

# **Challenges in Employment of the Visually Impaired in Indian Public Sector Banks**

Review of Implementation of Government  
Guidelines and Way Ahead



**Equality and Dignity**

Visually Impaired Bank Employees  
Welfare Association (VIBEWA)

2016

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## **About VIBEWA**

Visually Impaired Bank Employees Welfare Association (VIBEWA) is an association of visually challenged people working in the banking, insurance and other financial sectors in India. VIBEWA is the first association in the country formed exclusively for the empowerment of visually challenged employees in the banking and financial sectors.

VIBEWA is registered under the West Bengal Societies Registration Act, 1961. Regd. No. S2L 17175 Estd. 2014 and has its head quarters at Kolkata.

VIBEWA started its journey in 2009 as an online E-group (VIB-India, Visually Impaired Bankers of India) with just two members. Now the group has more than 600 members from almost all the public sector banks from various parts of the country. The founders of VIBEWA are visually challenged bank employees working in various public sector banks in the country.

The objective of VIBEWA is to enhance the productivity of visually challenged employees in banking and other financial sectors by ensuring for them a conducive work environment which involves proper job identification and job mapping, provision of assistive technology like screen readers, accessibility of internal software and systems, special training for using computers, provision of human assistance wherever indispensable, etc. VIBEWA also focuses on protection for visually challenged employees against unwarranted transfers, removal of illogical impediments in promotions, securing reservation in promotions, provision of adequate disability related allowances, etc.

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# About This Report

(For submission to concerned ministries in the Government of India)

Disability is created as a result of interaction of individual differences in body and mind and the prevailing social, attitudinal and physical infrastructure at a given time.

So, for example not being able to see does not necessarily result in not being able to read, write and do myriad other tasks usually done visually provided the required assistive technology is made available.

However, if things are done in their usual visual way only in hard copy, for example, file notings, vouchers, forms, and all other documents in the office, the blind employee will feel left out totally and be marked as being unproductive or perceived as a non-performing asset. However, if all these things are done in electronic mode or required human assistance is provided for reading, etc., blind employees can do as much if not more, as their sighted counterparts.

Thus, it is adoption of inclusive practices and infrastructure which can give the needed impetus to visually impaired (VI) bank employees and the required accessible work environment and convert them into fulfilling and fulfilled employees.

Blind and low vision persons have been working in Indian banks since long but many have joined only since the beginning of this century as 3% vacancies for persons with disabilities, including 1% for blind and low vision persons, have been reserved in all government jobs including banks vide section 33 of Persons With Disabilities (Equal opportunities, protection of rights and full participation) Act, 1995. The effort of the banks in recruiting persons with disabilities including the visually impaired is praiseworthy even though the required strength of 1% of VI employees is still not achieved in banks.

However, right from recruitment to retirement, there are myriad junctures where a visually impaired employee strives to prove herself or himself and where all of us, including your good selves, can pitch in to make it a mutually beneficial endeavor. It is for this purpose that we have organized ourselves into VIBEWA to engage meaningfully with all stake holders including yourself.

There do exist legal and professional standards in almost all the major countries including USA, UK, Australia and India about not only reserving jobs and affirmative action for persons with disabilities but providing them reasonable accommodation, assistive technology, accessible and inclusive work environment, and non-discrimination.

Here, we have tried to capture the actual lived experiences of visually impaired bank employees at their work place, and have tried to match them with what is mandated legally as well as by good practices along with what your good selves had to say. We commissioned a large survey of visually impaired bank employees on our website in September and October 2015, and also obtained information from all the public sector banks about recruitment, Training, assistive technology, accessibility, non-discrimination, etc. using RTI applications. We present our understanding of various challenges faced by VI employees at present along with our suggestions to improve the work experience of VI employees by implementing existing guidelines and also by carving out innovative solutions wherever required.

We hope your honors would take this humble appeal of ours in good faith and bring about a positive change not only in the lives of VI bank employees but in the entire sector as they form an integral part of the same.

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# **1. Executive Summary**

## **1.1. Introduction**

Blind and low vision persons are employed in banks in India since 3% vacancies for persons with disabilities (PWD), including 1% for blind and low vision persons, have been reserved in all government jobs including banks, vide section 33 of Persons With Disabilities (Equal opportunities, protection of rights and full participation) Act, 1995. Though there exist many laws and government guidelines including the latest Office Memorandum (OM) issued by the MOF in November 2014 [Ref. 15] for the empowerment and welfare of visually impaired (VI) bank employees, implementation of such statutes and guidelines leaves much to be desired. Therefore, VIBEWA commissioned a large survey of visually impaired bank employees on its website in September and October 2015, and also obtained information from all the public sector banks about recruitment, training, assistive technology, accessibility, non-discrimination, etc., using RTI applications. The study aims at bringing to light the status of implementation of laws and guidelines pertaining to VI bank employees based on information obtained from banks using the RTI Act, and the responses of VI bank employees gleaned from the primary data collected. The following are the major findings from the study and suggestions by VIBEWA to address the issues found.

## **1.2. Major findings**

- In recruitments since 1996, only 0.47% of the employees are visually impaired as on March 31, 2015, as against the mandatory 1%. In terms of grade, VI employees constitute 0.40% at officer cadre, 0.63% at clerical level, and a meager 0.16% at sub-staff level.
- With regard to the overall strength of VI employees in banks, they comprise only 0.29% of the total staff strength; 0.24% at officer cadre, 0.44% at clerical level, and 0.10% at the sub-staff level, far below the stipulated quota of 1%.
- None of the banks has representation of PWDs on interview boards, and most of them do not sensitize the interview panel about disability issues.
- Most of the respondents of the survey did not receive any pre-recruitment training.
- Ten banks either did not impart induction training or did not furnish information on the same in response to RTI queries.

- Twelve banks did not impart regular training or furnish information on the same in response to RTI queries. In most banks, only around 50% of the employees were provided regular training.
- In almost all the banks, there were respondents who reported that they were not imparted pre-promotion training.
- In 21 banks, no respondent or very few of them were imparted training on assistive technology. Fifteen banks stated they did not provide such training and four banks did not reply to this RTI query.
- 21 banks stated either they did not impart pre-promotion training or do not have information on the same.
- Respondents reported performing jobs like manning the enquiry desk at branches, loan recoveries, follow up roles in controlling offices, faculty in training units, HR managers, etc.
- Almost 85% of respondents say jobs were not identified or were partially identified.
- 33% of respondents were not consulted while assigning their present job.
- More than 50% respondents reported their job is not suitable for them.
- More than 70% of respondents were not provided human assistance for performing their job.
- 22 banks stated in RTI that they do not have a policy of identifying jobs for the VI.
- More than 50% of employees have not been provided any screen reading and OCR software which are basic essentials for the VI employees to perform their jobs.
- In around twenty banks, a screen reader is either not provided or provided to very few employees.
- 30% of respondents need magnifying software but have not been provided.
- In most banks, respondents reported that assistive technology is not updated to newer versions.
- 62% of respondents say that internal applications and sites are fully or partially inaccessible.
- In their replies to RTI queries, none of the banks said that all their internal applications and portals are compliant with W3C standards.

- In almost all the banks, employees reported lack of Braille displays, audio inputs and easily navigable passages for internal navigation.
- In most of the banks, respondents reported that they have not been given first posting in their native place.
- In most of the banks, respondents reported they are not exempted from routine transfers.
- In most of the banks, respondents reported they are not exempted from transfers on promotion.
- In many banks, respondents reported discrimination in promotions.
- In some of the banks, a few respondents reported non-provision of scribe and extra time in promotion examinations.
- In most of the banks, respondents reported that mandatory operational, rural and branch head assignments are hurdles in promotions.
- In many banks, no VI employee or very few reported to have got promotions.
- In their response to RTI queries, only ten banks stated that VI employees are exempted from mandatory assignments; other banks either do not exempt or did not reply to the query.
- Banks' response to RTI queries revealed that there are hardly any officers at higher scales like scale 3 and above, indicating that VI employees are not provided equal opportunities.
- In most of the banks, special casual leave is not provided to VI employees.
- In seventeen banks, there are employees who reported they were not paid emoluments as per their eligibility.
- In eighteen banks, employees reported that special conveyance allowance is not paid. In many banks, employees were not even aware of such a provision.
- Even the above allowance of Rs. 400 PM is not sufficient to meet the traveling needs of VI employees; only 3% said it is sufficient and 46% of respondents incur between Rs. 2000 and Rs. 5000 PM.
- 90% of respondents reported that MOF guidelines were not internally circulated or they were not aware of the same.
- 15 banks stated in response to RTI queries that they have a liaison officer for PWD. However, respondents from many banks reported that there is no liaison officer for PWDs.

- In many banks, respondents reported that grievance redressal cell for PWDs is not available.

### **1.3. Suggestions**

- Banks should have a liaison officer and conduct special drives for filling backlogs to ensure mandatory 1% recruitment of VI employees in addition to reserving 1% vacancies. Interview panel should have representation of PWDs and be sensitized about the capabilities of VI persons and be informed about assistive technology.
- Banks should provide pre-recruitment and pre-promotion training to VI employees on par with SC/ST employees. Induction and regular training should be provided to VI employees also along with other employees.
- Special training on assistive technology must be provided for VI employees, in collaboration with NGOs, if needed.
- A proper job mapping exercise needs to be undertaken for VI employees in banks, considering the degree of disability, available assistive technology, and the extent of accessibility. VIBEWA's "Jobs for VI" document (Ref. 14) can be used as a starting point for this purpose.
- Banks should provide screen readers, magnifiers, OCR software and other assistive devices for blind and low vision employees and update the software and hardware at periodic intervals. Such procurement may be centralized to ensure uniformity and economy.
- Banks should be guided by a policy to ensure accessibility of internal applications, sites, etc., at the development stage itself and ensure the same even in further upgrades. Accessibility audit to be conducted to ensure compliance with international standards in this regard like W3C
- Braille displays and audio inputs to be available in bank buildings for easy navigation. All staff members to be sensitized through trainings about supporting the VI at work place.
- All banks should follow the MOF guidelines on transfers and formulate internal transfer policy exempting VI employees from routine transfers and on promotions. VI employees must be consulted for their choice when transfer is inevitable.
- Annual Performance Review (APR) of VI employees to take into consideration Key Result Areas (KRAs) as per jobs identified, assistive technology and human

aid, accessibility etc. VI employees should not be discriminated in promotions due to mandatory assignments.

