be justified as BSNL has already faced losses due to mass transfers over last three years.

2.1.2 To give consideration to the Request transfers of the Executives for posting as per the personal and family requirement. – This may be added. There is nothing mentioned about Request transfers either in grounds or objectives of Transfer policy for which Online Transfer Portal is Opened and being utilised for years together.

2.2 OK, but the Word Purely in this sentence may be deleted. It should be rewritten as ...Transfers shall not be done purely based on tenure decided under the transfer policy. Transfers shall also be based on business requirement of the Company and competencies and skills required to execute the work or to provide an opportunity to employees to develop competencies as per job rotation requirement.

2.3 This clause may be added..... There will be no long stay rotational transfers at any level i.e. OA/BA level, Intra Circle or Inter Circle level and transfers should be limited to the need base transfers to meet shortages and administrative requirements.

3. Management's Right: OK.

4. General Principles:

4.1 OK.

4.2 In this sub clause 4.2, the transfers are indirectly related/linked with IPMS/APARs which is unwanted as IPMS/APARs has no relation with Transfers. By using such clauses, the controlling officers may delay relieving of under transfer executives on name of completion of IPMS/APARs which is definitely not expected under Transfer policy. Hence the words added in draft transfer policy viz. **in sync with annual IPMS/APAR cycles may be deleted.** Rest OK.

4.3 Clause 4.3 -Request transfers shall normally be entertained after completion of at least 03 years at a particular Station. - The proposed enhancement to three years instead of existing two years is unnecessary and unwanted. Two years is big period to serve at any particular station due to administrative transfers to meet requirement of company and **hence the period of 02 years may be restored** instead of proposed three years. It may added that **This clause of minimum service of two in cases of self/Parent/Close relative Critical illness cases may be relaxed in deserving cases by the concerned authority.** Rest OK.

4.4 Clause 4.4 in this clause BA may be replaced with /restored to OA. Or it may be made as Circle/**BA**/OA. OA should be basis of any transfers as some of OAs covers hundreds of KMs distance and such BA bases transfers will be tool

in hands of certain BA Heads for victimisation of the employees. Also various soft tenures OA/deficit strength OA is available in some OAs and introduction of BA word will restrict the executives of same BA to fulfil the manpower requirement of OA having staff shortage.

4.5 Clause 4.5 -As far as possible, transfer requests to choice station from the employees left with less than 02 years of service for superannuation, shall be considered. This may be modified as -As far as possible, transfer requests to choice station from the employees left with less than 02 years of service for superannuation, shall be considered with priority.

4.6 Clause 4.6 in case employees try to influence transfer and posting through means other than proper channel, action will be taken as per Rule 22 of BSNL CDA Rules. Rule 22 of BSNL CDA Rules provides that “no employee shall bring or attempt to bring any political or other outside influence to bear upon any superior authority to further his interests in respect of matters pertaining to his service in the Company”.- This clause may be deleted. It is difficult for Management to sustain such Political pressure and in many cases it is seen that Management is biased or under pressure in dealing such political influential cases or cases referred by senior Officers/offices of BSNL/DoT. Or this clause may be modified as -In case employees try to influence transfer and posting through **Political or other outside influence means, other than proper channel**, action will be taken as per Rule 22 of BSNL CDA Rules. Rule 22 of BSNL CDA Rules provides that “no employee shall bring or attempt to bring any political or other outside influence to bear upon any superior authority to further his interests in respect of matters pertaining to his service in the Company”.

4.7 OK.

4.8 OK.

4.9 OK.

4.10 OK.

4.11 **Clause 4.11** -The request for exemption from ~~rotational~~ transfers and postings or posting to a particular Circle/Station due to serious medical ailments (as given in **Annexure-B**) suffered by the Employee or any of his/her dependents shall be considered by the Transfer and Placement Committee. Any exemption granted to the employee shall be reviewed by the Competent Authority for issuing such transfers. ~~Transfer and Placement Committee annually~~. The word ~~rotational~~ transfers may be deleted and ~~Transfer and Placement Committee annually~~ should be replaced by competent Authority for issuing such transfers.

4.12 OK.

4.13 The changes required in Tenure Transfer Policy are attached as Annexure-B.

5. Transfer and Placement Committee: The entire clause should be deleted. Introduction of any ‘Transfer and Placement Committee’ as one more source of influence should not be introduced. Such introduction of Transfer and Placement Committee, will give way for corruption as seen in similar such cases and hence and let the Competent Authority to continue to decide the requests with its wisdom to deal all such cases.

6. Principles of Transfer and Posting:

6.1 Clause 6.1 May be deleted : The sentence ‘The employees shall not be posted in his/her declared home town is against the interest of Employees/Executives and the posting at Home town even with lower pay scales and no perks is the reason why the employees chose the BSNL services over the private services with higher pay and perks. Further Separation in posting on basis of pay

scales is not justified and supported by any orders, Initial posting is also done as per the vacancy position and posting on promotions are to be decided only on basis of vacancies and hence introduction of this clause is not required and hence may be deleted.

6.2 Clause 6.2 with all sub-clauses (a) to (d) May be deleted: No need of introduction of any such anti employees and anti BSNL clauses. Posting on any promotions is subject to vacancy position and if there are vacancies existing then, employees/Executives may not be disturbed by transfers. It may be noted that due to modifications in rules , employees/executives are not getting even single rupee benefit as the increment on Functional Promotions are withdrawn by BSNL. In about all promotions, there is no single rupee increase in Salary of employee. The Transfer grant, TA/DA rates of BSNL are very less as that of Year 2002. Further, executives /employees in BSNL have to serve at remote, odd, non-popular, hard, semi hard and soft Tenure stations and some of them are ready to continue at such difficult places even on promotions and it is naturally subject to vacancy in promoted cadre. It may be seen that GM/PGM level officers are also not transferred on every promotion and many of them are posted at same place subject to vacancy position. Further, the clause (d) is already in existence in EPP and it is not required in Transfer Policy as being done now. As such the clauses (a) to (c) of compulsory transfers for executives and non-executives in BSNL and clause (d) for no transfers on Time Bound Promotions are unwanted for. Hence Clause 6.2 with all its sub clauses (a) to (d) for transfer on each and every executive on each and every promotion may be deleted.

