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**State Bank of India Officers' Association
(Patna Circle)
Regd No. 1872 of 1972
REGISTERED UNDER TRADE UNION ACT – 1926**

All letters to be addressed
to the General Secretary

State Bank Building
2nd Floor, Local Head Office
West Gandhi Maidan,
Patna-800001

CIRCULAR NO.55 /2025

DATE : 27.10.2025

TO,
ALL MEMBERS

Mandatory Learning & Certification: Request for consultative redesign, phased implementation, and safeguards (Ref.: STU e-Circular No. CDO/STU-MNDTRY LEAR/2/2025-26, dated 30 Aug 2025)

We reproduce hereunder the text of the AISBOF Circular No. 55 dated 27.10.2025, the contents of which are self-explicit.

With warm greetings,

(Amarendra Vikramaditya)
GENERAL SECRETARY

OUR UNITY : ZINDABAD-ZINDABAD
S.B.I.O.A. : ZINDABAD-ZINDABAD

TEXT

Mandatory Learning & Certification: Request for consultative redesign, phased implementation, and safeguards (Ref.: STU e-Circular No. CDO/STU-MNDTRY LEAR/2/2025-26, dated 30 Aug 2025)

We have sent a communication to the Deputy Managing Director (HR) & Corporate Development Officer, State Bank of India, Corporate Centre, Mumbai, on the captioned subject.

The content of the communication is reproduced below.

With Greetings,
Yours Comradely,


(Rupam Roy)
General Secretary

To,
The Deputy Managing Director (HR) & CDO,
State Bank of India
Corporate Centre
Mumbai.

Dear Sir,

Mandatory Learning & Certification: Request for consultative redesign, phased implementation, and safeguards (Ref.: STU e-Circular No. CDO/STU-MNDTRY LEAR/2/2025-26, dated 30 Aug 2025)

The AISBOF aligns with the Bank's objective of strengthening professional standards and line up with the capability building initiative of the Bank with regulatory expectations. Our members have always engaged in learning with pride and purpose and appreciated quality enhancement that is considered paramount for individual as well as the organisational growth. However, we are deeply concerned about the method of implementation of the initiative which at times turns out to be forcible rather than being supportive and engaging. This communique thus draws justification to aid our concerns about the manner in which the Mandatory Learning & Certification framework has been introduced through the above-referenced circular. We would therefore, appreciate an immediate and collaborative course correction that protects equity, operational continuity, industrial harmony and at the same time be prolific and purposeful.

The policy stipulations, as can be drawn from the referred communication, calls for completion of one Role-Based Certification (or, where applicable, an RBI-mandated certification course) along with ten specified e-lessons, with no pro-rata credit affiliation. Officers who fail to complete all the courses, by 31 January 2026 are doomed to face forfeiture of the 5-in-1 allowances (non-reversible for the missed months); CDS grades may also be stepped down; and promotion eligibility in 2026-27 is contingent on securing the full five marks from mandatory learning. These are high-stake levers that our members experience as punitive rather than developmental approach, coercive, aiming at rapid test completion rather than genuine capability building and human resources augmentations. The circular also discontinues the earlier two-day training holiday, even when the framework becomes more demanding, which compounds the perception that the system is forcible and not facilitative.

We are equally concerned about the infrastructure and its feasibility. Examinations are on web-only in SPARK under AI-based **remote proctoring**, requiring a laptop/desktop (no mobiles or tablets), a functioning webcam and microphone, stable connectivity, full-screen lock, and continuous monitoring with video/image capture and automated flagging. With exam centres withdrawn, many officers, especially in rural and semi-urban branches have been ordained to struggle for finding a quiet space, peripherals, or bandwidth to attempt exams during duty hours. In all practicality such protocols shall surely nudge the staff toward using personal devices and home internet outside working hours, shifting the responsibility entirely to the employees.

Learning flourishes when it is driven by purpose, pride, and professional curiosity, not when it is compelled under threat of forfeitures or conducted under intrusive surveillance. A system that ties education to punitive outcomes and AI-proctored monitoring risks shifting attention from mastery to mere compliance, undermining psychological safety and eroding trust. Instead, the Bank should cultivate intrinsic

motivation by restoring on-duty learning time, recognising effort and improvement, and offering supportive coaching and feedback. Autonomy in choosing learning pathways, clarity on expectations, and fair opportunities to practice and retry will yield far better capability outcomes than high-stakes deterrents. In short, development should be an enabling journey, not an enforcement mechanism; when officers feel respected and supported, they will invest in learning that genuinely strengthens risk culture and customer service.

