



**EMPLOYEES' PROVIDENT FUND OFFICERS' ASSOCIATION**  
**EMPLOYEES' PROVIDENT FUND ORGANISATION**  
**MINISTRY OF LABOUR AND EMPLOYMENT, GOVT. OF INDIA**  
Regional Office, Ambattur, R-40A, T.N.H.B. Office Complex,  
Mogappair Road, Mugappair (E), Chennai 600 037  
(Regn. No. 33/2015)

Phone: 044 26561127, 9655565892  
Fax: 044 26350544  
WhatsApp: EPF Officers' Association (9655565892)  
PAN : AAAAE7689J

Email: epfoa@gmail.com  
Web: www.epfoa.in  
Facebook: Epfoa India  
Twitter: @epfoaindia

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Date:24.06.2021

To

**Shri Sunil Barthwal, IAS**  
**Central Provident Fund Commissioner,**  
**Employees Provident Fund Organisation,**  
**NEW DELHI 110 066.**

**Sub: Challenges in execution of compliance functions by field offices – disparate portals & ill-equipped technological tools – regarding**

Sir,

EPFO has envisioned in its Vision Statement, released under your leadership, to extend universal coverage of social security to its stakeholders through state of art technology. However, this noble vision can be achieved only if there is effective compliance machinery duly equipped with requisite technological tools. Unfortunately, there is lot left to be desired in this field, and there have been no concerted efforts towards systemic & meaningful improvements in functioning of Compliance, Recovery & Intelligence wing of the Organisation.

The challenges being faced in carrying out the compliance functions are detailed as under for your kind consideration:

**Multiple Portals without any integration**

Presently, the compliance functions are carried out through Shram Suvidha Portal, CAIU Portal, e-compliance proceeding portal and newly introduced e-inspection Portal. All these four portals are functioning in isolation and are not integrated with each other. The inspection reports uploaded on Shram Suvidha Portal do not get updated in CAIU or e-inspection Portal. Similarly, ongoing or concluded cases in e-compliance proceeding portal do not get reflected in other Portals.

The criteria for identifying list under CAIU defaulter list and e-inspection differs. CAIU defaulter list has establishment with upto 24 months default whereas e-inspection defaulter list has 7-11 months default. The recent instructions with respect to e-inspections states that establishments under e-inspections should not be marked for inspection whereas many such establishments are already appearing under CAIU defaulter list creating confusion in the field.

The instructions also states that establishments with highest amount of default should be inspected first but there is no tool/report available for identifying this. Such establishments have to be manually identified by verifying their individual ECRs/Establishment Master which is time consuming, discretionary and avoidable exercise especially when such data is already available in System.

There should be single defaulter list in each portal and any update done anywhere should reflect in all Portals. Ideally, there should be a SINGLE compliance Portal.

#### **Specific Issues with E-Inspection:**

E-Inspection Portal launched with much fan fare is rudimentary & basic in design and features. In almost all ROs, more that 90% establishments have never responded to centrally issued e-inspection notices. Presently, there are no clear guidelines as to what needs to be done in respect of these establishments which continue to remain in default. There is no provision to verify and reject e-Inspection at RO level even when the submission made vide E-Inspection is found to be incorrect. There is no responsibility cast upon the Employers to upload any documents in E-Inspection Portal for examination & verification. E-Inspected Establishments continue to report in Default List post e-inspection.

It is imperative that we make our e-inspection Portal intelligent and integrate with other compliance portals. A facility should be provided to ROs to issue notices through Portal. Had such facility been provided, all ROs could have provided sufficient opportunities to defaulting establishments before proceeding with physical inspection. There is no responsibility cast upon Employer to upload any documents like Attendance & Wage details and Book of Accounts. Provision should have been given to upload documents and submit details with respect to employees, Wages through fillable forms. Besides, all Employers should have been asked to upload their annual Wage figures as per Wage Register and as per their Book of Accounts explaining the difference, if any, in form of statutory annual return. System based intelligent verification (data analytics) should be done on all such returns which shall not only detect huge evasion but also give peace of mind to complying establishments.

#### **Specific Issues with ABRY & Principal Employer Portal:**

There has been repeated directions to get all establishments registered as contractors on ABRY on the Principal Employer Portal. However, there are certain issues in ABRY implementation. First of all, majority of the declarations are wrongly filed as one can find educational establishments & hotels registered under contractors. As per the ABRY Scheme, any establishment declaring oneself as contractor needed to also declare the details of Principal Employers. But, it seems that this important prerequisite was done away with in the System. Had this been there, possibility of wrong declaration would have minimized as well as details of Principal Employers would have readily available thereby making it much more effective in reaching out to these Principal Employers in focused manner.

Presently, in absence of Principal Employer details with respective ROs, the entire process is mechanical, non-intelligent & low yielding. ROs first call the contractors, collect details of Principal Employers and then contact the Principal Employers requesting to upload contractor details on Principal Employer Portal. Several contractors do not respond or simply say that they are not contractors. Many Principal Employers are beyond the jurisdiction of ROs thereby there is no control of respective ROs on such Principal Employers thus creating difficulty in getting the work done. With such blunted tool, how can it be possible to complete the task within a given time frame?

#### **CAIU Issues**

A separate Central Analysis & Intelligence Unit (CAIU) was constituted during 2014 for increasing coverage & membership through targeted database of establishments by creating linkages with other enforcement agencies. Initially the CAIU Unit was functioning well and several establishments under Railways, Armed Forces, CBSE, etc were brought under the purview of the Act. However, now this Unit is almost defunct. Even the routine functions of granting permission for inspections were not done since last more than one and half years. And upon intervention of

Secretary(L&E), the functions with respect to grant of permission were simply delegated to Zonal Offices.

**Miscellaneous Issues**

Even though MIS Portal for compliance was launched during 2013 wherein Blue Book, Red Book & RRC details is maintained through System, there is no clarity whether physical registers are to be maintained or not.

Head Office keeps asking for miscellaneous reports on very short notice through email & Google spread sheet rather than extracting details from e-compliance proceeding portal or MIS Portal or Shram Suvidha Portal.

Despite such constraints the field functionaries are trying their best to implement the provisions of the Act & Schemes, however, threatening them that their APAR shall be spoiled was in very bad taste and against the spirit of team work & leadership. In view of above, I fervently appeal to your good self to put in place integrated state of art technological tool for execution of compliance functions in order to achieve Organisational goal on urgent basis.

Yours sincerely,



**(Saurabh Swami)**  
**Secretary General**