- PWDs should be provided reservations in promotions.
- Banks must provide special casual leave to VI employees and the process of availing it has to be hassle-free.
- Banks should increase the special conveyance allowance from Rs.400 PM to a reasonable amount to meet the actual expenditure and ensure that all PWDs get it without any hurdles.
- Banks should provide a reasonable amount from staff welfare to VI employees for purchasing devices like smart cane and other electronic gadgets required in their daily lives.
- Banks must be directed to compensate for expenses of escort when VI employees travel on official duty.
- Banks should have a liaison officer and a grievance redressal cell and widely circulate information about the same to all employees. Such a set up should ensure that all government guidelines are implemented in letter and spirit right from recruitment of 1% VI employees to all other government schemes and address issues that VI employees face in the process.

## **2. Recruitment**

Section 33 of the PWD Act provides for 3% of vacancies to be reserved for PWDs, 1% each for VI, Hearing Impaired (HI), and Orthopedically Handicapped (OH) persons. RTI queries filed with banks reveal the adherence to the said section in recruitments since 1996 till December 31, 2014, (after enactment of PWD Act). This is given in the following sections.

### **2.1. Reservation for PWDs**

Out of a total of 3,13,066 persons recruited since 1996 in the public sector banks (PSBs), PWDs comprise only 1.87% as against mandatory 3%. VI employees comprise 0.46%, HI employees 0.30%, and OH employees 0.98%. This shows that while the OH are recruited almost to the full quota of 1%, just under half the quota for the VI, and a little over a quarter of the quota for the HI have been met.

#### **2.1.1. Bank-wise analysis**

Out of 28 banks, apart from Syndicate bank, no other bank has fulfilled the mandatory quota of 3% PWDs. Only nine banks recruited at least 2% of PWDs, and Central Bank of India and Dena Bank did not recruit even 0.5% PWDs.

#### **2.1.2. Bank-wise recruitment of VI employees**

Only two banks, Allahabad Bank and SBM, recruited close to the mandatory quota at 0.96% and 0.97%, respectively. Thirteen banks did not recruit even 0.5% VI employees, and the Bank of Maharashtra and IDBI did not recruit even 0.10%.

#### **2.1.3. Cadre-wise recruitment of VI employees**

Out of 1,34,398 officers recruited in all banks since 1996, Only 0.40% comprise VI employees. Allahabad Bank ranks first with over 1% of officers being VI, followed by Syndicate Bank at 0.93%. In twelve banks not even 0.5% officers are VI. Bank of Maharashtra, SBT and IDBI did not recruit even 0.1% VI employees.

Out of 1,22,026 clerks recruited since 1996, only 0.63% comprise VI employees. Only six banks recruited more than 0.75% VI employees, eight banks between 0.5% and 0.75%, three banks recruited between 0.25% and 0.5%, and three banks less than 0.25%. The rest of the banks did not reply to our RTI query related to this. To sum up, fourteen banks did not recruit even 0.75% VI employees in clerical cadre.

Out of 40,121 sub-staff recruited, only a paltry 0.16% comprise VI employees. Out of eighteen banks that provided information about recruitment, seven banks did not

recruit even a single VI employee at this cadre. Eight banks did not provide information in response to this question.

Annex 1, Sheet 1 contains data given by the banks in response to RTI queries about the recruitment of PWD and VI from 1996, when the disability act came into force.

## **2.2. Overall strength of PWDs in banks**

While the previous section outlined the reservation followed for PWDs since 1996, this section describes the strength of PWDs in banks as on March 31, 2015, based on information given in response to RTI queries.

Out of 7,71,595 employees in PSBs as specified in response to RTI replies, only 1.67% comprise PWDs. 0.29% are VI, 0.19% are HI, and 1.18% are OH. This shows that even after twenty years of the enactment of the PWD Act, the strength of VI and HI employees in banks is meager, far below the desired level.

### **2.2.1. Cadre-wise strength of VI employees in banks**

Only 0.24% out of 3,13,744 officers, 0.44% of 3,01,581 clerks and 0.10% of 1,38,970 sub-staff comprise VI employees in PSBs. This shows that even after twenty years of the enactment of the PWD Act, and despite the large recruitments in the recent years, the percentage of VI employees is not even half the desired level at clerical level and not even a quarter at the officer and sub-staff levels.

Annex 1, Sheet 2 contains information about the total strength of VI employees in banks.

## **2.3. PWD representation on interview boards**

In response to our RTI query filed in this regard, almost all the banks indicated that there are no government guidelines regarding representation of PWDs on interview boards and they do not have any such policy.

### **2.3.1. Sensitization of interview panels about disability**

Only four banks, namely Corporation Bank, Dena Bank, Bank of Maharashtra and IOB said they sensitize the panel members to disability issues to some extent or the other. Central Bank of India said that the panel is being informally sensitized about it. Indian Bank, SBBJ and SBM stated the panel is sensitized about vacancies reserved for PWDs. Union Bank of India and PNB stated that government of India guidelines are being followed. Other banks either stated that they don't have any such policy or did not reply to the query.

## 2.4. Government guidelines

Section 33 of PWD Act, 1995 clearly provides for reserving not less than 1% vacancies in all establishments for blind and low vision persons, and reads as under:

“(Reservation of posts.)

Every appropriate Government shall appoint in every establishment such percentage of vacancies not less than three per cent. for persons or class of persons with disability, of which one per cent each shall be reserved for persons suffering from

- blindness or low vision,
  - hearing impairment, and
  - locomotor disability or cerebral palsy,
- in the posts identified for each disability.

Provided that the appropriate Government may, having regard to the type of work carried on in any department or establishment, by notification subject to such conditions, if any, as may be specified in such notification, exempt any establishment from the provisions of this section.”

Banks are not exempted from section 33 of the PWD Act and the central government has duly identified posts in banks vide its lists in 2001, 2007 and the latest list in 2013.

Section 32 of the same Act duly provides for identification of posts in which persons with various types of disabilities including blind and low vision persons may be appointed, and reads as under:

“(Identification of posts which can be reserved for persons with disabilities.)

Appropriate Governments shall

- identify posts, in the establishments, which can be reserved for persons with disability;
- at periodic intervals not exceeding three years, review the list of posts identified and update the list taking into consideration the developments in technology.”

Thus, it is incumbent upon the banks to duly appoint at least 1% VI persons in the total number of vacancies filled right from the year 1996 when the Act came into force. But they have started attempting to fulfill this statutory obligation only since the first decade of 21<sup>st</sup> century and as a result, the required 1% strength of VI employees is yet to be achieved.

OM of the Department of Personnel and Training (DoPT) dated December 29, 2005 lays down guidelines for filling up such reservation quotas.

The supreme court of India in Civil Appeal No. 9096 of 2013 (arising out of SLP (Civil) No. 7541 of 2009), Union of India & Anr. Versus National Federation of the Blind & Ors, has clearly directed “51) Thus, after thoughtful consideration, we are of the view that the computation of reservation for persons with disabilities has to be computed in case of Group A, B, C and D posts in an identical manner viz., “computing 3% reservation on total number of vacancies in the cadre strength” which is the intention of the legislature. Accordingly, certain clauses in the OM dated 29.12.2005, which are contrary to the above reasoning are struck down and we direct the appropriate Government to issue new Office Memorandum(s) consistent with the decision rendered by this Court.”

## **2.5. Suggestions**

- a) It should be ensured that banks necessarily recruit 1% blind and low vision persons in jobs in all cadres, including the sub-staff cadre where the situation is dismal.
- b) Banks should have a liaison officer to monitor reservation for and recruitment of PWDs including blind and low vision persons as in the case of SC/ST reservations.
- c) As the required 3% strength of PWDs and particularly 1% of VI employees and 1% of HI employees is yet to be achieved, banks should launch special recruitment drives to recruit VI and HI persons and meet this mandatory legal requirement sooner than later.
- d) Even though there are no specific guidelines to have representation of PWDs on interview boards, it is desirable to have one on the board to test the special skill set of the disabled, at least when the posts are reserved for PWDs as is done in the case of SC/ST/women employees. The panel has to be sensitized about the mandatory reservation, jobs identified for PWD,, assistive technology, etc., that concern the disabled.
- e) The number of backlog vacancies for PWDs including the VI and the actual number of vacancies filled by way of backlog or fresh recruitment are to be displayed on the website of the banks.

## **3. Training**

### **3.1. Pre-recruitment training**

#### **3.1.1. Situation on the ground**

In most of the banks, 70-80% of our survey respondents did not receive any pre-recruitment training. In Corporation Bank, Dena Bank, IDBI and SBBJ, not even a single employee was given pre-recruitment training, and 96% of employees were not trained in SBH. This shows most of the respondents did not receive any pre-recruitment training.

### **3.2. Induction training**

#### **3.2.1. Situation on the ground**

75% of respondents of our survey were given induction training, and around 25% of the employees were not given induction training at par with other colleagues. In Syndicate Bank, UCO Bank and SBBJ, 100% of respondents were given induction training, and 95% of respondents in BOB were given induction training. In Allahabad bank, Bank of Maharashtra, PNB, SBT, SBH and United Bank of India more than 40% of respondents were not given induction training.