6.3 Clause 6.3: OK.

6.4 Clause 6.4:

- (i) Sub clause (i) OK.
- (ii) Sub clause (ii) at the end it may be added Submitted and updated as on last date of submission of application.
- (iii) Sub clause (iii) at the end it may be added Except in cases of requests on grounds critical illness cases reported after closure of OTP window.
- (iv) Sub clause (iv) and (v) are routine practices and no need to make it part of Transfer policy.
- (v) This new sub clause may be added as Sub clause (iv) and (v).
 - The OTP window will be opened quarterly basis on 15th of January, April, July and October every year and Requests received will be consideration respectively before end of March, June, September and December. **OR** It will be best if OTP window should be open for all the days in year and the Pers Section, Circle heads will extract the final data available on Online Transfer Portal on given dates of that Particular Quarter. Thus, unwanted pressure on ESS/ERP will be reduced. It will also give opportunity to the executives to submit /withdraw the OTP Requests without much tension. Also Management will get update information about
 - The applications /request which will not be given consideration due to administrative reasons will be kept in waiting list and the individual may decide during the next window period about its withdrawal if any.

6.5 Clause 6.5: No such clause should be introduced. It may be please deleted. This is normal practice followed in BSNL and no need to incorporate in Transfer Policy for different reasons. It is fact that there are certain issues in Transfer posting orders issued by the any office and naturally from Corporate Office as these transfers are issued on basis of only office records of stay

available with office. There are always chances of corrections and modifications. In many cases, the Corporate Office is not having updated information about the factual data, local transfers issued and mainly issues faced by the concerned executive are not in knowledge of Corporate Office. Hence such extra ordinary powers should not be given to any higher office.

6.6 Clause 6.6: Thanks for incorporating this clause for retention on grounds. It may be noted that all these cases are crystal clear and supported by the supporting documents viz. Bonafide Certificate issued by the school/college, Mark sheet of student or any other official document to establish the standard of Ward, Entry of name of ward in Family records of employees and these cases should be decided by the Competent authority at that particular level and such cases should not be referred to any Transfer and Placement committee. Hence words in this clause '~~by Transfer and Placement Committee~~' may be deleted. Also Heading may be changed from Retention to Retention of Educational Grounds of Ward. Rest is OK.

6.7 Clause 6.7: May be please deleted. The posting on sensitive posts is done as per the directives of Vigilance actions and these tenure are changed time to time and it is mandatory to follow by BSNL, being PSU, but same cannot be part of Transfer Policy which cannot be modified as per changes made time to time.

6.8 Clause 6.8: May be please deleted. This is also normal practice and it is but natural that once new order is issued, then it supersedes old order. But the revised policy is effective from date of its order and all the cases prior to this order needs to be given consideration as per the earlier policy. Specifically issues related to stay, tenure etc are as per the old policy and same cannot be transferred to new policy. As such, there is no need of introduction of this sub clause and hence it may be please deleted.

7.0 Transfer on Administrative Grounds: OK.

8.0 Request transfers outside Recruiting unit:

8.1 Sub clause 8.1 The first part is OK. But the second part after ...If it is not possible to accommodate an employee borne on one gradation list, in to another gradation list without injury to the other members in the gradation list such transfers shall not ordinarily be allowed except by way of mutual exchange is not clear. On discussions it was informed that it is in relation with seniority of the employee in the Transferred Circle. But as seniority is already defined under clause 8.4 below, there is no need of repetition and may be deleted or the special purpose of adding this clause may be clarified.

8.2 OK.

8.3 Transfer by way of mutual exchange **including Executives promoted under special LICE**, if themselves inherently unobjectionable, shall be allowed, but in order to safeguard the rights of employees borne in gradation list of both the offices, the employee brought in shall take the place in the new gradation list that would have been assigned to him/her had he/she been originally recruited in that unit or the place vacated by the official with whom he/she exchanges appointment, whichever the lower.

8.4 OK.

8.5 The deserving cases **including Executives promoted under Special LICE**, term used in this clause, need to be specifically defined viz. on critical illness grounds of self /parents, spouse working grounds or from Excess to deficit Circle. The powers for relaxation of minimum five years' service condition in deserving cases viz. on critical illness grounds of self /parents, spouse working grounds or from Excess to deficit Circle, Care Giver case, PwBD

Category employees will be with Circle Heads with due and proper recommendations on specific grounds by BA Head.

8.6 OK.

8.7 OK. But after this, **one new clause may be added that** On implementation of Rule 8 Transfer, employee will be treated as employee of the transferred Circle and his lien will be maintained at Transferred Circle. One can avail the Rule 8 transfers or mutual transfers for more than one time but he/she will be eligible for next rule 8 Transfers to any Circle including Home/Recruiting Circle only after completion of Five years of minimum services in transferred Circle.

8.8 In this clause period of six months or at least three months in place of modified 145 days may be please restored and the present period of 15 days is not sufficient to meet

8.9 OK.

8.10 OK.

8.11 OK.

8.12 OK.

8.13 In this clause, the words with names of Circles viz. NE-I, NE-II, Assam, J&K and A&N Circle in this clause and in case of other Circles may be replaced as **All India Hard/Semi Hard/Soft Tenure Circles and Non-Tenure Circles respectively.**

8.14 The sentence -Therefore, while considering Rule-8 transfer requests in the waiting list for surplus Circles may be ignored **is not correct.** If anyone want to go to that specific Circle and not to any other Circle, then his/her request should be waitlisted in ESS and next person applying to these Circle will be updated about pending waiting list to that Circle. Hence this part of the sub cluse may be please deleted.

8.15 **Procedure for maintaining waiting list for transfer under Rule-8:**

i. In case of mutual transfers, applicant **including Executives joined under Special LICE** can apply for transfer under Rule 8 before completion of 5 years. ~~However, the instructions stated vide point 8.14 are not applicable on mutual transfer cases under Rule 8 of BSNL Transfer Policy wherever such transfers otherwise permissible.~~

ii. OK

iii. The sentence Single waiting list may be prepared for transfers including spouse ground cases (if Spouse is working in Central Govt., State Govt. & PSU). May be deleted. Instead of combined waiting list should be prepared **Circle wise** i.e. to out Circles and only for Circles having excess Executives where Rule 8 requests are not possible to consider immediately. In other cases the requests will be given consideration as and when received and hence no waiting list.

iv. The clause (iv) may be replaced as the rule 8 Request transfers on spouse working grounds if Spouse is working in Central Govt., State Govt. & PSU will be given preference over other Rule 8 Requests.

v. OK.

