

SUGGESTIONS AND RESPONSES ON NEW TRANSFER GUIDELINES

	Suggestion	Response
Mr. Mangalaxmi	1. To consider mutual transfers on completion of tenure of 5 years in public interest. 2. Udaipur to be considered for 'Punishment transfers' 3. Spl consideration in case the distance to home town from the current place of posting is more than 25 hours of journey by train. 4. Spl consideration in case of dependent aged parents 5. Spl consideration in case of only girl child 6. Consideration of transfer on spouse ground even when spouse is employed in private sector. 7. Posting in hard stations beyond 5 years even on personal request to be rejected or restricted to 7 years. 8. Restrictions to be made in number of postings in hard stations. 9. Employees should not be displaced before completion of tenure of 5 years for the sake of choice posting of employees who served in hard stations. 10. In case of transfer request on spouse ground, the transfer requests should be restricted to a specific number rather than employees availing that benefit repeatedly.	
2. Manas J. Chutia	1. Transfer on PwBD grounds as per RPWD Act 2016	
3. Dalibandhu. P	1. Provision for choice posting to all employees who have completed the prescribed tenure at their present stations. Employees may also be allowed to give 3 to 4 preferred Stations, in order of preference. In cases where more than one employee opts for the same station, the requests may be considered on the basis of the prescribed point-based priority system, as mentioned in the draft guidelines under the point (point no. 05) stating that "the criteria and weightage may be adopted for prioritization," subject to the availability of vacancies and administrative requirements, if any.	
4. Amit Kumar Ghosh	1. As the posts in AnSI do not fall under an 'organized cadre-based service', the rules of the Rotational Transfer Policy (RTP) may not be applicable and complied to non-cadre-based services. Hence, the term "RTP" should be deleted. 2. Regarding hard area postings (Post Blair and Shillong), AnSI should follow standard DoPT tenures, which are clear and specific. As per DoPT guidelines, hard area tenures may be as follows: - o 3 years (for those who have completed less than 10 years of service prior to the hard area posting). - o 2 years (for those who have completed more than 10 years of service prior to the hard area posting). 3. As per serial number 4 of the draft guidelines, the post of H.O.O. is to be declared a 'sensitive post'. However, the grounds for declaring H.O.O. a sensitive post are unclear. In AnSI, H.O.O. is not a standalone post; it is an additional	

	portfolio assigned to an officer. If this designation is due to financial and administrative powers, then the DDO post may also be declared a 'sensitive post'. o Furthermore, due to a shortage of senior officers in AnSI, transferring all H.O.O.s after 3 years may not be feasible. Thus, the clause could be modified to read: <i>"Both the H.O.O. and DDO should be replaced with other suitable officers at that regional center every 3 years."</i> 4.The marking system proposed in serial numbers 5 and 6 may be dropped, as linking APAR gradings, publications etc with transfer criteria involves unrelated parameters. Regarding transfers on spouse grounds, standard DoPT norms should be followed; otherwise, the current proposal inadvertently encourages employees to marry only within the organization. This marking scheme adds unnecessary complexity. 5.Instead, like many other departments, AnSI could constitute a Transfer Committee to review all transfer applications bi-annually and submit recommendations to the competent authority. 6.Serial number 8 of the draft is not in line with standard norms. If we are promoting tenure-based postings (5 years) at each regional center (except hard areas), completing the prescribed tenure should qualify an employee for a transfer in the 'public interest'. Otherwise, tenure-based postings lose their purpose. Hence, if an employee requests a transfer after completing their prescribed tenure, they should preferably be transferred in the public interest. 7.Serial number 9 of the draft is unrelated to transfer guidelines and should be dropped. Separate DoPT guidelines already govern promotions, acceptance of promotions, extension of tenure, withdrawal of promotion offers etc. 8.Several sentences in the draft transfer guidelines are ambiguous and open to multiple interpretations. This ambiguity should be minimized. Furthermore, it is proposed that an internal scrutiny committee be constituted to review these draft guidelines alongside all comments and representations received.	
5. Rajkumar	1.Prioritizing transfer requests on exceptional medical grounds of family members and dependents.	
6. Mojungla	1. Special consideration of transfer requests on exceptional medical grounds of family members and dependents rather than through point-based transfers. 2. Reconsideration of mandatory transfers for HoO every 3 years especially for senior employees. 3. Transfer on PwBD grounds	
7. V.K.Singh	1. Restricting Hard Station Postings to one, unless employee volunteer or exceptional administrative circumstances so require. 2. Gender-Neutral Spouse Transfer Policy 3. Review considerations in Promotion-Linked Transfers 4. Transparency in Discretionary Transfers by documentation of reasons of transfer.	