Annex 1, sheet 5 contains information gleaned from banks' RTI responses and survey data on training..

#### **3.2.2. What the banks say**

Out of 27 banks, sixteen banks say they provided induction training. Allahabad Bank, BOI and SBP stated that information is not available, and the remaining seven banks did not reply or the reply was not relevant to the question.

### **3.3. Regular training**

#### **3.3.1. Situation on the ground**

In most of the banks, only 50 – 65% of our survey respondents are imparted regular training at par with other colleagues. In Central Bank of India. Dena Bank, and SBI, more than 75% of respondents were imparted regular training. In Allahabad bank, Canara Bank, IOB, PNB, Union Bank of India and United Bank of India, fewer than 50% were imparted regular training, and this number at SBH is a dismal 18%.

### **3.3.2. What the banks say**

Fourteen banks stated that they have provided regular training to VI employees. Central Bank of India and SBH stated that not even a single VI employee was provided any regular training. Allahabad Bank, BOI and SBP stated that information on the same is not available, and the other seven banks did not reply to the question.

## **3.4. Training on assistive technology**

### **3.4.1. Situation on the ground**

Respondents from ten banks namely Allahabad Bank, BOI, Dena Bank, Oriental Bank of Commerce, Punjab and Sind Bank, United Bank of India, Syndicate Bank, SBT, SBBJ and RBI reported absolutely no training on assistive technology for the VI. Seven banks namely Andhra Bank, Canara Bank, Corporation Bank, Indian Bank, IOB, SBM and SBP had respondents of whom around 10% or fewer were imparted such training.

59% of respondents from SBI, 81% from SBH, 59% from Union Bank of India and 32% from BoB were imparted special training on assistive technology for the VI. Central Bank of India, PNB, IDBI, UCO Bank and Vijaya Bank had respondents of whom 25-30% were given this special training.

Annex 1, Sheet 3 contains information gleaned from banks' RTI responses and survey data on training on assistive technology.

### **3.4.2. What the banks say**

Only eight banks namely BOB, Central Bank of India, PNB, SBBJ, SBI, Union Bank of India, Vijaya Bank and PNB say they provided special training on screen readers to VI employees. 15 banks stated they did not provide any such training and 4 banks, Andhra Bank, IDBI, Punjab and Sind Bank and UCO Bank did not reply to the question.

## **3.5. Pre-promotion training**

### **3.5.1. Situation on the ground**

80% of respondents from Dena Bank, 47% in Allahabad Bank, 33% in BOI, 20% in PNB, 66% in UCO Bank and 25% each in SBI and RBI were provided pre-promotion training. BoB, Bank of Maharashtra, IDBI, OBC, Punjab and Sind Bank, Vijaya

Bank, SBM and SBT are the banks in which not even a single respondent received pre-promotion training.

### **3.5.2. What the banks say**

Only six banks stated that pre-promotion training is provided to VI employees. Central Bank of India, Corporation Bank, OBC, Indian Bank, SBBJ, SBM and Union Bank of India stated that no VI employee was provided pre-promotion training. Allahabad Bank, BOI, SBI and SBP stated that information on the above is not available. Andhra Bank, BOB, IDBI, Dena Bank, PNB, Punjab and Sind Bank, SBT and UCO bank did not provide any information.

Annex 1, Sheet 5 contains information gleaned from banks' RTI responses and survey data on training.

### **3.6. Government guidelines**

Guidelines contained in MoF IOM F.No.3/13/2014-Welfare dated November 18, 2014 [Ref. 15], state that VI employees and PWDs should be provided induction training together with other employees.

It also states that job specific post-recruitment and pre-promotion training should be provided to PWDs. Training syllabus and duration may be finalized in consultation with national institutes under the departments of disability affairs, MSJE and, if necessary, prominent organizations in the sphere of disability.

It also states that training should be imparted at the time of change in jobs, introduction of new technology and also post-promotion.

Also, the employee with a disability shall be placed with an experienced employee for at least one month on resuming responsibility of a post. This would help him/her to pick up skills required to perform the job and also the adaptations that may be required in individual cases.

### **3.7. Suggestions**

a. Pre-recruitment training: Government guidelines do not specifically mention pre-recruitment training to PWDs. However, some of the banks have been providing such training in recent years. It is desirable to issue government guidelines for provision of such training to PWDs in line with mandatory training provided to SC/ST employees.

b. Induction training: It is the first interaction of an employee with an organization. Hence it is imperative to include the VI in such trainings as a principle of inclusion at that very stage. Moreover, this should be a platform to educate the

VI about various aspects that concern them at their work place, for example, facilities available, assistive technology, promotion opportunities, etc.

- c. Training on assistive technology: While reservation ensures employment of PWDs, it wouldn't serve any purpose if it is not followed by proper hand-holding after recruitment. Considering the lack of availability of special training on screen readers/magnifiers in the country, banks need to invariably follow up the provision of assistive technology with training on the same. They can collaborate with reputed NGOs who provide similar training to the VI.
- d. Pre-promotion training: While sighted employees have exposure to various tasks performed in banks, visually impaired employees are deprived of such opportunity due to their obvious limitation. As a result, there is little scope for activity-based learning for them. Hence academic inputs before the promotion tests are imperative. All banks need to provide pre-promotion training to VI employees along with SC/ST employees.
- e. Regular training: It goes without saying that VI employees must be provided regular trainings with all others at specific intervals as they are an indispensable part of workforce. For the regular training to be meaningful, accessible training materials and interface should be ensured.

## **4. Job Identification, Job Mapping, Hand-holding**

### **4.1. Situation on the ground**

#### **4.1.1. Job identification**

27.70% of the respondents of our survey say jobs are “not identified formally”, whereas 30.10% say “identified partially”, 9.60% say “identified but not implemented”, 5.10% say “identified but not assigned”, 3.80% say “identified only tele-caller job”, 12.80% say “not aware”, and finally, a meager 10.90% of respondents say “identified all tasks we can do using present technology”.

In ten banks, namely, Allahabad Bank, BOI, Corporation Bank, Dena Bank, IDBI, OBC, PNB, Punjab and Sind Bank, RBI, and SBBJ, 50% or more respondents say jobs are not formally identified. In another ten banks, namely, Andhra Bank, BoM, Canara Bank, SBI, SBH, SBM, Syndicate bank, United Bank of India, Union Bank of India, and Vijaya Bank, fewer than 25% respondents say so. In the remaining seven banks this percentage is between 25 and 50.

#### **4.1.2. Consultation while assigning the role**

67.7% of the VI respondents said they were consulted while assigning them the specific job role they are performing at present. Only 32.3% said they were not so consulted. Five banks, namely, Bank of Maharashtra, Corporation Bank, Indian Bank, RBI, and SBT have VI employees of whom even half did not report being consulted, whereas there are seven banks, namely, BoB, BoI, Canara bank, Central Bank of India, IDBI, SBM, and Vijaya Bank where more than 75% surveyed employees reported being consulted while assigning them the job. The rest of the banks surveyed fall between 50% and 75%.

#### **4.1.3. Suitability of job tasks**

47.5% of VI employees surveyed say the present job tasks are suitable for them, 15% say they are not, and 37.5% say they are partially suitable.

25% or more of the employees of four banks namely OBC, Punjab and Sind Bank, SBP, and Syndicate Bank have opined that the job they are assigned is not at all suitable for them. Between 10 and 25% employees of fifteen banks feel that their job is not suitable and fewer than 10% employees of remaining eight banks opine so.

While delineating various job tasks they perform, our survey respondents have covered a gamut of various tasks right from market intelligence and research to

helping customers in a branch. The areas in which the vi are commonly posted are manning enquiry desk in branches, loan recovery, marketing, and follow-up in controlling offices, faculty in training centers, HR, and the age-old stereotype job of telephone operators. However, worryingly, many have also explicitly stated that they are not given any meaningful job role and feel utterly irrelevant at their desk. A few have reported outright neglect and ridicule as well. Still others have stated that doing tasks like passing cheques, dealing with cash, and doing such other tasks which are perilous to say the least for visually impaired persons, given the current state of technology. All this may be due to ignorance on the part of stake holders about the potential of visually impaired persons and suitable assistive technology and accessibility. It is precisely our role through this report to spread awareness and meaningfully employ VI workforce in banks.

#### **4.1.4. Human aid**

28.5% of VI employees surveyed say they are provided human aid at work place, but an overwhelming 32.7% say they are not. 29.9% say they are provided sometimes and only 8.9% say they don't require it.

50% or more of surveyed employees of five banks, namely, Andhra Bank, BoI, Bank of Maharashtra, Punjab and Sind Bank, and RBI reported receiving no Human aid at workplace whereas in nine banks, namely, Dena Bank, IDBI, IOB, SBBJ, SBI, SBM, SBT, Syndicate Bank, and Vijaya Bank, 25% or fewer employees said so. The remaining thirteen banks figured somewhere between 25% and 50% in this regard.

#### **4.1.5. Guidance from colleagues**

Out of the total respondents, 50.1% VI employees said they don't get guidance always.

In twelve banks, more than 50% respondents reported full co-operation from colleagues while it is 50% or fewer in other banks. Out of the total respondents, only 1.3% respondents reported facing humiliation and 2.6% reported apathy and neglect by colleagues.

#### **4.1.6. Issues of VI women employees**

Visually impaired women employees have reported a few issues arising out of the interaction of disability and gender, like customers coming too close to them. A sensitive approach taking into account the twin factors of disability and gender and devising measures like placing tall counter (instead of a small table) in front of VI female employees working as customer care executives is the need of the hour.

Annex 1, Sheet 4 contains information gleaned from banks' RTI responses and survey data about job mapping, consultation, job suitability, and human aid.