8.16 The clause for **Power to relax:** CMD, BSNL may relax the provision of Rule-8 transfer policy in any specific case or in general, as he/she may deem fit. – The power to relax minimum limit of 05 years is with Circle Head and there is no need of any power to relax any other the condition wherein intervention of CMD BSNL is required in the cases related to JTO. Such powers may be

vested with PGM Estt BSNL CO and in extreme case with Director HR. CMD BSNL is very high level post and precious timings of CMD BSNL may not be utilised in such petty works. **This clause may be please modified as Power to relax other conditions:** PGM Estt BSNL CO may relax the provision of Rule-8 transfer policy in any specific case on recommendations of Circle Heads on genuine and specific grounds.

The following **Additional clause** may be added at suitable place above.

- 8.17 The vacancies of Executives to be created due to Transfer under Rule 8 transfers, should be added to the outgoing Circle for conducting LICE and same should be reduced from Circle where this eligible executives is being transferred under Rule 8. - This will help in overcoming problem of substitute being faced now in about all Circles as there is no direct or outsider recruitment in BSNL.
- 8.18 Rule 8 transfers after completion of seven years from Non-tenure and five years at Tenure stations will be considered to Excess Circles to extent of 5% of total sanctioned strength of JTOs /JAOs in that particular Circle.
- 8.19 Further Rule 9 transfers on grounds of Spouse working should be converted to Rule 8 transfer on completion of two years' service in recruited Circle.
- 8.20 There should not be any restrictions for any number of mutual transfers to a particular Executives as it no loss for both circles getting working hands.
- 8.21 Weightage of Shortage of SDEs may be given while considering Rule 8/9 Requests to Circles having excess JTOs and Shortage of SDEs

9.0 Deputation/Temporary Transfer:

- 9.1. Sub Clauses (i) to (iii) OK

In Sub Clause (iv) on recommendations of Circle Head may be added and it should be modified asAny other deserving case, duly recommended by Circle heads with specific justifying grounds with approval of Director (HR) BSNL Board.

The detailed under **subject to feasibility and on the following conditions** may be give separate Clause No 9.2 and subsequent clauses may be numbered accordingly.

Under sub clause (d) it is mentioned that Temporary transfer under this rule 9 may be considered only after completion of minimum 03 years of service in the recruiting unit. -This clause may be deleted. This is temporary Transfer that to be considered on genuine grounds defined in this policy as good HR policy and not to restrict genuine requests. If this condition is imposed at this stage, it will be stoppage of Rule 9 transfers and the scope of Rule 9 transfers will be limited to only two years which is not the purpose and aim of introducing Rule 9 Temporary Transfer Policy. Remaining part of this sub-clause is already covered under clause 8.2 above and hence no need of its repetition here.

- 9.2. OK.
- 9.3. Temporary transfer as mentioned in para 9 will be for a maximum period up to 2 years in one stretch. After break (i.e. cooling off period of **3 years**), it can again be for 2 years. The **cooling period** may be **reduced from three years to One year** as Rule 9 transfers are issued on basis well defined specific and genuine grounds
- 9.4. OK.
- 9.5. In this clause competent authority is mentioned as per Table 10. Competent authority for considering such temporary transfer requests shall be as prescribed in Para 10 below wherein in nothing is mentioned about SSA/ **BA**

Cadres. Hence this clause may be modified as competent authority for considering such temporary transfer requests shall for be BA Heads for **BA** OA level cadres and Circle Heads for Circle level cadres.

- 9.6. The clause for **Power to relax**: The Director (HR), BSNL Board may relax the provision of above mentioned policy in any specific case or in general, as he may deem fit. Such powers may be vested with PGM Estt BSNL CO and in disputed case with Director HR. This clause may be please modified as **Power to relax other conditions**: PGM Estt BSNL CO may relax the provision of above mentioned policy in any specific case on recommendations of Circle Heads on genuine and specific grounds and disputed cases may be decided by Director HR BSNL Board.

10.0 Transferring Authority: In this table no competent authority mentioned for Gr C & D employees or **BA** OA level cadres. Further earlier powers of transfers of SDEs and below cadres with PGM Pers/PGM Estt/PGM EF are withdrawn and handed over to Director HR, who is busy with many other works including important work of Land Monetisation which is being monitored from highest level of Government of India. Also all the Verticals are headed only by PGM level officers which are equivalent to CGMs and hence competent to decide such Transfer cases of SDE/AO and below level officers. Hence we request to revise the Table 10 as follows.

Sr. No.	Level	Transfers within the Circle/BA	Inter circle and transfers to/within Corporate Office
1	DGM/Jt. DGM/ Addl.GM or equivalent	Head of Circle	Director(HR) , BSNL Board
2	AGM/DE or equivalent	Head of Circle / BA Head within their jurisdiction.	Director(HR) , BSNL Board
3	SDE/DM/SET/M T or equivalent	Head of Circle / BA Head within their jurisdiction.	PGM Pers , PGM EF, CGM BW, CGM EW, CGM TF, GM Arch within their jurisdiction
4	JTO/AM or equivalent/ Non-executive employees	Head of Circle / BA Head within their jurisdiction	PGM Estt, PGM EF, CGM BW, CGM EW, CGM TF, GM Arch within their jurisdiction
5	Group C & D/ JEs, Non-executive employees	Circle Head / BA/ OA Head within their jurisdiction or their delegated authority	PGM Estt.

