Mobile Number

President : 9431205645

General Secretary: 9835452010

स्टेट बैंक ऑफ इंडिया ऑफिसर्स एसोशिएशन

State Bank of India Officers' Association

(Patna Circle)

Regd No. 1872 of 1975

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.79 /2026 **DATE : 03.09.2026**

TO,
ALL MEMBERS

COMPULSORY ONBOARDING OF OFFICERS IN SMGS-IV AND ABOVE ONTO THE CBDC/E₹ WALLET FOR PAYMENT OF ENTERTAINMENT ALLOWANCE

We reproduce hereunder the text of the AISBOF Circular No. 79 dated 03.09.2026, the contents of which are self-explicit.

With warm greetings,

(Amaresh Vikramaditya)
General Secretary

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

TEXT

COMPULSORY ONBOARDING OF OFFICERS IN SMGS-IV AND ABOVE ONTO THE CBDC/E₹ WALLET FOR PAYMENT OF ENTERTAINMENT ALLOWANCE

We have sent a communication to the Deputy Managing Director (HR) & Corporate Development Officer, State Bank of India, Corporate Centre, Mumbai-400021, on the captioned subject.

The content of the communication is reproduced below.

With Greetings,

Yours Comradely,

(Rupam Roy)
General Secretary

Letter No. 6180/20/26 **Date: 03.09.2026**

The Deputy Managing Director (HR) & CDO,
State Bank of India, Corporate Centre
State Bank Bhavan, Madame Cama Road,
Mumbai – 400021.

Dear Sir,

Compulsory onboarding of officers in SMGS-IV and above onto the CBDC/e₹ wallet for payment of Entertainment Allowance

With effect from May 2026, the Bank has operationalised payment of Entertainment Allowance to officers in SMGS-IV and above through the CBDC/e₹ wallet, and instructions in circulation require 100% onboarding of these officers onto the CBDC platform, with a uniform mobile number across CBS, HRMS and CBDC, as the sole route for receiving the allowance. The stipulated date has passed, and officers who have not opened an e₹ wallet are consequently facing non-receipt of, or uncertainty over, an entitlement admissible under the Service Rules, for months that have already elapsed.

We support RBI's Digital Rupee initiative and the Bank's right to offer e₹ wallets to its officers on a voluntary basis. Our objection is confined to compulsion**. An officer cannot be required, as the price of receiving an allowance to which he or she is otherwise entitled, to install and maintain a retail banking application on a personal mobile device, dedicate a personal mobile number to it, open a personal e₹ wallet and participate in an RBI pilot, with no non-CBDC alternative**. We place the following for your consideration.

1. An officer's obligations under the SBI Officers' Service Rules, 1992 are discharged through the Bank's own infrastructure like CBS, HRMS and Bank-provided systems. Nothing in the Rules or the contract of service requires an officer to own a smartphone, maintain a particular mobile number, keep that number uniform across the Bank's databases, or install any application on personal property. Requiring a personal phone's use for such objectives shifts the cost of the device, data and upkeep, the cyber-security risk and the liability for any compromise onto the officer, without consent, compensation or indemnity.

2. RBI itself has kept CBDC credit of allowances voluntary for its own officers. By circular CO.HRMD.No.G.54/S11295/16.33.00/2024-25 dated 27.12.2024, RBI decided to credit the internet/data reimbursement to the CBDC wallets of its officers in Grade 'A' to 'F' "who have opened CBDC wallet with their Bank", stated its object as being "to encourage the use of CBDC wallet", merely "advised" officers to update wallet details in the Samadhan portal, and confirmed that "all other terms and conditions governing the Scheme remain the same". By circular CO.HRMD.No.G.57/S12520/16.33.00/2024-25 dated 03.02.2025, RBI commenced the facility from February 2025 "for those Officers who have provided their CBDC wallet details". Neither circular contains any deadline, onboarding target, mobile-number alignment requirement or consequence for non-enrolment; the Samadhan portal permits an officer to delete wallet details; and RBI officers may hold their wallet with any bank of their choice from a list of participating banks. The regulator that owns the e₹ pilot has thus, when applying the very same "employee allowance" use case to its own officers, kept enrolment opt-in, left the conventional route intact and imposed no captive-bank requirement. A 100% mandate by SBI goes well beyond what RBI considered appropriate for itself.