## **4.2. What the banks say**

Corporation Bank informed us that it follows the guidelines issued by MSJE. SBH and SBI say that they have a job identification policy for PWD, SBM said that it has a policy for job identification but it is not communicated to its operational units. Syndicate Bank has informed us that it is following the government guidelines and has given a list of jobs identified for different cadres.

Apart from these five banks, all other banks admitted that they don't have any policy for job identification and job mapping for VI employees.

Thus, it is revealed that there is much to be done on banks' part as almost all PSBs, barring a few, are yet to formulate any policy or undertake the process of job identification and job mapping.

## **4.3. Government guidelines**

1. Section 32 of the PWD Act 1995, reads as under:

"32. Appropriate governments shall -

(a) Identify posts, in the establishments, which can be reserved for the persons with disability.

(b) At periodic intervals not exceeding three years, review the list of posts identified and update the list taking into consideration the developments in technology."

2. Ministry of Social Justice and Empowerment vide their notification No.16-25/99-NI-I, dated 31.5.2001 identified posts in various establishments including Public Sector Banks and revised them vide 16-70/2004-DD,III dated 18.1.2007 and 16 – 15/2010-DD.III. dated 29 July, 2013.

3. Government of India, Ministry of Personnel, Public Grievances and Pensions, Department of Personnel and Training issued IOM No.36035/3/209-Estt. (Res) dated 31.03.2014, which was subsequently forwarded to all PSBs/PSICs/FIs, NABARD, IBA, RBI, and PFDRS vide their letter no. F.No.3/13/2014-Welfare dated 18.11.2014 by Ministry of Finance Deptt. Of Financial Services for information and compliance. Its Para 2B speaks as follows:

"Each Ministry/Department of the Government of India, their attached and subordinate offices, Central Public Sector Enterprises, Cantonment Boards etc. should identify the types of jobs which could be easily performed by them

specially for Group B, C and D posts where the number of jobs are more. Such persons should preferably be posted to perform such identified jobs and they be allowed to continue performing such jobs, as far as possible. If the concerned PWD officer could perform all the jobs as people without disability or could perform several types of jobs efficiently, no effort should be made to instruct them to certain types of jobs only.”

Thus, in addition to identification of jobs, government guidelines provide for proper job mapping to facilitate optimum performance by disabled employees as well as their retention in such jobs.

#### **4.4. Suggestions**

As apparent from banks' response to RTI queries and survey data, almost none of the banks has any policy for identifying job roles and tasks suitable for VI employees. As a result, they are not able to utilize the potential of VI employees. Consequently, VI employees are either unrealistically expected to perform at par with sighted colleagues or are totally excluded from any productive activity. In order to address this situation, we propose the following:

- a. MOF should monitor and follow up with all banks for ensuring proper implementation of para 2B of IOM in letter and spirit.
- b. A proper job mapping exercise needs to be undertaken for VI employees in banks, considering the degree of disability, available assistive technology, extent of accessibility and other factors. Suitable job roles may be identified/ created for them, and postings accordingly given. The process of multi-factorial job mapping may include factors like jobs identified by appropriate government, level of accessibility in a particular task, work experience of a particular employee, etc.
- c. All banks must constitute an expert committee/group within their banks with fair representation of VI employees for identifying and mapping job roles suitable for them. Reputed organizations/industry associations of disabled can also be made part of this exercise.
- d. Banks may collect information about the areas where VI employees are performing satisfactorily and prepare a standard document listing all such tasks for reference. Job cards can also be prepared delineating how a job role can be performed by a VI employee.
- e. In this endeavor VIBEWA can play a crucial role. We have prepared a comprehensive list of jobs/tasks based on actual work experience of hundreds of

VI employees in their banks. This may be used as a standard catalog. VIBEWA shall be updating this document from time to time on its Web site. [Ref. 14]

- f. Employees should be properly consulted while assigning them any job role and appropriate human aid at work place should be provided.

## **5. Assistive Technology**

### **5.1. Situation on the ground**

#### **5.1.1. Screen reading software**

Out of 536 respondents only 242 (45.10%) have been effectively using JAWS whereas 7.60% do not require it for their present assignment. Remaining 43.30% respondents are in need of screen reading software but have not been provided with it.

Out of these 242 employees, 9 are from Andhra Bank, 23 from BOB, 37 from Canara Bank, 11 from PNB, 31 from SBH, 73 from SBI, 7 from RBI, and 10 from Union Bank of India. Thus, a total of 201 employees (83.05%) out of 242 are from only eight banks. Only 41 employees (16.95%) from as many as 19 remaining banks reported effective use of JAWS.

This unmet need for screen reading software which forms the core of effectiveness for any VI employee is much more pronounced in the following fourteen banks as 50% or more of the respondents say they have not got it, namely: Allahabad bank, BOI, BoM, Corporation Bank, IDBI, Indian Bank, OBC, Punjab and Sind bank, SBBJ, SBP, SBT, Syndicate bank, UCO bank, and Vijaya Bank. In remaining twelve banks fewer than 50% respondent say so.

#### **5.1.2. Optical Character Recognition (OCR) software**

Only a meager 9.10% of our survey respondents from all the 27 banks are effectively using OCR, whereas 40.50% don't require it for their present assignment. Remaining 50.40% respondents do require OCR but have not been provided with it.

This unmet need for OCR is much more pronounced in the following sixteen banks as 50% or more of the respondents say they have not got it despite their requirement, namely: Allahabad Bank, Andhra Bank, BOI, BoM, Central Bank of India, Dena Bank, IDBI, Indian Bank, IOB, OBC, PNB, SBH, Syndicate Bank, UCO Bank, Union Bank of India, Vijaya Bank, . In remaining eleven banks fewer than 50% of our respondents say so.

#### **5.1.3. Magnifying software and devices**

Only 8.90% of our survey respondents are using magnifying technology, whereas 60.30% say they do not require it for their present assignment. This is so, as majority of our respondents have blindness of extent 80% or more and magnifying

technology is useful only to some low vision persons who can see enlarged text. Remaining 30.70% VI employees have not got magnifiers even though they require it.

This unmet need for magnifiers is much more pronounced in the following six banks as 50% or more of the respondents say they have not got despite requirement, namely: Allahabad Bank, Andhra bank, BOI, SBH, SBP, and United bank of India.

#### **5.1.4. Updation of assistive technology**

In this fast changing era, assistive technology has to be updated continually to keep up with the dynamic technological scenario and also to improve accessibility of various sites and softwares.

31.70% of our respondents say that assistive technology is not updated in their banks. This is more pronounced in six banks, viz Allahabad Bank, Andhra Bank, BoI, SBH, , SBP, and United Bank of India, where 50% or more of the respondents say so. Except four banks, namely, Punjab and Sind Bank, RBI, Syndicate Bank, and Vijaya Bank, where fewer than 25% of employees surveyed say so, in the remaining seventeen banks between 25% and 50% employees say assistive technology is not updated.

Annex 1, Sheet 3 contains information gleaned from banks' RTI responses and survey data on assistive technology.

### **5.2. What the banks say**

Allahabad Bank, BOI, Indian Bank and IOB say they have not provided any screen reader. Union Bank of India does not have information on this matter.

Information about banks that have purchased JAWS software is given along with the number of licenses against the number of VI employees in brackets.

BOB: 93 (203), BOM: 2 (20), Canara Bank: 102 (157), Central Bank of India : 17(107), Corporation Bank: 17 (66), Dena Bank: 30 (41), PNB: 85 (180), SBBJ: 30 (35), SBH: 67 (70), SBI: 453 (538), SBM: 18 (19), SBP: 12 (32).

OBC has provided NVDA (a free screen reader) to 10 of its 44 VI employees. Bank of Maharashtra is the only bank which said it has provided magnifying glass to its low vision employees.

### **5.3. Government guidelines**

Assistive technology forms the core of enabling work environment for VI employees. This vital area is aptly highlighted in the following directives:

2. Section 38 (d) of the PWD Act 1995 reads as below:

“Health and safety measures and creation of a non-handicapping environment in places where persons with disabilities are employed.”

3. GoI, Ministry Of Social Justice And Empowerment (Department of Disability Affairs) vide their notification No. 16 – 15/2010-DD.III. dated 29th July, 2013 under item 2 (iv) advised all Ministries/Departments/Public Sector Undertakings as follows:

"(iv) Keeping in view the principles of reasonable accommodation, government departments should ensure accessible environment including providing suitable or appropriate hardware and software as well as required assistive devices to the persons with disabilities to enable them to perform their assigned duties."

Earlier also, Government of India, MSJE vide their Notification No. 16-25/99-NI-I, dated 31.5.2001, and their Notification No.16-70/2004-DD, III dated 18.1.2007, under item 5 advised all Ministries to provide assistive devices to PWDs to perform their jobs effectively.

4. GoI, Ministry of Finance Deptt. of Financial Services vide their letter no. F.No.3/13/2014-Welfare dated 18.11.2014 issued direction to all PSBs/PSICs/FIs., NABARD, IBA, RBI, PFDRA, which in its Para 2C speaks as follows:

“The persons with disabilities could perform their duties efficiently if they are provided with aids and appliances which are suitable to their needs. Ministries /Departments and their attached and subordinate offices, Central Public Sector Enterprises, Cantonment Board, etc. should assist the persons with disabilities by providing them high tech/latest technology led assistive devices (including low vision aids, hearing aids with battery), special furniture, wheel chairs (motorized if required by the employee), software scanners, computer and other hardware, etc. in accordance with their requirement, which would improve their efficiency.