10. ADDITIONAL GUIDELINES SPECIFIC TO TRANSFER OF EXECUTIVE EMPLOYEES WITH ALL INDIA TRANSFER LIABILITY:

- 11.1 **Transfer Tenure:** The Note mentioned under this clause should be applicable for cadres and it should not be limited only to PGM level Officers. PGM are the only officers in BSNL who are having financial powers and holding sensitive posts. If these rule are not applicable for such highly sensitive posts, then it should not be applicable to other posts and all the administrative and financial powers are withdrawn and nothing is sensitive on any of the posts below level.
- 11.2 Under Clause 11.2, the period for minimum stay at particular station should be at par with Station Stay and hence it should be 04 years and not three years as proposed now.
- 11.3 OK.
- 11.4 **Counting Stay of the Executives:** Earlier the stay of non-executive Cadres was counted only for Intra Circle Transfers and stay for inter Circle transfers

was counted from joining as JTO/JAO. As there is no weightage given in Promotions as JTO/JAO for the service rendered in non-executive cadre except qualifying service for LICE and many times it is not choice of the promoted JTO/JAO to get posting in same SSA/OA where he/she was working as JE or Non-Executive Cadre. Further these JEs successful in JTO LICE are undergoing about one year rigorous training at different Training Centre away from his HQ in Non-Executive Cadre. Hence the services for Transfers in executive Cadre for Intra as well as Inter Circle Transfers may be counted from joining duties as JTO/JAO and for intra OA transfers stay may be counted from the Entry in the Non-executive Cadre. Accordingly this clause may be modified by adding following sub-clauses

- 11.4.1 Inter circle tenure based transfer in respect of Executives will continue to be restricted for SDE/ Other equivalent levels and above.
- 11.4.2 However, the number of officers transferred out of Circle at any time would not generally exceed 10% of the ~~sanctioned~~ **Working** Strength in the OA/~~BA~~/Circle for officers up to STS level.
- 11.4.3 Transfer/Posting history of DOT employment shall be taken into account for the ex-DOT absorbed employees in BSNL.
- 11.4.4 Service period of ~~(03)~~ **04** years or more will only be recognized while computing post/station/~~BA~~/Circle tenure **for administrative Transfers in the interest of Service, while for request transfers it will be two years.**
- 11.4.5 For Territorial Circle Executives, while computing Station/~~BA~~/Circle tenure, any stay in non-territorial Circle within the territorial jurisdiction of the Circle shall also be counted.
- 11.4.6 Similarly, for non-territorial Circle executives, stay of territorial circle shall be counted while computing Station/~~BA~~/Circle tenure.
- 11.4.7 Further while counting Circle tenure of an executive, the weightage should be given to services rendered by the Executives at Tenure Stations within Circle viz. Circle tenure Stations declared by Circle or Soft, Semi Hard and Hard Tenure stations declared by BSNL CO and the stay at these stations should be reduced from the total stay of executive in that Circle. The Circle Stay of executives will be counted by excluding/reducing services rendered at these tenure stations within Circle to the extent of defined tenure period. **Hence New sub clause may be added as**While counting Circle stay of the executives, the service rendered at Circle tenure Stations declared by Circle or Soft, Semi Hard and Hard Tenure stations declared by BSNL CO should be reduced from the total Circle stay.
- 11.4.8 Further no weightage is given to Intra Circle Transfers by the Executives which are issued in the Interest of service. As such, One year relaxation may be given per Intra Circle administrative transfer issued in respect of that particular executive. **Hence New sub clause may be added as** One year relaxation may be given per Intra Circle administrative transfer issued in respect of that particular executive and his/her Circle stay will be reduced accordingly.
- 11.4.9 It is seen that the executives while posted at Circle tenure Stations declared by Circle or Soft, Semi Hard and Hard Tenure stations declared by BSNL CO are also compelled to Inter Circle Such executives are willing to complete their tenure. Also they are posted at such difficult stations and locations due to administrative reasons but no weightage is given to them. **Hence New sub clause may be added as** The executives working at Circle tenure Stations declared by Circle or Soft or Semi Hard Tenure stations declared by BSNL CO if opt in writing for completion of OA/

~~BA~~/Circle Tenure, then he will be retained at that tenure station and his/her Circle Tenure will be reduced to the extent of Tenure period declared for that particular Tenure Circle/Semi Hard, Soft Tenure station.

- 11.4.10 Further while counting OA tenure of an executive, the weightage should be given to services rendered by the Executives at Tenure Stations within Circle viz. Circle tenure Stations declared by Circle or Soft, Semi Hard and Hard Tenure stations declared by BSNL CO and the stay at these stations should be reduced from the total stay of executive in that Circle. The ~~BA~~ OA Stay of executives will be counted by excluding/reducing services rendered at these tenure stations within Circle to the extent of defined tenure period. **Hence New sub clause may be added as** While counting OA stay of the executives, the service rendered at OA tenure Stations declared by Circle or Soft, Semi Hard and Hard Tenure stations declared by BSNL CO should be reduced from the total Circle stay.
- 11.4.11 **New sub clause may be added as** In case of such executives opting for continuation of Circle tenure Stations declared by Circle or Soft, Semi Hard and Hard Tenure stations declared by BSNL CO, then his/her OA/~~BA~~/Circle stay will be reduced in case of Intra/Inter Circle transfers in case of serving at Circle tenure Stations declared by Circle and break in Circle stay will be granted for executives serving at or Soft, Semi Hard and Hard Tenure stations declared by BSNL CO

11.5 OK.

11.6 **Working at Tenure Stations/Other Circles:** This may be separated in further sub-clauses as follows.

- 11.6.1 In the career span of all executives, normally one ~~Hard~~ **Hard or Semi Hard tenure as declared by BSNL CO time to time** ~~such as North East, Assam, J&K, A&N Islands~~ and one term in other non-tenure Circles/Soft SSAs as declared by BSNL CO, if any, would be required.
- 11.6.2 After completion of tenure, the executives shall be accommodated at the ~~OA Circle~~ of their choice as far as possible and not generally disturbed for the next three years **including functional Promotions.**
- 11.6.3 The stay in tenure/hard tenure Circle/SSA would be counted only if the executive has worked, **working or opting for continued working for completion of the tenure period in the Circle/OA** after the same was declared tenure Circle/OA.
- 11.6.4 The period of leave (any type), training, etc. in excess of 30 days per year will be excluded in counting the tenure period in a particular tenure station (Hard/Semi-Hard/Soft) i.e. the period of leave, training etc. availed over and above 30 days per year will not be counted in calculating the tenure period in hard tenure station.

