



EMPLOYEES' PROVIDENT FUND OFFICERS' ASSOCIATION
EMPLOYEES' PROVIDENT FUND ORGANISATION
MINISTRY OF LABOUR AND EMPLOYMENT, GOVT. OF INDIA
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May 1st, 2022

To,

**Ms. Neelam Shami Rao, IAS,
Central Provident Fund Commissioner,
Employees' Provident Fund Organisation,
New Delhi 110066**

Subject: Reconsideration of proposed transfers of certain category of officers in the upcoming AGT who were transferred to present place of posting during last AGT – Regarding

Ma'am,

Transfers in EPFO, as in any other service, have a major impact on not only the career of the officer concerned but his family too. Children's education & upbringing, spouse's job, all are intricately linked to and are affected by the transfer of the officer. With above firmly in focus, the EPF Officers' Association (EPFOA) has been trying to ensure that annual general transfers (AGT) are effected in a manner that aligns the organisation goals and the individual officer's familial & official duties. It is in this context that the EPFOA had submitted comments to draft transfer policy vide letter dated 28.02.2022 and also submitted a request for reconsideration of imbalanced distribution of vacancies vide letter dated 08.04.2022. However, it does not appear that the suggestions submitted vide above letters were accepted.

2. Of course, it is the prerogative of the management to conduct the AGT in any manner that seems fit. However, it may kindly be considered that if the same is conducted while acknowledging that transfers are an exercise that affect the entire family of an officer and that the suggestions of the EPFOA are the result of compiled requests of the EPF officers' community, the transfer exercise shall result in maximum satisfaction levels and general increase in organisational effectiveness.

3. Accordingly, the EPFOA again humbly requests that following issues may kindly be considered while conducting the AGT this year :-

A. HO Letter No. HRM-II/T-1(2)2022/E-File No. 47399/4506 dated 05th April 2022, in its para 7 has stated that even those APFCs who were appointed in supernumerary posts and have been regularised recently are being considered for transfers, even though they have been transferred to their present place of posting in August 2021. Since in their case no change in work profile or substantive promotion is involved and they have been working in the same cadre since long, their inclusion in the list of officers likely to be transferred would not achieve any purpose. This should not be considered as the case of promotion on transfer and therefore the officers falling into this category may kindly be given exemption from AGT.

B. Recently many of the APFC were promoted to the posts of RPFC-II. Though the norm of promotion on transfer is well accepted, in the present case most of the officers were recently transferred (in August 2021) and they have not completed their tenures. Moreover, there has been functional interoperability between posts of RPFC-II and APFC since 2019. Therefore, even at the next place of posting these officers would be discharging similar functions. Such large-scale displacement of officers at huge expenditure of EPFO would not achieve much in terms of the nature of roles and functions. Therefore, such officers may be retained on the present location till completion of their tenure.

C. Another important issue is that all the posts of the organisation has been distributed across the offices and bifurcated into "Assigned" and "Blocked". But there are very few offices in which number of officers are more than the assigned category. Most of such officers have not completed their tenure and they were transferred under earlier Transfer Policy in rule bound manner and were promised security of tenure in terms of that policy. The chief goal of even the present policy is to

implement Supreme Court directives in the T.S.R. Subramaniam case which gives security of tenure to the officers. Therefore, it would be proper that security of tenure is given priority over and above the distribution of sanctioned posts. Distribution of “assigned” and “blocked” posts may be achieved in phased manner in coming years. Moreover, this dislocation would not achieve really much as the number of officers occupying posts over and above assigned posts are low, but for the officer concerned it would involve great personal, psychological and social cost.

4. If above mentioned suggestions are accepted, it would save EPFO great expenditure and at the same time it would not hinder with the functional goals which are being sought to be achieved by the present AGT. Therefore, it is requested that only those officers should be considered for AGT who have completed their tenure at the present station and are due for transfers accordingly.

Thanking you.

Yours sincerely,



[Saurabh Swami]
Secretary-General