They should either provide or shall reimburse the cost of such devices within a specific time period for such devices to persons with disabilities in accordance with the price/durability of the special devices, special furniture, software, scanners, computer and other hardware, etc, as fixed by them, in consultation With various national institutes working in the sphere of disability, a review exercise shall be

carried out by the departments/ministries every three years to check the availability or need for introduction of enhanced/upgraded versions of such devices/software etc. They shall utilize their existing budget provisions for providing these facilities.”

#### **5.4. Suggestions**

- a. Assistive technology forms the core of an enabling work environment for VI employees. This vital area is aptly highlighted in above-mentioned directives. Therefore, we earnestly urge that all banks comply with the statutory directions and MOF should monitor and follow up with the banks for compliance.
- b. Assistive technology (software and devices) are easily available in the Indian market. Banks can easily procure them in bulk at the central level at cheaper rates. This is a one-time investment the fruits of which can be reaped by banks throughout the career of these employees.
- c. Banks should formulate a policy for providing assistive technology to the visually impaired and update it regularly.
- d. Banks should provide periodic training on assistive technology with the active involvement of stake holders/in-built resources/NGOs working in this field so that employees can update their knowledge in respect of latest accessible technology.

## **6. IT Accessibility**

### **6.1. Situation on the ground**

Out of a total of 492 respondents from all banks, 35 (7.11%) say that sites and software used in the banks are not accessible, 274 (55.70%) say that they are partially accessible, while 95 (19.30%) have not used them and just 88 respondents (17.90%) say that they are completely accessible.

Thus, about 62.80% of respondents find banks' software like Core Banking Solution (CBS) and internal sites not accessible with assistive technology. As a result, it is almost impossible for the VI to use those facilities.

Except seven banks namely, BoM, Central Bank of India, Dena Bank, Indian Bank, OBC, SBM, and SBT, the situation is grim as 50% or more of the respondents say sites and software are either inaccessible or only partially accessible.

Annex 1, Sheet 3 contains information gleaned from banks' RTI responses and survey data about accessibility of internal sites and softwares of the banks.

### **6.2. What the banks say**

As far as the accessibility of e-portals in terms of W3C standard, SBH says it has fully complied. SBI, SBBJ, and SBP say their Internet site and CBS are compliant; Allahabad Bank, BOI, Canara Bank, Central Bank of India, IOB, PNB, and Syndicate Bank say only their Internet sites are compliant; Corporation Bank says all sites except CBS are compliant; BOB says Internet and HRMS are compliant; BOM, Indian Bank, OBC, SBT, and Vijaya Bank admit that there is no compliance; Union Bank of India reported partial compliance; SBM says "ref. not clear"; and Andhra Bank, Dena Bank, IDBI, Punjab and Sind Bank, UCO Bank, United Bank of India, did not bother to reply to our RTI query. RBI says that it follows government guidelines.

### **6.3. Government guidelines**

A. The United Nations Convention on the Rights of Persons with Disabilities, (UNCRPD) treaty, to which India is also one of the signatories, mentions accessibility in its preamble at point V as under:

“v) Recognizing the importance of accessibility to the physical, social, economic and cultural environment, to health and education and to information and

communication, in enabling persons with disabilities to fully enjoy all human rights and fundamental freedoms."

Article 9 of UNCRPD on accessibility reads as under:

1. To enable persons with disabilities to live independently and participate fully in all aspects of life, States Parties shall take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas. These measures, which shall include the identification and elimination of obstacles and barriers to accessibility, shall apply to, inter alia:

(b) Information, communications and other services, including electronic services and emergency services.

2. States Parties shall also take appropriate measures to:

(a) Develop, promulgate and monitor the implementation of minimum standards and guidelines for the accessibility of facilities and services open or provided to the public;

(b) Ensure that private entities that offer facilities and services which are open or provided to the public take into account all aspects of accessibility for persons with disabilities;

(f) Promote other appropriate forms of assistance and support to persons with disabilities to ensure their access to information;

(g) Promote access for persons with disabilities to new information and communications technologies and systems, including the Internet;

(h) Promote the design, development, production and distribution of accessible information and communications technologies and systems at an early stage, so that these technologies and systems become accessible at minimum cost.

B. The World Wide Web Consortium (W3C) prescribes Level AA of the Web Content Accessibility Guidelines (W3C) 2.0, which are standard norm for all Web sites/contents/Web pages/e-applications, which is defined keeping in mind the accessibility issues of persons with print impairment.

C. The Government of India's National Informatics Center (NIC) has devised standards in the form of Guidelines for Indian Government Websites (GIGW). These guidelines have become an integral part of the Central Secretariat Manual of Office Procedure (CSMOP), and have also been adopted by the Department of Administrative Reforms and Public Grievances (DARPG). The guidelines provide, *inter alia*, as follows:

“In the case of websites, being considerate to the needs of all citizens, including those with different abilities, such as audio-visual impairments, information & services are rendered in a manner that allows access by all. For example, a government website can make available the text transcript of an audio so that audio-impaired citizens can read it, or the same transcript can be read by assistive technologies like screen readers to help visually challenged citizens to access the information conveniently. All such simple yet significant measures show the government's responsiveness towards the needs of its citizens, and its intent of being inclusive in delivering the benefits of governance to all, without discriminating on the basis of abilities, access to bandwidth, technology etc.”

D. Department of Financial Services, MoF GoI, issued the letter no. F.No.3/13/2014-Welfare dated 18.11.2014 to all PSBs/PSICs/FIs., NABARD, IBA, RBI, PFDR, which in its Para 2D has dealt with most of the challenges faced by disabled bank employees in physical space, however, ironically it remains silent on the issue of e-accessibility of intranet portals and websites. Unless the accessibility of various software, platforms and web sites used in the Bank (CBS software, Internet site, Intranet site, e-mail client, HRMS etc.) are in harmony with assistive technology, an ideal accessible work environment would remain a far-fetched notion. Accessibility means that such programmes and platforms are readable and usable by using screen reading software's. Many a times it is not the case, as accessibility requirements are not taken into account while developing such products.

It is essential that the Web/software/programmes be accessible in order to provide equal access and equal opportunity to people with diverse abilities. Indeed, programmes like Digital India and Accessible India launched by our Hon'ble Prime Minister, GIGW, UNCRPD, the Marrakesh Treaty, W3C, etc., all recognize access to information and communications technologies, including the Web, to persons with disabilities as a basic human right.

This is the high time when DFS should embrace the spirit behind above mentioned programmes/treaties/guidelines/standards and instruct all PSBs to take steps for

enabling banking sector VI employees to enjoy this indispensable right and enhance their knowledge base along with augmentation of productivity.

#### **6.4. Suggestions**

- All banks should be guided by a central procurement policy, specifying in explicit terms, the accessibility parameters to be incorporated, based on the aforesaid guidelines, and accordingly, service providers must be asked invariably to fulfill these from the very beginning of the IT design process. This is also to be taken care of while upgrading these IT products so that the accessibility standards are retained.
- Developers of applications on various platforms like Microsoft, Oracle, etc. are expected to follow the guidelines which also include the topics relating to accessibility.
- Finally, to ensure consistency in ensuring that all the parameters are adhered to, it is proposed to conduct regular accessibility audits with a mechanism to address the findings of the audit within a defined time period.

## **7. Physical Accessibility at Workplace**

### **7.1. Situation on the ground**

#### **7.1.1. Braille displays**

Only 1.9% of respondents reported availability of Braille displays and 2.5% said they are available at some places. In 22 banks, not even a single respondent reported availability of Braille displays at work place.

#### **7.1.2. Audio instructions**

Only 7.3% of all respondents reported availability of audio instructions to facilitate internal accessibility at work place and only 4.2% reported availability at some places. In twelve banks, not even a single respondent reported availability of audio instructions. Not even 15% reported availability of the same in twelve other banks.

#### **7.1.3. Movable and navigable passages**

In sixteen banks, only 25% or fewer respondents reported internal passages to be easily navigable. It is between 25-50% in eight banks. Only in four banks more than 50% respondents reported easily navigable passages. To sum up, not even 50% respondents reported a positive experience in most of the banks in this regard.

#### **7.1.4. Locatable wash rooms**

In five banks, more than 75% of respondents reported easily locatable wash rooms at office; this is between 50 and 75% in 16 banks. In five banks, not even 50% of respondents reported easily locatable wash rooms.

In all about 74.40% respondents reported availability of washrooms that are easy to locate and use in at least at some places in their bank.

Annex 1, Sheet 4 contains information gathered from the survey data about physical accessibility.

### **7.2. Government guidelines**

a. Para 2D of MoF IOM dated November 18, 2014 provides for accessibility and a barrier-free environment at work place.

In addition to the guidelines for modification in all public buildings including government offices to provide easy accessibility and a barrier-free environment for PWDs as per the provisions of the PWD Act, all government offices should take

special steps to provide barrier-free and accessible work stations to PWDs, access from main building entrance to their work stations and access to common utility areas such as toilets, canteens, etc. Lifts/elevators should be made accessible by providing Braille signage and audio outputs. Wherever required, suitable colour contrast may also be made available in buildings, utilities, staircases, etc. for the benefit of low vision employees.

b. UNCRPD article 9 on accessibility states that state parties shall take appropriate measures to:

- Provide equal access to PWDs to physical environment like indoor facilities like work places,
- Develop, promulgate, and monitor the implementation of minimum standards and guidelines for the accessibility of facilities and services open or provided to the public;
- Provide training for stakeholders on accessibility issues facing persons with disabilities;
- Provide signage in Braille and in easy to read and understand forms;
- Provide forms of live assistance and intermediaries, including guides, readers and professional sign language interpreters, to facilitate accessibility to buildings and other facilities open to the public.

c. Ministry of Urban Development vide harmonized guidelines and space standards for persons with disabilities dated March 23, 2016, has laid down norms for built environment accessibility for all government buildings.