11.7 This may be separated in further sub-clauses as follows.

- 11.7.1 For considering executives for tenure posting on transfer, the willing executives may be given preference first, then preference will be given for executives with longest stay from Non-Tenure Circles having Excess Executive Strength and then then preference will be given for executives with longest stay from Non-Tenure just sufficient Circles.
- 11.7.2 Female executives would also be encouraged to serve in tenure postings. Due recognition to female executives who have served in hard tenure locations shall be given in their APARs.

11.7.3 However, posting of unwilling female executives to **Hard/Semi Hard tenure stations and Inter Circle long stay Transfers** would be avoided.

11.7.4 The female executives should be excluded from Inter Circle Administrative transfers on basis of the stay. **OR** In case of eligibility of any female executive for Inter Circle Administrative Transfers, the female executives may be given option for accepting either Inter Circle Transfer at company cost or Intra Circle Transfer at own cost.

11.8 OK.

11.9 OK

11.10 May be deleted. There are many genuine issues and some executives are victimised by out of turn, pick and choose transfers and in such cases redressal of grievances is required, and the victimising officer/offices do not respond to genuine request and hence time is required for getting justice from higher Officers. Further in mass transfers, the redress of grievances takes months together, but relieving period in transfer order is in days. Hence this clause may be deleted or modified as Disciplinary action as per BSNL CDA Rules shall be taken if the employee does not relocate to the newly assigned post within the permissible time frame after decision on appeal against transfer made to higher authorities in BSNL and it shall amount to non-obeying of orders.

11.11 OK

11.12 There are defined guidelines by DoPT on this subject and it was well incorporated in earlier transfer policy. There was no need to enhance the age limit as done now. Rather it was required that by considering health issues of self and parents, this age limit should have been reduced. As such here the old clause may be restored with reducing age for posting of unwilling executives to All India Hard and Semi hard Tenure stations to 50 years as it is difficult to serve at these hard stations due to reduced health conditions. Hence this clause may be restored as Generally, the transfer of executives who are more than 50 years of age (as on 31st March of that particular financial year) would be avoided for posting to Hard tenure stations, the transfer of executives who are more than 54 years of age (as on 31st March of that particular financial year) would be avoided for posting to Semi-Hard tenure stations. Similarly, transfer of officers up to SAG grade would generally be avoided in case of more than 58 years of age. However, up to STS level, transfer of officers involving change of station would normally be avoided after 55 years for inter circle transfers and after 57 years for intra circle transfers.

11.13 To avoid court cases and heavy expenditure thereof **New sub clause may be added as**The executives should get the grievances in transfer posting cleared through representations to concerned cadre controlling authorities in BSNL and should avoid approaching court till their appeal is decided by the concerned authorities. The competent authority has to decide all such appeals against transfers within 30 days period of submission of appeal.

12 **ADDITIONAL GUIDELINES SPECIFIC TO EXECUTIVE EMPLOYEES WITH CIRCLE SERVICE LIABILITY :**

12.1 It is OK Except the counting of stay for Intra Circle or station transfers. The stay counting for intra Circle shall be started from entry in executive cadre. As there is no weightage given in Promotions as JTO/JAO for the service rendered

in non-executive cadre except qualifying service for LICE and many times it is not choice of the promoted JTO/JAO to get posting in same SSA/OA where he/she was working as JE or Non-Executive Cadre. Further these JEs successful in JTO LICE are undergoing about one year rigorous training at different Training Centre away from his HQ in Non-Executive Cadre. There is no financial benefits as BSNL has withdrawn the facility of one increment on such Functional promotions. Hence the services for Transfers in executive Cadre for Intra as well as Inter Circle Transfers may be counted from joining duties as JTO/JAO and for intra OA transfers stay may be counted from the Entry in the Non-executive Cadre. Accordingly this clause may be modified by adding following sub-clauses

12.1.1 For counting Station tenure, the period of service rendered in the previous cadre(s)/ grade(s) would be counted.

12.1.2 For Intra Circle transfer, stay will be counted from the date of regular promotion/recruitment into the grade of JTO/JAO and others equivalent to the first level of Executive Hierarchy.

12.2 OK.

12.3 The age limit 58 Years may be reduced to 57 Years as due to downgraded health conditions it is difficult to stay away from family and at this stage family members are not ready to shift on transfers.

12.4 **New sub clause may be added as** By assessing requirement of Executives and meeting continued shortage of executives, at particular OAs/ stations, the Circle heads are empowered to declare these OAs/Stations as Circle tenure to maximum limit of 25% OAs at a time and meet the shortage of executives accordingly. These Tenure stations/OAs should be reviewed after every four years.

13 Related to Non-Executives and hence no comments from our side. Only request is that three separate Transfer Policies viz. for Executives, Non-Executives and GM & Above level may be framed. The Transfer Policy for Executives may be limited for JTO/ JAOs to DGMs/Jt GM etc. As GM /PGM level transfers are different in nature and being decided by DoT, the same should be de-linked from the Executive Transfer Policy. The Policy for Executives may be renamed as “**BSNL Executive Transfers Policy 2025**”.

14 There is no need to add this clause 14 as fresh clause as already it is covered under introduction, aim & objection clauses above. Exception if any should be limited period of one year extendable for maximum one more year in case of most deserving cases of excellent and Extra Ordinary Performance.

15 OK.

16 **Annexure A** related to Composition of Transfer and Placement Committee May be deleted as justified above.

17 Thanks for introduction of **Annexure B** for retention of medical grounds. It may be added as separate clause may be No. 14 instead of Annexure B. Similar exemption from Long Stay/Tenure based transfers may be granted to the executives suffering from certain infectious contagious diseases like TB (Tuberculosis), executives requesting on genuine grounds of critical illness the Father/ Mother and Depending in laws and to the Single parents female/male having solely dependent wards undergoing education in cases of recent death incidents of husband/wife.

Sub: Submission by SNEA on Additional Clauses Required in Executive Transfer Policy 2025

We have analysed the missing points which need to be added in this transfer Policy for smooth and transparent implementation of transfer Policy. The details mentioned under relevant clauses and some of important clauses are reproduced here.