The calendar further intensifies these constraints. A hard stop of 31st January 2026 for officers, with the peril of allowance forfeiture triggered thereafter, coincides with the Q3 closing which considered to be the most happening quarter with audits, festival-season workloads, business augmentation, making it as the busiest period for the branch network. Further, removing on-duty training time and in contrary imposing AI-proctored testing in this window risks stress, service disruption, and an end-of-cycle rush that undermines learning quality and genuine quality enrichment for the staff.

Accessibility and equity gaps also require an immediate attention. Annexure-I describe certain groups as “completely exempted,” yet concurrently insists that the same category of officials in RBI-mandated roles complete the relevant certification within the same timelines, with proviso of disincentives applying on non-completion. This contradiction disproportionately affects officials with disabilities or those on long medical or maternity leave and creates ambiguity for colleagues close to retirement. The circular is silent on bilingual/assistive formats, additional time, screen-reader compatibility, captioned content, or human-proctor alternatives, despite “Communicating, Persons with Disabilities” and the DPDP Act featuring among the ten e-lessons.

Concerns of natural justice and data protection arise from the malpractice clause and surveillance model. “Use of unfair means” can lead to deletion of results from HRMS/SPARK, debarment from further attempts, disciplinary action, downgrading of CDS grades, and even **reversion of promotion** if established post-facto, yet the circular does not define clear thresholds, spell out an appeal path, or guarantee human review before adverse action where AI flags are involved. Annexure-K confirms continuous monitoring with snapshots and object detection, but the circular offers no DPDP-compliant notice covering purpose limitation, retention, storage location, or user rights.

We must also point out that issues related to Mandatory Learning & Certification and linked entitlements are sub judice before the Hon’ble Calcutta High Court. Proceeding with tight deadlines and disincentives during ongoing litigation risks eroding trust and disturbing industrial harmony. Our request is to keep punitive elements in abeyance pending judicial clarity, while we work jointly on improvements that uphold regulatory intent.

Constructively, we propose a collaborative reset.

- (1) The management may constitute a joint Working Group (STU, HR, Operations, and AISBOF) to agree on timelines, infrastructure standards, inclusion and accessibility norms, malpractice definitions with a two-stage appeal, and a DPDP-compliant privacy framework.
- (2) To adopt a **readiness-first** approach: Complete circle-wise audits of infrastructure (exam pods, webcams/headsets, bandwidth, backup internet), access (on-duty learning slots), and inclusion (accommodations fulfilled)

before linking Mandatory Learning & Certification to CDS marks, allowances, or promotion, activating such linkages only after a circle evidences readiness.

- (3) To re-time the learning cycle: Create 90–120-day windows that **avoid quarter-ends**, and restore **on-duty learning** so that capability building does not come at the cost of customer service.
- (4) To provide **infrastructure and alternatives**: Exam pods at SBILDs/RBOs/LHOs with human-proctored options where AI-proctoring is unstable; SPARK pre-checks for bandwidth.
- (5) To ensure **fair attempts and remediation**: Three free attempts, do not count attempts lost to verified technical failures, and embed coaching before retakes.
- (6) **To make exemptions meaningful**: No penalties should apply to exempted categories, including those in RBI-mandated roles, until reasonable accommodations and revised timelines are provided, with bilingual and assistive materials available across modalities.

As immediate steps, we request that Management convene the joint Working Group; **suspend punitive linkages** (5-in-1 allowance forfeiture, CDS grade step-down, and promotion ineligibility) and readiness audits are completed and revised timelines arrived at; issue an advisory clarifying that officers will not be compelled to use personal devices or home internet and that centre-based/human-proctored alternatives will be available where needed; and publish a DPDP-compliant privacy notice alongside a clear, time-bound appeals process before further AI-proctored examinations are conducted.

AISBOF reiterates its commitment to partnering with the Bank to deliver genuine learning that strengthens risk culture and customer trust. We believe that a dialogue-led, phased, and readiness-first implementation, paired with on-duty learning, accessible design, privacy safeguards, and due process, will achieve the regulatory objective without compromising fairness or operational stability. We seek an early meeting to finalize the path forward.

With regards,

Yours sincerely,

Sd/-

(Rupam Roy)
General Secretary