### **7.3. suggestions**

Easy navigation and mobility is crucial for the VI to move about independently in the office for not only carrying on their tasks but also for personal needs. Ideally, the buildings need to comply with accessibility standards like Braille markings, audio enabled elevators etc. Also low vision employees should be placed in areas which have sufficient lighting.

In order to make sure that VI are provided accessible physical environment and such provision is continued, accessibility audit can be conducted at periodic intervals by organizations in that field.

All employees in banks need to be sensitized, through training, about the needs of VI employees and the support they need. An exclusive session on disability sensitization should be mandatory as a part of induction training and regular

training programs like gender justice sessions carried out for the benefit of female employees.

## **8. Posting and Transfer**

These are vital areas as the entire work life of an employee is spent being and working at the place assigned by authorities. In case of VI employees, they have to be posted to appropriate places and seats to be productive and be satisfied employees.

### **8.1. Situation on the ground**

#### **8.1.1. First posting at home town**

70.5% of the respondents say they have been given first posting or transfer to their home town, while 15.2% say they have not been given such posting, and 14.3% say they have not applied for it.

25% or more of surveyed employees of six banks namely RBI, Dena Bank, Allahabad Bank, IOB, Vijaya Bank and Indian Bank say they have not been given first posting or transfer to their hometown while less than 10% of another six banks' surveyed employees, namely, BoB, Central Bank of India, IDBI, Punjab and Sind Bank, UCO Bank, and Syndicate Bank said they have not been given such posting. The rest of the banks fall between 10 and 25%.

#### **8.1.2. Exemption from routine transfer**

31.1% say they are exempted from routine transfers, 5.0% say they are exempted sometimes, 11.3% say it is not the case, 12.6% say they are not aware, 38.4% say routine transfers are not applicable to them, and 1.7% say they are always struggling about it. In other words, 18% of our respondents are not clearly exempted from routine transfers.

More than 10% employees of about twenty banks say they are not exempted from routine transfers and 25% or more employees of Allahabad Bank, Indian Bank, IOB, RBI, UCO bank, and Vijaya Bank say so.

#### **8.1.3. Exemption from transfer on promotion**

Similarly, 12.6% say they are exempted from transfer even on promotion, 2.9% say sometimes they are exempted, 9.6% say there is no such exemption in their bank, 12.8% say they are not aware about it, 61.7% say it is not applicable to them, and 0.4% say they are always struggling about it. In other words, about 12.90% respondents opine that there is no clear exemption from transfer on promotion for the VI.

More than 10% employees surveyed of seventeen banks say they are not exempted from transfer on promotion and 25% or more of employees of Dena Bank, RBI UCO Bank, and Vijaya Bank say they are not so exempted.

Annex 1, Sheet 8 contains information gleaned from banks' RTI responses and survey data about posting and transfer.

## **8.2. What the banks say**

### **8.2.1. Routine transfers**

BOB, BOI, Dena Bank, IOB, OBC, SBT, and Vijaya Bank have replied to RTI queries saying that they exempt VI from routine transfer. BOM, Indian Bank, PNB, and SBP say they follow government guidelines in this regard. Corporation Bank accommodates as far as possible the choice of place requested by VI employees. SBH has no policy but gives the place of choice. SBI says VI employees are generally exempted from routine transfers. SBM has no policy but says VI are generally exempted. Union Bank says it is ensured they are kept near the place of original posting. RBI considers transfer cases on sympathetic grounds.

All this is revealed by RTI queries filed with the banks by the members of our association.

The remaining banks have not bothered to reply to RTI queries in this regard.

### **8.2.2. Transfer on promotion**

BOB, IOB, OBC, and SBT say they exempt VI employees from transfers even on promotions. BOI exempts depending on the cadre. BOM, Indian Bank, and SBP say they follow government guidelines. Corporation Bank tries to keep them nearer to their native place. SBH has no policy but tries to transfer them to the place of their choice. SBI says they are generally exempted. SBM has no policy but says they are generally exempted. Union Bank says it is ensured they are kept near the place of their original posting. Vijaya Bank provides no exemption from transfer on promotion to VI employees. RBI considers such cases on sympathetic grounds.

The remaining banks have not bothered to reply to RTI queries in this regard.

### **8.3. Government guidelines**

Para 2H MoF IOM dated November 18, 2014 reads as under:

“H. Preference in transfer/posting

As far as possible, the persons with disabilities may be exempted from the rotational transfer policy/transfer and be allowed to continue in the same job, where they would have achieved the desired performance. Further, preference in place of posting at the time of transfer/promotion may be given to the persons with disability subject to the administrative constraints.

The practice of considering choice of place of posting in case of persons with disabilities may be continued. To the extent feasible, they may be retained in the same job, where their services could be optimally utilized.”

Earlier notification F. NO.302/33/2/87-SCT(B) of Government of India, Ministry of Finance, Deptt. Of Economic Affairs (Banking Division), dated 15.02.1998 also mentions that “subject to the administrative exigencies, the physically handicapped persons employed in public sector banks in all cadres should normally be exempted from the routine periodical transfers. It has been decided that such persons should not normally be transferred even on promotion if a vacancy exists in the same branch/office, town/city. When the transfer of a physically handicapped employee becomes inevitable on promotion to a place other than his original place of appointment due to non-availability of vacancy, it should be ensured that such employees are kept nearest to their original place of posting and in any case are not transferred to far off/remote place.”

Thus, it is clear that there exist clear guidelines about posting employees with disabilities including VI to do the jobs where they can be optimally productive and exempt them from routine transfers and even transfers on promotion and post them as far as possible near their place of convenience.

### **8.4. Suggestions**

Considering the mixed scenario which emerges from our survey of VI bank employees and replies to RTI queries sent by our members, we earnestly suggest all banks to:

- Conduct a multi-factorial job mapping exercise for their VI employees taking into consideration among other things, the list of identified jobs by MSJE, level of accessibility achieved in their bank, assistive technology provided, competence of a particular employee and overall milieu in the banking industry

wherein other similarly situated employees are also included. When conducted, such an exercise would give rich benefits both to the bank and the concerned employees who are posted to an appropriate job and are fully productive. Needless to say, banks would benefit from a satisfied and well utilized VI work force.

- Exempt VI employees from routine transfers as it unduly puts them to grave hardship. Besides, such exemption would facilitate retaining the VI employee in the most productive position he/she has been assigned to.
- Exempt VI employees from transfers on promotion also.
- Frame a uniform, transparent, and well-defined transfer policy for PWD, based on the guidelines of DoPT forwarded by MoF.
- The words “Administrative constraints” or “Administrative exigencies” used in the government guidelines should not be construed arbitrarily and PWD should not be victimized by routine or needless transfers.

## **9. Promotion Policy and Promotion Process to Ensure Equal Opportunity**

### **9.1. Situation on the ground**

#### **9.1.1. Discrimination**

10.2% say there is discrimination in promotion with VI, 3.0% say it is there sometimes, 27.7% say there is no discrimination in promotion, 7.8% say they are not aware and 51.4% say it is not applicable to them. In other words, about 13.2% say there is discrimination at least some of the times.

In fact, around 75% of our survey respondents have joined the banking industry in the last five to eight years so most of them have not yet been eligible for promotion.

More than 10% of the surveyed employees of as many as thirteen banks state that there is discrimination in promotion with VI and 25% or more of Allahabad Bank, Andhra Bank, Punjab and Sind Bank, and Reserve Bank of India feel it is so.

When asked to enumerate the kinds of discrimination they face in promotion, they listed a host of issues like: discrimination (for example, reservation not provided), negative attitude of the board, not included in the promotion process, not given time-bound promotion, qualifying marks not relaxed, humiliating questions in interviews, APR marks reduced deliberately, assigning to a job which VI employees cannot do, and so on.

#### **9.1.2. Scribe and extra time**

59.8% say a scribe is given or permitted to be taken in promotional and other exams, 2.7% say sometimes a scribe is given and sometimes not, 1.7% say not given, 35.7% feel it is not applicable to them. In other words, 4.40% respondents say they are not assured that scribe would be allowed or provided at all the times in an exam. In as many as five banks, namely, Canara Bank, Indian Bank, OBC, PNB, and SBT, 10% or more respondents opine so.

Similarly, 66.9% say they are given extra time for writing the exams, 1.0% say sometimes it is given, 2.7% say it is not given, and 29.5% say is not applicable to them. In other words, 3.70% of our respondents feel they were not always provided extra time in an exam. In two banks, namely, Corporation Bank and IOB, 10% or more respondents opine so.

### **9.1.3. Mandatory operational assignments**

14.9% of the respondents say they are facing the issue of mandatory operational assignment for promotion, 8.1% say sometimes they face such issues, 20.4% say there are no such mandatory conditions, and 56.6% say it is not applicable to them. Thus, 23% feel mandatory operational assignment is a hurdle for promotion eligibility.

10% or more of surveyed employees of 22 banks think operational assignments are mandatory for promotion and 25% or more of fourteen banks, namely, Allahabad Bank, Bank of India, BoB, Central Bank of India, Corporation Bank, Dena Bank, Indian Bank, SBP, SBI, UBI, United Bank of India, PNB, Punjab and Sind Bank, and UCO Bank, opine so.

### **9.1.4. Mandatory rural assignment**

9.8% say they are facing the issue of mandatory rural assignment for promotion, 1.4% say sometimes they face it, 23.5% say it is not a mandatory condition for promotion, and 65.3% say it is not applicable to them. Thus, 11.2% feel that mandatory rural assignment is a hurdle for promotion eligibility.

10% or more employees of four banks, namely, Dena Bank, SBI, UBI, and UCO Bank feel it is a mandatory requirement for promotion.