1. **Applicability of the Policy:** This Executive Transfer Policy 2025, will be applicable to all the BSNL Executives working all over India including area under MTNL Delhi and Mumbai areas as separate Circles of BSNL and transfers and postings of executives in BSNL will be decided on basis of these guidelines.
2. **No Long Stay Rotational Transfers:** There will be no long stay rotational transfers at any level i.e. BA level, Intra Circle or Inter Circle level and transfers should be limited to the need base transfers to meet shortages and administrative requirements.
3. **Cost of Transfers:** All Transfers issued on administrative reasons as well as Transfers as per request of individual after completion of three years station stay will be at company cost and request transfer before completion of three years station stay will be at own cost of employees. In case of own cost transfers joining period of maximum two days will be available if transferred place of posting is more than 1000 Kms road travel distance.
4. **OTP window Opening :** The OTP window will be opened on quarterly basis on 15th of January, April, July and October every year and Requests received will be considered respectively before the end of March, June, September and December.
5. **Clause 6.4 (v):** The applications /request which will not be given consideration due to administrative reasons will be kept in the waiting list and the individual may decide during the next window period about its withdrawal if any.
6. **Clause 8.17 :** The vacancy of Executives to be created due to Transfer under Rule 8 transfers, should be added to the outgoing Circle for conducting LICE and the same should be reduced from Circle where this eligible executives is being transferred under Rule 8. - This will help in overcoming the problem of substitutes being faced now in about all Circles as there is no direct or outsider recruitment in BSNL.
7. **Clause 8.18 :** Rule 8 transfers after completion of seven years from Non-tenure and five years at Tenure stations are to be considered to Excess Circles to the extent of 5% of total sanctioned strength of JTOs /JAOs in that particular Circle.
8. **Clause 11.4.11:** In case of such executives opting for continuation of Circle tenure Stations declared by Circle or Soft, Semi Hard and Hard Tenure stations declared by BSNL CO, then his/her OA/BA/Circle stay will be reduced in case of Intra/Inter Circle transfers in case of serving at Circle tenure Stations declared by Circle and break in Circle stay will be granted for executives serving at or Soft, Semi Hard and Hard Tenure stations declared by BSNL CO
9. **Clause 11.4.12:** While counting Circle stay of the executives, the service rendered at Circle tenure Stations declared by Circle or Soft, Semi Hard and Hard Tenure stations declared by BSNL CO should be reduced from the total Circle stay. **Clause 11.4.13:** One year relaxation may be given per Intra Circle administrative transfer issued in respect of that particular executive and his/her Circle stay will be reduced accordingly. **Clause 11.4.14:** The executives working at Circle tenure Stations declared by Circle or Soft or Semi Hard Tenure stations declared by BSNL CO if opt in writing for completion of OA/BA/Circle Tenure, then he will be retained at that tenure station and his/her Circle Tenure will be reduced to the extent of Tenure period declared for that particular Tenure Circle/Semi Hard, Soft Tenure station.

10. **Clause 11.14:** The executives should get the grievances in transfer posting cleared through representations to concerned cadre controlling authorities in BSNL and should avoid approaching court till their appeal is decided by the concerned authorities. The complement authority has to decide all such appeals against transfers within the 30 days period of submission of appeal.
11. **Clause 12.1.1:** For counting Station tenure, the period of service rendered in the previous cadre(s)/ grade(s) would be counted.
12. **Clause 12.1.2:** For Intra Circle transfer, stay will be counted from the date of regular promotion/recruitment into the grade of JTO/JAO and others equivalent to the first level of Executive Hierarchy.
13. **Clause 12.4:** By assessing requirement of Executives and meeting continued shortage of executives, at particular OAs/ stations, the Circle heads are empowered to declare these OAs/Stations as Circle tenure to maximum limit of 25% OAs at a time and meet the shortage of executives accordingly. These Tenure stations/OAs should be reviewed after every four years.
14. **Clause 16: Appealing Authority against victimised transfers:** The executives having grievances if any about transfers issued for him or her, should first represent it through proper Channel to the Office/Officer competent to issue Transfer orders at concerned level. If not satisfied with the review of the competent authority should make appeals which will be decided within 30 days by First and within 30 days by Second Appellate authorities from the date of appeal by the individual.

Sr	Type of Transfer	Competent Authority to issue Transfer order	1st Appellate Authority	2nd Appellate Authority
1.	Intra BA	BA Head	Circle GM HR/ Admn	Circle Head
2.	Inter BA/ Intra Circle	Circle GM HR/Admn	Circle Head	Director HR
3.	Inter Circle	PGM Pers CGM BW/ EW, CGM TF, GM Arch	Director HR	CMD BSNL
4.	Inter Circle	Director HR	CMD BSNL	Secretary DoT

15. **Clause 17: Review of the Transfer Policy:** This Transfer Policy will be reviewed at interval of three years to incorporate changes /additions/ deletions required if any on implementation of this policy or as and when fresh/modified guidelines issued by DoPT/DoT on this subject, whichever is earlier. Provision for review of Transfer Policy on fixed duration of two/three years

Sub: Submission by SNEA on Addition to existing Clauses in Draft Transfer Policy

It is seen that there are chances of wrong/mis -interpretation of the certain clauses/sub clauses due lack of clarity, and there is need of addition of certain words for clarity. The details are as follows.

1. **At the end of Clause 4.3:** This clause of minimum service of two in cases of self/Parent/Close relative Critical illness cases/accidental/Single parent may be relaxed in deserving cases by the concerned authority
2. **At the end of Clause 6.4 (ii):** Submitted and updated as on the last date of submission of application.
3. **At the end of Clause 6.4 (iii):** Except in cases of requests on grounds critical illness cases reported after closure of OTP window.
4. **At end of Clause 8.4:** On implementation of Rule 8 Transfer, employee will be treated as employee of the transferred Circle and he/she will be eligible for next rule 8 Transfers to any Circle including Home/Recruiting Circle only after completion of Five years services in transferred Circle.
5. **At end of Clause 9.1:** recommendations of Circle Head, in any other deserving case, duly recommended by Circle heads with specific justifying grounds with approval of Director (HR) BSNL Board.
6. **At end of Clause 11.4.4:** for administrative Transfers in the interest of service.
7. **Annexure-B:** The exemption from transfers/ retention on transfers as defined under this clause may be please extended to the following deserving cases.
 - a. To the executives suffering from certain infectious contagious diseases like TB (Tuberculosis).
 - b. To the executives requesting on genuine grounds of critical illness the Father/ Mother and Depending in laws
 - c. To the Single parents' female/male having solely dependent wards undergoing education in cases of recent death incidents of husband/ wife.

