



**EMPLOYEES' PROVIDENT FUND OFFICERS' ASSOCIATION**  
**EMPLOYEES' PROVIDENT FUND ORGANISATION**  
**MINISTRY OF LABOUR AND EMPLOYMENT, GOVT. OF INDIA**  
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**August 19<sup>th</sup>, 2022**

**To**

**Hon'ble Chairperson, CBT, EPF /  
Hon'ble Union Minister for Labour & Employment,  
Government of India,  
NEW DELHI 110 001**

**Subject: Appeal for urgent intervention to redress the  
grievances of about 110 EPFO officers due to Annual  
General Transfers, 2022 – regarding**

Respected Sir,

It is submitted that EPFO has recently ordered transfers of 338 RPF-C-I, RPF-C-II & APFCs cadre officers vide orders dated 08.08.2022 as per of Annual General Transfers, 2022 (AGT 2022). Of these 338 officers, about 110 officers, i.e. about 33%, have filed appeals against their transfer orders. This fact of a third of total transferred officers filing appeals highlights the extent of dissatisfaction amongst the officers in respect of above orders. The EPF Officers' Association (EPFOA), therefore, requests your kind intervention in this urgent issue.

2. The broad issues and problems with AGT 2022 are submitted below for your kind consideration:-

**A.** The new transfer policy was hurriedly implemented by the management without any substantive consultation from stakeholders. Mere three days (including Saturday & Sunday) were granted for submission of comments and almost all of the feedback given by the EPFOA was not considered in the final draft without assigning any reason whatsoever.

**B.** Several big Regional Offices like Nasik, Nagpur, etc. have been left functioning with just 2 APFC / RPFC-II level officers due to above transfer orders. While a very high number of Officers have been posted to Head Office, District Offices & PDUNASS (Training Institute) where no core-work with respect to Accounts, Pension, Cash (work related to service delivery to EPFO members) is being done. This has resulted in Claim pendency as well as members' grievances drastically increasing as APFC / RPFC-II level officers have been reduced in 90% of the ROs.

**C.** Most of the District Offices have only one Social Security Assistant (SSA) without even any Section Supervisor (SS). The question of how APFC / RPFC-II is expected to perform critical compliance & recovery functions without any support system in place has been left unanswered. In fact, there are even DOs with absolutely no support staff in place.

**D.** Transfer-Posting this year was done after inordinate delay of more than 3 months in mid academic session. However, despite taking so much time serious blunders were committed such as dead, resigned & absconding officers have been transferred. Also, Officers in the line of promotion as well as those who were transferred by the previous Central PF Commissioner (presently posted as Secretary, L&E / Vice-Chairman, CBT, EPF) with full transfer benefits less than a year ago have been again transferred within a year, putting unnecessary burden on exchequer. Evidently, transfer policy in its implementation has been selectively deployed. For example, rotation between field and non-field postings as per the policy has been ignored, while the concept of transfer on promotion has been enforced. Similarly, the norms for continuous stay at a location/state has been given a convenient go-by.

**E.** Few senior officers were transferred last year to their respective locations with the written assurance that they will be given in-situ promotions and appointed as Zonal ACCs. It is unfortunate that the norms of transfer policy have been applied to their cases and their promotions have been blocked in complete disregard of extant DoPT instructions on holding DPCs.

**F.** EPFO officers have been treated as mere numbers without any consideration to the human angle. An officer suffering from cancer, another officer with 9-months pregnant wife, yet another who is on verge of retirement have been transferred far from their present place of postings despite their representations. Govt. policies on transfer on spouse ground as well as policies for transfer of *Divyangjan* have not even been considered.

**G.** It may kindly be considered that policy intervention without knowledge of the ground realities often ends up as an exercise in self-gratification for those in authority and results in little or no benefit for the intended target group. Wanting to do good must be matched by knowing the right thing to do in the circumstance, and in the case of transfer/posting, be guided by office-centric policies rather than mathematical calculations policies as done in new transfer policy by creating the new concept of "*blocked post*". Due to blocking of posts in most offices, many officers who were

transferred less than a year ago (including those transferred on humanitarian grounds) have again been transferred.

3. Sir, the unprecedented number of appeals filed by a third of the total officers transferred cannot and should not be ignored. It is the urgent and sincere request of EPFO officers' community to direct EPFO management to consider all the appeals on merit and ensure that appeal disposal does not become a mere formality. This would go a long way in ensuring justice for all the aggrieved officers.

Thanking you.

Yours sincerely,

*A. Swami*

**(Saurabh Swami)  
Secretary-General**

**Copy to:**

**Secretary, Labour & Employment / Hon'ble Vice-Chairperson, CBT, EPF -----**  
with request for urgent intervention as above.

*A. Swami*

**(Saurabh Swami)  
Secretary-General  
EPF Officers' Association**