### **9.1.5. Mandatory branch head assignment**

Similarly, 8.3% say they are facing the issue of mandatory experience as branch or regional head for promotion, 5.7% say sometimes they face it, 24.4% say there are no such issues, and 61.6% say it is not applicable to them. Thus, 14% respondents feel that heading a branch or regional office is a hurdle for promotion eligibility.

10% or more employees surveyed of thirteen banks think it is a mandatory qualification for being promoted, whereas more than 25% in Dena Bank and Union Bank of India feel it is so.

### **9.1.6. Number of promotions**

78.6% of our survey respondents say they have not got any promotion, 16.7% say they have got one, 3.8% say they got two, and only 0.9% say they have got three promotions. Again, as almost 75% of our survey respondents have joined relatively recently, i.e., in the last five to eight years, they have not had an occasion to be promoted.

In as many as eight banks namely, Bank of Maharashtra, IDBI, Punjab and Sind Bank, State Bank of Mysore, State Bank of Patiala, State Bank of Travancore, Syndicate Bank, and United Bank of India, none of the surveyed employees has been promoted. Actually, there are eighteen banks where 75% or more of the employees surveyed have reported receiving no promotion as yet. Only nine banks, viz, Allahabad Bank, Canara Bank, Central Bank of India, Corporation Bank, Dena Bank, Oriental Bank of Commerce, Punjab National Bank, UCO Bank, and Vijaya Bank, the number of surveyed employees who have not gotten any promotion is less than 75%.

Annex 1, Sheet 8 contains information gleaned from banks' RTI responses and the survey data about promotion.

Surely this ground reality about discrimination in promotion is alarming to say the least. If such issues persist in promotion process like not allowing the scribe, not giving extra time, not considering blind employees for promotion and even refusing time bound promotion, the working life of blind bank employees is surely fated to be hellish.

Making operational, rural, or head experience mandatory for promotion militates against equality and reasonableness and mars the chances of VI employees to go ahead in their career.

## **9.2. What the banks say**

BOB, IOB and Union Bank of India say they exempt VI employees from mandatory operational/rural assignments for promotion. BOI says they are exempted if disability is above 65%. Corporation Bank, Dena Bank, SBP, and Vijaya Bank leave it to their CMDs to exempt VI employees from any such requirements. OBC provides exemption in individual cases. PNB, SBH, SBI, SBM, SBT have categorically informed that they provide no such exemption to their VI employees. Syndicate Bank says it follows government guidelines in this matter.

The other banks have not replied to RTI queries in this regard.

The number of promotions VI employees have got in various banks in last ten years follows.

BOB 32, BOM 12, Corporation Bank 24, Dena Bank 11, PNB 47, SBH 14, SBT 4, Union Bank of India 7, and Vijaya Bank 14. Other banks have not replied to RTI queries in this regard.

From RTI replies it is clear that there are no VI employees in Scale III in many banks, like Allahabad Bank, Andhra Bank, BoM, Canara Bank, Corporation Bank, Dena Bank, IDBI, Indian Bank, IOB, Punjab and Sind Bank, SBI, SBBJ, SBT, SBP, Syndicate Bank, UBI, United Bank of India, and Vijaya Bank. (Out of a total of 42378 officers in scale III , only 21 are VI.) In all the banks except BoB, Central Bank of India, PNB, and SBI, in scale IV there is no VI person (out of a total of 19477 officers in scale IV, only ten are VI) and in higher scales there are virtually no VI employees in any of the banks. This is surely evidence of discrimination. There seems to be an unwritten policy followed by all the banks to not promote VI employees beyond certain scales . Some banks have given the list of their VI employees with name and cadre at the time of joining and their current status; it shows that some of the employees continue in the same scale even after 10-20 years of service.

As per MOF guidelines, promotion in the officer cadre is based on three parameters, viz, 1. Annual Performance Appraisal (APA), 2. Written test, and 3. Interview.

Discrimination in APA – Most of the VI employees are not given a rating comparable to their colleagues. Their challenged environment is not taken into account by the appraisers. For example, without providing assistive devices they are expected to perform at par and without job mapping they are compared in productivity to their non-disabled counterparts. Normally VI employees are under-rated.

Discrimination in written test: Most of the study materials are internal, like circulars, memos, manuals, and are also confidential and are in non-accessible format like books, intranet source, etc. Most of the banks are not providing pre-promotion training even after the DOPT/MOF guidelines were issued. There is no relaxation in marks or zone of consideration as extended to SC/ST employees.

Discrimination in interview: Most of the members of the Board are not aware that there are lists of jobs identified in which PWDs can perform and they are not aware about the availability of assistive devices that can be used by the VI to perform their tasks. Some of the members have negative mind set about the disabled.

### **9.3. Government guidelines**

Section 47 (2) of the PWD Act 1995 provides for non-discrimination in promotion. It reads as under:

S47(2) “No promotion shall be denied to a person merely on the ground of his disability:

Provided that the appropriate Government may, having regard to the type of work carried on in any establishment, by notification and subject to such conditions, if any, as may be specified in such notification, exempt any establishment from the provisions of this section.”

The subsection has been interpreted to mean no discrimination can be practiced in the eligibility for promotion and inclusion in the promotion process against PWDs. Actually, the supreme court in UOI v. National Confederation for Development of Disabled on September 12, 2014, and recently on June 30, 2016 in a landmark case of Rajeev kumar Gupta Vs. Union of India and others has laid down that the benefit of reservation should be given to PWDs even in promotion. The SC has laid down that section 33 of PWD Act, 1995, provides for filling up not fewer than three percent vacancies in all establishments by PWDs. This means that reservation of 3% for PWDs has to be there, irrespective of the mode of recruitment, direct recruitment or promotion, once the posts are duly identified as suitable under section 32 of the said Act. This judgment would usher in the much-needed reservation in promotion to class II and class I posts for PWDs. DoPT OM dated December 29, 2005 already provides for such reservation in classes III and IV and specifies that “Three percent of the vacancies in case of promotion to Group D and Group C posts in which the element of direct recruitment, if any, does not exceed 75%, shall be reserved for persons with disabilities of which one per cent each shall be reserved for persons suffering from (i) blindness or low vision, (ii) hearing impairment and (iii) locomotor disability or cerebral palsy in the posts identified for each disability.

It goes on to lay down that

**“18. CONSIDERATION ZONE. INTERSE EXCHANGE AND FORWARD OF RESERVATION IN CASE OF PROMOTION**

- a. While filling up the reserved vacancies by promotion by selection, the disabled candidates who are within the normal zone of consideration shall be considered for promotion. Where adequate number of disabled candidates of the appropriate category of handicap are not available within the normal

zone, the zone of consideration may be extended to five times the number of vacancies and the persons with disabilities falling within the extended zone may be considered. In the event of non availability of candidates even in the extended zone, the reservation can be exchanged so that post can be filled by a person with other category of disability, if possible. If it is not possible to fill up the post by reservation, the post may be filled by a person other than a person with disability and the reservation shall be carried forward for up to three subsequent recruitment years, whereafter it shall lapse.

- b. In posts filled by promotion by non-selection, the eligible candidates with disabilities shall be considered for promotion against the reserved vacancies and in case no eligible candidate of the appropriate category of disability is available, the vacancy can be exchanged with other categories of disabilities identified for it. If it is not possible to fill up the post by reservation even by exchange, the reservation shall be carried forward for up to three subsequent recruitment years where after it shall lapse.”

Thus, it is clear that the guidelines mandate that there shall not be any discrimination in promotion of PWDs including the VI. The MOF has left it to individual banks to determine whether to exempt employees with disabilities from such requirements of rural, operational, or head assignments for eligibility to promotion.

Only a few banks have said they categorically exempt VI employees. Others exercise wide discretion in the matter and decide on a case to case basis.

Practices like not including them in the promotion process, denying time-bound promotions, not providing reasonable accommodation, making operational/rural posting mandatory for promotions, etc., which have come to fore in our survey clearly fall fowl of all these guidelines.

#### **9.4. Suggestions**

In view of all this, VIBEWA strongly calls upon the banks to refrain from any form of discrimination against their VI employees in matters of promotion. They should specifically:

- a. Include all VI employees legitimately in the promotion process.
- b. Provide reasonable accommodation like permitting scribes, extra time while taking the promotional exams and providing the study material in accessible format.

- c. Have a positive attitude towards them in interviews that they are capable of performing the job.
- d. Give all time bound promotions to them.
- e. Reserve three percent vacancies for employees with disabilities including one percent for the VI in promotions also.
- f. Stop implementing the arbitrary policy of making operational/rural posting mandatory for promotion eligibility. All the banks ought to come forth and exempt blind employees from such requirements which put a heavy burden upon them as working conditions in terms of accessibility/assistive technology are far from satisfactory at present and virtually negate their chances of career progression. Jobs and postings other than operational and rural assignments can be given to them, like legal, risk management, recovery, financial analyst post, etc., and promotions effected in them.
- g. Pre-promotion training should be provided to VI employees at par with others, and due relaxation in qualifying marks in written test and interview be also given.

DoPT may issue the appropriate OM in all aspects concerning promotion and MoF may ensure its implementation by the banks.

# **10. Performance Appraisal**

## **10.1. Situation on the ground**

A majority of our respondents feel that disability is not taken into account in PAR, as there is no specific question on it in the performance appraisal. Many of the respondents do not know exactly as it is kept confidential. Some think their rating is negatively affected by their disability. Only a few feel that their disability was duly considered while appraising their performance, like level of accessibility, suitable job role, etc.

## **10.2. Government guidelines**

There are no specific guidelines as to whether the appraising officer is supposed to factor in disability while evaluating the performance. But proper job mapping is mandated by the MoF, as specified in the circular cited earlier.