3. The mandate does not appear to carry competent-authority sanction under Rule 29, which provides that the Bank may reimburse entertainment expenses “as may be decided by the Central Board or the Executive Committee”. Making the entitlement conditional on a personal CBDC wallet is a substantive change in the conditions governing the benefit, and an administrative note directing onboarding does not evidence such sanction.

4. Rule 50 requires compliance only with orders that are “lawful and reasonable”, and the present direction reaches beyond the workplace into an officer’s private smartphone, personal mobile number, personal banking linkage and device security. Its reasonableness cannot be sustained when a less intrusive and equally effective alternative, direct credit to the salary account, itself a digital channel of the Bank, already exists and is the very alternative RBI has retained for its own officers.

5. The direction must also satisfy the constitutional and statutory standards of proportionality and consent. As an instrumentality of the State, SBI remains bound by Articles 14 and 21 of the Constitution in its dealings with its officers. Any measure that touches an officer's informational privacy and personal autonomy must therefore satisfy the threefold test of legality, legitimate aim and proportionality recognised by the Supreme Court. A blanket mandate with no opt-out, enforced through the withholding of a service benefit, fails the least-restrictive-means limb of that test when direct credit to the salary account achieves the same object without any intrusion. The Digital Personal Data Protection Act, 2023 reinforces this position: consent for the processing of personal data must be free, specific, informed and unambiguous, <u>and consent obtained on threat of losing an admissible allowance is not free consent.</u> Nor does the Act's employment-purpose exception assist the Bank, since it covers processing necessary for the employment relationship itself, not the enrolment of employees as retail customers of a financial product.

6. Retail e₹ remains a pilot and may be programmable. RBI’s Digital Rupee FAQs (updated 29.04.2026) describe e₹ as “currently being pilot tested” in a limited, controlled rollout intended in part to test user acceptance, and RBI is exploring programmable CBDC for “employee allowances for defined purposes” with expiry dates, merchant-category and geographical restrictions. Compelled enrolment cannot measure acceptance, and the Bank must clarify whether the allowance will be ordinary or programmable e₹, because a programmable credit is not economically identical to money in a bank account and would alter the benefit itself rather than merely its mode of payment.

7. The scheme raises informational-privacy concerns and risks practical exclusion. Compulsory linkage of service identity, HR records, banking relationship, mobile identity and wallet identity, and the demand for a uniform number across CBS, HRMS and CBDC, call for prior disclosure of the data collected, application permissions, employer visibility of transaction data, retention periods and safeguards against use of wallet data for monitoring or profiling. RBI’s own scheme operates purely on the officer registering wallet details in the HR portal, showing that such integration is unnecessary. The mandate is silent on officers who use basic phones, hold a separate personal number, face device-security or accessibility constraints, or legitimately wish to limit their digital financial footprint.

In the light of the foregoing, we request the Bank to withdraw the requirement of 100% compulsory onboarding for officers in SMGS-IV and above and to make e₹ enrolment voluntary, on the lines of RBI's circulars dated 27.12.2024 and 03.02.2025. The Bank may kindly confirm that no officer shall be required to install any application on a personal device, dedicate or align a personal mobile number, or open an e₹ wallet as a condition of receiving Entertainment Allowance or any other admissible benefit; that no such benefit shall be withheld, delayed or forfeited for non-enrolment; that Entertainment Allowance be released forthwith to non-onboarded officers through the salary account; that no adverse or financial consequence shall follow the lapse on non-onboarded officers; and that direct credit to the salary account, or the existing reimbursement mechanism, shall continue for every officer who does not opt for CBDC.

A voluntary, transparent rollout, exactly as RBI has adopted for its own officers, would strengthen both employee confidence and genuine adoption of the Digital Rupee.

With best regards,

Yours sincerely,
Sd/-

(Rupam Roy)
General Secretary