Sub: Submission by SNEA on Deletion of Certain Clauses in Draft Transfer Policy.

Though we have suggested details of changes to be incorporated in Annexure-I, we are submitting that retain clauses/sub clauses are against interest of the Executives and hence should be deleted and should not be part of the Final Transfer Policy. The details are as follows.

1. **Clause 1.0 (viii):** The sub clause (viii) To ensure continuity of management and systematic succession planning for key posts in middle and senior management level
2. **Clause 2.1.1 (ii):** Job rotation requirement in synchronization with period specified for post, station/ and Circle tenure. Past experience in various functions and the nature of jobs handled.
3. **Clause 2.2:** Word **Purely** in this sentence may be deleted.
4. **Clause 4.2:** the words **in sync with annual IPMS/APAR cycles** may be deleted.
5. **Clause 4.6:** in case employees try to influence transfer and posting through means other than proper channel, action will be taken as per Rule 22 of BSNL CDA Rules. Rule 22 of BSNL CDA Rules provides that “no employee shall bring or attempt to bring any political or other outside influence to bear upon any superior authority to further his interests in respect of matters pertaining to his service in the Company”.- This clause may be deleted. It is difficult for Management to sustain such Political pressure and in many cases, it is seen that Management is biased or under pressure in dealing such political influential cases or cases referred by senior Officers/offices of BSNL/DoT.

OR this clause may be modified as -In case employees try to influence transfer and posting through **Political or other outside influence means, other than proper channel**, action will be taken as per Rule 22 of BSNL CDA Rules. Rule 22 of BSNL CDA Rules provides that “no employee shall bring or attempt to bring **any political or other outside influence** to bear upon any superior authority to further his interests in respect of matters pertaining to his service in the Company”.

6. **Clause 6.5:** No such clause should be introduced and hence may be please deleted. This is normal practice followed in BSNL and no need to incorporate in Transfer Policy for different reasons. It is a fact that there are certain issues in Transfer posting orders issued by any office and naturally from Corporate Office as these transfers are issued on the basis of only office records of stay available with the office. There are always chances of corrections and modifications. In many cases, the Corporate Office is not having updated information about the factual data, local transfers issued and mainly issues faced by the concerned executive are not in the knowledge of the Corporate Office. Hence such extraordinary powers should not be given to any higher office/officer.
7. **Clause 8.14:** The sentence -Therefore, while considering Rule-8 transfer requests in the waiting list for surplus Circles may be ignored **is not correct**. If anyone desires to go on transfer to that specific Circle and do not want to go to any other Circle, then his/her request should be waitlisted in ESS and the next person applying to this Circle will be updated about the pending waiting list to that Circle. Hence this part of the sub clause may be please deleted.
8. **Clause 8.15 (i):** The part However, the instructions stated vide point 8.14 are not applicable on mutual transfer cases under Rule 8 of BSNL Transfer Policy wherever such transfers are otherwise permissible.
9. **Clause 8.15 (iii):** The sentence Single waiting list may be prepared for transfers including spouse ground cases (if Spouse is working in Central Govt., State Govt. & PSU).
10. **Clause 9.1 (d):** Temporary transfer under this rule 9 may be considered only after completion of minimum 03 years of service in the recruiting unit. Transfer under Rule 9 is temporary Transfer that to be considered on genuine grounds defined in

this policy as good HR policy and not to restrict genuine requests. If this condition is imposed at this stage, it will stop operation of Rule 9 transfers and the scope of Rule 9 transfers will be limited to only two years which is not the purpose and aim of introducing Rule 9 Temporary Transfer Policy. Remaining part of this sub-clause is already covered under clause 8.2 above and hence no need of its repetition here.

11. **Clause 14:** There is no need to add this clause 14 as a fresh clause as already it is covered under clauses introduction, aim & objective as above. Exceptions if any should be for a limited period of one year extendable for maximum one more year in case of most deserving cases of excellent and Extra Ordinary Performance as recommended by BA/Circle Head.

Sub: Submission by SNEA for Review of Clauses of Tenure Transfer Policy issued last year:

Ref: Letter No. BSNLCO-PERS/15(11)/6/2020-PERS-I Dated 19/09/2023.

The certain clauses of Tenure Transfer Policy are available in this draft Transfer Policy which makes this transfer policy as partial Transfer Policy. It is need of time that while reviewing the Transfer Policy the Clauses related to Tenure Transfers also needs to be made part of this single and robust Transfer Policy for dealing with transfer Posting of Executives in BSNL.

The tenure period of All India Tenure stations are well defined by DoPT/DoT and BSNL cannot extend it beyond these norms, but it has been enhanced. Further Tenure is applicable for entire Circles and not at SDCA level as applied now. Further all Tenure Policies encourages its staff for joining at Tenure places, but here efforts are made to create pressure of the Executives by enhancing restrictions beyond norms defined by DoPT/DoT.

It may be please noted that other Government /PSU Executives have to work at City places and nobody is posted to SDCA level as being done in BSNL and it was required that BSNL should have reduced the tenure period, but unfortunately Tenure in increased from two years six years. In such condition executive will prefer to opt for nearby Non tenure station by taking benefits of completion of All India tenure and against opt for Tenure station wherein he/she is eligible for Double HRA and other facilities.

The local executives from tenure stations are not getting any such facilities and hence compelling them for six year at such difficult stations and not given break in Circle stay is against all policies of the Government and guidelines of DoT/DoPT and BSNL also has never issued such one sided guidelines earlier, but unfortunately same happened in last review of policy and hence needs corrective action.

We have consolidated the following details about changes required in Tenure Policy and request for incorporating it in this Final Transfer Policy for BSNL Executives.