	5. Priority for Employees with Disabilities and Serious Medical Conditions.	
8.Krishna Bhati	1. Restricting Hard Station Postings to one, unless employee volunteer or exceptional administrative circumstances so require. 2. Gender-Neutral Spouse Transfer Policy 3. Review considerations in Promotion-Linked Transfers 4. Transparency in Discretionary Transfers by documentation of reasons of transfer. 5. Priority for Employees with Disabilities and Serious Medical Conditions. 6. Consideration of transfer to stations nearest to their native place in case of Multi-Tasking Staff (MTS) and Lower-Paid Employees: 7. Consideration of transfer requests on Spouse Employment irrespective of whether the spouse is employed in the Government, public sector, private sector, or any other recognised organisation.	
9.Banita Behara	1. Choice posting in case of completion of prescribed tenure. 2. Mandatory transfers for HoO and DDO every 3 years. 3. Weightage to unmarried women employees taking care of dependent parents on the lines of spouse grounds. 4. Alternative criteria for points in case of museum staff.	
10.Surabhi Verma	1. Preferential treatment to Employees with disabilities. 2. Multi-Tasking Staff (MTS) and lower-paid employees to be considered for postings closer to their hometowns. 3. Transfer requests based on spouse's job location should be considered even if the spouse works in private or non-government employment and not restricted to the type of employer.	
11. Preeti Bala	1. Restricting Hard Station Postings to one, unless employee volunteer or exceptional administrative circumstances so require. 2. Gender-Neutral Spouse Transfer Policy 3. Review considerations in Promotion-Linked Transfers 4. Transparency in Discretionary Transfers by documentation of reasons of transfer. 5. Priority for Employees with Disabilities and Serious Medical Conditions. 6. Multi-Tasking Staff (MTS) and lower-paid employees to be considered for postings closer to their hometowns.	
12.Umesh Kumar	1. RTP is not clear. Further, if it pertains to point or weightage calculation, then it is not required. 2. On completion of the prescribed tenure, whether at a hard station or at any other station, an employee should ordinarily be transferred in the public interest, irrespective of whether he or she has submitted a request for transfer.	
13. Mopada Nani Babu	1. The concept of hard posting should be reviewed considering varying views and changes in the cities with time, as it appears to create obstacles in constructive transfers.	

14. Narayana Rao Bonthu 15. Kanike Veerashekar 16. Gin Khan Khual 17. Gangarapu Sandhya 18. Sagar Kodi 19. Saloni Uniyal 20. Anup Raj K 21. Narasimhan N	2. While the point-system seems to be proposed to include different needs and thereby prioritise transfers in a just manner, the variable nature of specific needs may not allow it to happen as intended. For instance, the spouse-based posting may be according to the DoPT guidelines. 3. Health condition and medical needs of the employees and their family members and education facilities for the children of the employees may be given due priority in transfer cases. 4. The request of the employees who are expecting children or who have recently become parents may be given due consideration for or against their transfer. 5. The allotment of points for academic research should give primacy to fieldworks and report writing clearly recognising the actual contribution of an employee. In doing so, the length of the fieldwork and effort in report writing may also be duly considered. 6. Considering APAR points for transfer may not give the intended results. 7. If possible, mutual transfer policy may be made lenient towards employees considering the number of centres and the number of the employees. 8. Every employee may be given the opportunity to mention 3 preferred locations for transfer. Measures such as considering geographic and linguistic diversity of the candidates can be taken at the stage of posting itself in order to lower the rate of transfer requests. This would also affect the quality of the fieldworks positively. 9. Publishing the vacancy details and transfer related matters periodically may help the employees in deciding about their transfers. 10. Most of the issues that arise pertaining to transfers are rooted in the lacunae in distribution of posts of different cadres, possibility of promotion and size of the organisation. If the number of centres/stations is increased and an even and fair distribution of the centres across various regions of the country is done, along with an equally fair distribution of posts across the centres, it may finally resolve most of the issues in general and those related to transfers in specific.	
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