



**EMPLOYEES' PROVIDENT FUND OFFICERS' ASSOCIATION**  
**EMPLOYEES' PROVIDENT FUND ORGANISATION**  
**MINISTRY OF LABOUR AND EMPLOYMENT, GOVT. OF INDIA**  
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**January 21st, 2019**

To,

**Central P.F. Commissioner,  
Employees' Provident Fund Organisation,  
NEW DELHI 110066.**

**Subject: Annual General Transfers (AGT) 2019 -  
incomplete & misleading tenure-related information  
availability - Regarding**

Sir,

The EPF Officers' Association once again on behalf of the entire officers' community greets you very happy new year 2019 and hopes that the organisation reaches new heights during the coming year.

2. The EPF Officers' Association has had very healthy and engaging meeting with your good self and it has been seen that fruitful work has been initiated on a number of agenda items discussed with you. We are thankful that you had assured a transparent and efficient mode of functioning to EPF officers and this is seen in the timely issuance of circulars on the matter of annual general transfers.

3. Sir, perhaps for a Group-A officer of EPFO, or for that matter of any other service with an all India transfer liability, no career-related issue is more stressful than the issue of transfer. Transfer and posting affects an officer and his family in a manner that goes beyond other long-term concerns. It was with these considerations in mind that the EPF Officers' Association (EPFOA) had successfully lobbied with the Labour Ministry for formulation of a comprehensive transfer policy for EPFO's Group-A officers, and the result was "*Transfer Policy for the cadre of Provident Fund Commissioners*", circulated vide HO circular dated 06.01.2016.

4. A primary goal of the said defined Transfer Policy was to ensure fairness in the matter of transfers, in other words, it aims to protect the officers from any capricious decision of the authority, as well as, to protect the authority from any untoward charge of decision-making on basis of mere whims and fancies, in the matter of transfers.

5. Therefore, with above background in mind, the officers' community was glad that this time around when it came to the matter of annual general transfers (AGT), the EPFO management, in your esteemed leadership, seems to have taken a conscious decision to follow the transfer policy in letter and spirit. The HRM Division, vide circular dated 21.12.2018, had duly asked for officers to submit their options for general and request transfers through electronic mode by 15.01.2019.

6. However, later HO circulars dated 10.01.2019 & 11.01.2019 in the said matter have muddied the waters somewhat, and have thus compelled the EPFOA to call upon you to ensure that the policy as defined by "*Transfer Policy for the cadre of Provident Fund Commissioners*" is truly implemented.

7. The three main issues of concern are listed as below for your kind consideration:

A. *Issue of tenure as on 31st December of the previous year*

Para 4.17 of the policy states that a stay of more than nine months at a station to be computed as on 31st December of previous year shall be treated as a complete year. Prescribed tenures as on 31st December of previous year have been defined in the policy for continuous posting in NCR and in various eight Urban Conglomerate areas across the country. It may be noted that no where in the said policy the tenure at a station is to be counted prospectively upto the 1st April of the year of the AGT. However, the above cited HO circulars dated 10.01.2019 & 11.01.2019, have specified tenures of officers at particular stations as on 01.04.2019. This has created confusion and doubts in the minds of officers. This is, firstly, due to the above stated reason that the policy does not prescribe for counting of tenure as on 1st April but rather provides

for counting of tenure as on 31st December. Secondly, officers who are on the margin of their three year tenures are in the dark as to whether they shall be treated as due for transfer during the forthcoming AGT.

B. Issue of prescribed tenure in NCR, Urban Agglomerates and Zones

Para 4.3 of the policy states that an officer who as on 31st December of preceding year has completed eight years of continuous field posting in eight Urban Agglomerates of NCT of Delhi (including Noida, Gurgaon & Faridabad), Mumbai (including Navi Mumbai & Thane), Ahmedabad, Bangalore, Hyderabad, Pune, Chennai and Kolkata shall be liable for transfer.

Para 4.4. provides that all officers who may have completed as on 31st December of preceding year nine years of continuous stay in NCR (viz. Delhi, Gurgaon, Noida & Faridabad) shall be liable for transfer.

Para 4.7 of the policy prescribes that total tenure of an officer in a Zone shall not be more than nine years.

Now, the circulars related to AGT issued by HO this year, while having provided the tenure of officers at their present place of posting (as on 01.04.2019), have failed to provide any details related to above three Paras. Therefore, a clear picture could not be provided to officers who may wish to submit their preferences for posting in consideration of vacancies that may arise due to transfers effected in compliance of above mentioned paras of the policy. Furthermore, officers who may come into General Transfer zone due to above paras may also have missed out on submitting their preferences due to lack of complete information.

C. Issue of counting of tenure in Group-B service for station tenure

As noted from the station tenures indicated vide above cited HO circulars dated 10.01.2019 & 11.01.2019, tenures spent at a station in Group-B service, prior to promotion to Group-A service, have been also been added for departmental promotee (DP) officers. This is a deviation from the rules of the transfer policy as nowhere in the policy it has been stated that tenure at a station prior to entry into Group-A is required to be counted for purpose of transfers.

8. Sir, as per the transfer policy, the AGT is defined as an annual exercise of examining the tenure and placement of officers and to order transfer or permit overstay of those who have completed post tenure, station tenure or zone tenure.

Without complete transparency and sharing of information in relation to above mentioned concerns, the said exercise opens itself to uncalled-for criticism from various stake holders.

9. Therefore, I request you to kindly ensure that the transfer policy is followed by the organisation in true letter & spirit, and the sensitive issue of transfers is handled in a manner that is beyond any reproach. In order to do so it is required that the complete list of officers with post, station and zone tenures as on 31.12.2018 should be put in public domain by the HRM division as envisioned in the policy. Thereafter, all officers must be provided another opportunity, however brief, to indicate their preferences for transfers so that they may make an informed choice. Strict adherence to timeline is indeed admirable, however, if transfers are ordered by the EOTC on basis of preferences indicated without availability of complete facts than the entire process shall be vitiated.

10. Sir, we have deep faith in your leadership of our organisation and we are hopeful that the same shall be enhanced in the future.

Thanking you.

Yours sincerely,



**[ SAURABH SWAMI ]**  
**Secretary-General**  
**EPF Officers' Association**