1. **Clause 2(a):** Tenure Period enhanced as per Clause 2 (a) and 2(b) of Tenure transfer Policy dated may be restored as per earlier Tenure Transfer Policy. The tenure for newly introduced Tenure stations may be maintained in lines with the other existing similar Tenure areas. Tenure period for All India Hard Tenure station should be more than Two years, not more than 2.5 years for Semi Hard Tenure Stations and not more than three years for All India Soft Tenure stations.
2. **Clause 2(a):** Break in the Circle stay defined under clause 3 (b) is granted after completion two Tenures of three years and it should be restored to one Tenure of Three years. The conditions at all these All India tenure stations are worst and it is difficult for anyone including from same Circle executives to give the services effectively in such odd conditions, climate and difficult terrain and it is equally applicable for Executives from other Circles and Same Circles. Hence, compelling the executives to work for six years at such most difficult terrain is unhuman and against HR policies by DoPT /DoT or any other PSU.
3. **Clause 2(b):** As per this policy, BA Choice is given after all India Hard tenure and the same is not available after Completion of All India Semi hard and Soft Tenures. It is requested that BA Choice may be given to Executives on completion of All India Semi Hard/Soft Tenure stations and OA Choice may be given to Executives on completion of All India Hard Tenure stations

4. **Clause 3(a) and Clause 3(b) and Clause 3(d) may be deleted and it may be please modified as:** On completion of prescribed period all India Hard/Semi Hard tenure for the prescribed period by the executives from the same Circle, the facility of Break in Circle stay will be available.
5. **Clause 3(c):** Facility available earlier for Break in the Circle stay after completion of Soft Tenure from the same Circle has been withdrawn under clause 3 (c) and it is requested to restore the same on completion of three years. Here changes may be made by adding executives completing three years tenure will not get in break of total length of services and only their services of three years will be reduced from stay. In case executives serving at tenure Station opts for request transfer on completion of four year tenure at Soft Tenure station, he will be eligible for Break in the Circle stay.
6. **Clause 4:** OK.
7. **Clause 5:** OK.
8. **Clause 6:**
 - a. OK.
 - b. OK
 - c. OK, by deletion of the last sentence starting from -----the prerogative to post To Territorial or Non-territorial overlapping Circle Corporate office - may be deleted.
 - d. Introduction of this hypothetical Circle with a combination of area of different Circles nearby Delhi may be withdrawn and Transfers may be restored to the earlier Transfer policy on the basis of Circle Criteria. It may be please seen that Executives serving at Delhi Capital are not provided accommodation and it is beyond their financial capacity of these executives to possess rented accommodation in this area. Hence daily they are travelling about two to three hours one side journey from home to office and similar time is taken in return journey. In normal course, nobody is able to give time to family even in emergency cases, as families are at far away places from the office location. Further leaving cost in this area is very high and it has direct impact on daily life of the executives. As such, this policy affecting executives from different Circles working in such odd conditions may be given relief by restoration of earlier policy.
9. **Clause 5:** OK.
10. **Clause 6:** OK.
12. **The following additional points may be given consideration.**
 - a. The executives working at Tenure stations i.e. All India Hard/Semi Hard and Soft Tenure stations are excluded from any administrative transfer on basis on stay/Tenure if he/she opts or submits willingness for continuation of services at such tenure places till eligibility for break in Circle/OA stay as the case may be.
 - b. There are binding guidelines issued by then Director HR for Relieving of Tenure completing/completed Executives but the same are not followed by the Tenure Circles/Controlling officers and in many cases the executives are not relieved even after a substitute is joined. The Tenure completed Executives are to be relieved by circle administration within 15 days of Transfer order and if Circle/BA administration failed to do so, the ERP relieving may be done within 30 days through ERP. This may be please incorporated in the Transfer policy under suitable clauses.
 - c. Willing JTOs to be posted as replacement of SDEs and vice versa for considering the Request Transfers to and from All India Hard t
 - d. enure stations.

- e. Requests for Review of soft/semi hard Tenures as per recommendations of Circle Heads may be done as and when received from Circle or once in the year in Month of January.
- f. If transfer of executives already working at All India hard Tenure stations is required on the administrative ground in any extreme case to meet the shortage or exigencies if any, facility of double HRA should be extended to such executives at par with executives joining from other Non-tenure Circles.

Sub: Submission by SNEA about changes required in ERP/EES OTP window:

1. Presently modification of OTP Request is possible only in case of Choice of Circle, but other modifications are not permitted. Hence executives may be given the privilege to modify any content of the OTP application before the final date of extracting data by the BSNL CO or Circle for considering OTP Request
2. At present, executives cannot re-submit the OTP submitted application if withdrawn due to oversight or for making changes in Requests and he/she has to wait for the next window or submit his /her Request through file physically and the same are not given consideration. Hence it is requested that the Executives may be allowed to withdraw and resubmit the OTP request during OTP window period and whatever is final OTP request submitted by him/her may be taken as final request.
3. Executives willing for own cost for Transfers to specific OA under Inter Circle Transfers, then the same may be allowed to opt in OTP window and may be allotted to the extent possible.
4. OTP window should be open during all the days in the year and the Pers Section, Circle heads will extract the final data available on Online Transfer Portal on given dates of that Particular Quarter. Thus, unwanted pressure on ESS/ERP will be reduced. It will also give opportunity to the executives to submit /withdraw the OTP Requests without much tension. Also Management will get update information about
5. OTP applications registered on the waiting list must be published with seniority of application number. While submission of OTP application, there is need of Visibility of Waiting list to particular OA/Circle. The application Number may be given by adding reference of waiting list in application number to that Particular application, so that executives understand that already there are ... number of applications pending to the Circle he/she is opting for and hence can take decision on opting other Circles.
6. Before opening of the next OTP window, previous OTP window requests are to be cleared to the maximum extent and pending requests may be taken forward by maintaining seniority of application.
7. Provision should be made in OTP for Territorial to non-territorial and vice versa in Intra circle transfers with option of OA Choice.
8. Rejection of requests by CGMs/BA Heads or keep on hold the requests and in OTP should be justified by proper reasoning so that decision at higher level can be taken on consideration of Requests. Presently, the OTP Requests are not given consideration if the same are not recommended by BAs/Circles as some officers are biased with certain individuals.