## **10.3. Suggestions**

Disability is a supervening factor which affects all aspects of life. It results from the interaction between individual sensory and physical differences and the prevailing infrastructure. The level of accessible work environment is not satisfactory at present in our country. So, we strongly suggest that some mechanism for factoring disability in performance appraisal of the employee be carved out taking on board all the stake holders so that the employee is not put to a disadvantage due to his/her disability while being evaluated.

Annual Performance Appraisal (APA) involves fixing KRAs, mid-term appraisal, and APA. KRA should be based on jobs identified and tasks duly mapped for VI employees. Performance is subject to ensuring appropriate “human aid”, “universal design”, “assistive technology”, and accessibility of work environment, including Information and Communications Technology (ICT). This fact should be clearly recorded while fixing KRAs. While awarding marks the appraiser should confirm and record to what extent it is ensured.

# **11. Special Casual Leave**

## **11.1. Situation on the ground**

### **11.1.1. Four days special casual leave for disability related purposes**

Merely twenty of the total respondents, 3.8%, reported provision of special casual leave (SCL). In eighteen banks not even a single respondent reported availability of this leave. 36% of total respondents reported that such a provision is not available in their bank and 39% reported that they were not aware of such a facility. To sum up, 75% of respondents either reported non-availability of the leave or were not aware of it. 19% are yet to apply for this leave so they cannot yet comment on this issue. By and large, this pattern is uniform across all the banks.

### **11.1.2. Ten days casual leave to attend disability related trainings/seminars**

Only 27 of total respondents, 5.1%, reported provision of ten days special casual leave in their banks. In as many as thirteen banks, not even a single respondent reported availability of such leave. In fourteen banks, 25% or more respondents reported that the leave is not available in their banks. In nineteen banks, 25% or more respondents reported that they are not aware of such a leave to avail. To sum up, out of all respondents, 26% reported that special casual leave is not available in their banks and 40% reported that they are not aware of such a leave. The other 27% reported that they have not applied for the leave so they do not know its availability.

Annex 1, Sheet 7 contains information gathered from the survey data about special casual leave.

## **11.2. Government guidelines**

In the MOF guidelines paragraph G pertains to providing special casual leave for PWDs:

“Vide this Department’s OM No. 25on/i/20o8-Estt.(A) dated 19.11.2008, a provision of Special Casual Leave for 4 days in a calendar year has been made for the employees of Central Government with disabilities for specific requirements relating to disabilities of the official. Further, vide this Department's OM No. 28oi6/o2/2007-Estt(A) dated 14.11.2007, there is also a provision of 10 days Special

Casual Leave in a calendar year subject to exigencies of work for the differently abled Central Government employees with disabilities for participating in Conference/Seminars/Trainings/Workshop related to disability and development to be specified by Ministry of Social Justice and Empowerment”.

### **11.3. Suggestions**

The purpose of any scheme is served only when the target group utilizes the facility. It should be a great concern that more than 95% of respondents have not utilized either of the two leaves. Moreover, a significant number of respondents reported lack of awareness about such facility. In various judgments, courts have observed that it is the responsibility of the employer to sensitize the employees about benefits/facilities to deserving employees.

Banks should circulate the availability of special casual leave not just to PWDs alone but also to all staff so that there is no knowledge gap while sanctioning such leave.

Banks should make the process of availing such leave convenient through their HRMS so that it becomes hassle-free for employees to utilize the same.

## **12. Payment of emoluments and special conveyance allowance**

### **12.1. Payment of emoluments**

#### **12.1.1. Situation on the ground**

9.3% of total respondents reported that they were not paid their due emoluments on par with other colleagues. Respondents from as many as seventeen banks reported that they were discriminated against on this issue. 25% of respondents from Bank of Maharashtra, 40% from Dena Bank, 25% from Indian Bank, 43% from OBC, 33% from UCO Bank, 22% from SBH, and 33% from SBT reported discrimination in payment of emoluments.

### **12.2. Special Conveyance Allowance**

#### **12.2.1. Situation on the ground**

In eighteen banks, more than 20% of respondents reported they are not paid conveyance allowance. In six banks, namely, Bank of Maharashtra, IDBI, OBC, SBM, SBP and SBT, more than 50% of respondents reported non-payment of the allowance. In OBC, as high as 83% reported non-payment of the allowance.

Ironically, in as many as eighteen banks, there were respondents who were not even aware of the provision of this allowance. To sum up, out of 28.60% of total respondents who are not paid conveyance allowance, 9.1% were not even aware of the same to represent the issue to the bank management.

Annex 1, Sheet 7 contains information gathered from the survey data about allowances and special conveyance.

#### **12.2.2. Amount of conveyance allowance paid**

75% of the total respondents reported the amount of conveyance allowance paid as Rs. 400 PM and around 20% reported they were not at all paid the same. It is worthwhile to note that in twenty banks there were some respondents who reported being paid Rs. 400 PM and others who were not at all paid the same which shows there is no uniformity even within a bank with respect to payment of allowance.

4.8% of respondents from eight banks, namely Andhra Bank, BOM, BOB, Indian Bank, PNB, Vijaya Bank, SBI, and RBI reported they were paid more than Rs. 400 PM.

### **12.2.3. Actual expenditure reported by respondents**

Out of all respondents, only eleven respondents, or 2.1%, reported that their actual conveyance expenditure is Rs. 400 or less per month. A majority of respondents, 46.55%, reported that they incur between Rs. 2000 and Rs. 5000 per month towards conveyance.

### **12.3. Government guidelines**

PWDs in PSBs and other financial institutions are paid special conveyance allowance as per the direction of the Ministry of Finance. MOF, vide letter No.3/5/2007-SCT (B) dated 18.02.2009 revised the rate of conveyance allowance to 5% of the basic pay subject to a maximum of Rs. 400 PM, irrespective of their scale/grade.

i) Central government employees are paid as per OM No 21(2)/2008-H-II(R) dated 29.8.2008 and 21(2)/2015-EII (B) dated 6.8.2015 issued by Department of Expenditure, MOF.

In terms of this ministry's orders vide OM No. 21(1 )/97-E-HCB) dated 3.10.1997, blind or orthopedically handicapped employees shall "continue to draw this allowance at double the normal rates, which shall, in no case, be less than Rs. 1,000 per month plus the applicable rate of dearness allowance...."

(ii). Employees of Central Public Sector Enterprises (CPSEs):

The OM reads as follows

"Employees of Central Public Sector Enterprises (CPSEs) who are on Central Dearness Allowance (CDA) pattern of pay scales and are physically handicapped (blind or orthopedically handicapped with disability of lower extremities) will also be entitled to receive Transport Allowance at revised rates by the general guidelines issued by Department of Public Enterprises vide OM No.2(54)/08-DPE(WC)-/09 dated 20<sup>th</sup> January, 2009 based on the Department of Expenditure's OM dated 29<sup>th</sup> August, 2008, subject to the conditions indicated in Para (2) thereof.

2. Physically handicapped (blind or orthopedically handicapped with disability of lower extremities) employees of CPSEs following Industrial Dearness Allowance (IDA) pattern of pay scales, can be extended the benefits of Transport Allowance as envisaged in para 2(i) of Department of Expenditure's O.M. dated 29.8.2008 provided it is within the ceiling of 50% of the basic pay prescribed for perks & allowances as indicated in para 10 of DPE O.M. dated 26.11.2008 read

with DPE O.M. dated 1.6.2011. The other conditions mentioned in DPE OM dated 5.9.2003 may also be considered to be included read with Department of Expenditure OM dated 29.8.2008.”

(iii). Recommendations of the seventh pay commission:

The seventh pay commission recommended a minimum special conveyance allowance of Rs 2250 per month to PWDs of central government.

## **12.4. Suggestions**

Banks should make sure that VI employees are paid all emoluments they are eligible to without any discrimination. With regard to special conveyance allowance, public infrastructure and public transport are uncomfortable as well as risky for PWDs to resort to for commutation between office and residence. As a result, PWDs have to necessarily engage private transport which is very costly. The amount of Rs. 400 paid to PWDs in banks is not at all sufficient to meet this requirement. This is well observed by the Chief Commissioner for Persons With Disabilities in Case No.126/1028/10-11, Shri Subhash Chandra, Vs Department of Financial Services, as “This Court feels that Rs.400 p.m. as an additional amount to compensate for the extra money that an employee with disability has to incur is certainly not sufficient and hence cannot be treated as a reasonable amount. The Public Sector Banks, therefore, should consider granting a reasonable amount which can compensate their employees with disabilities at different level for the extra expenses that they are required to incur.” In the same case, vide its written submission dated 25.9.2012, the Department of Financial Services suggested that anyone not satisfied with the existing rates may approach their employer or the DoP&T who is a nodal agency for framing rules and regulations with regard to facilities and concessions to persons with disabilities. So DOPT is requested to consider following suggestions.

The VI Bank employees should be paid a special conveyance allowance of Rs. 20 per km based on the distance between residence and Office.

Otherwise banks may provide accommodation near to the work place or arrange transport facility to VI employees.

Banks should ensure that all of the VI employees - staff as well as officers get the allowance without any hindrance and impediments, like being entitled for petrol allowance is not ground for denying the special conveyance allowance.

## 13. Assistance Under Staff Welfare

### 13.1. Status in banks

Syndicate Bank informed that Rs.12,000 is provided to PWDs. Union Bank of India reimburses the cost of crutches, hearing aid, artificial limbs, etc. up to Rs. 3,000 per year. (Source: Staff Circular No.6162 dated 16.1.2015 <https://airiefvision.wordpress.com/2015/01/27/circular-issued-by-union-bank-of-india-regarding-staff-welfare-measures-to-serving-and-retired-employees.>)

In Canara Bank, Rs. 3,000 per year is provided to VI employees to purchase accessories: Indian Bank provides Rs.1000 per year for purchase of accessories. Source: HRM-147/2010-11 dated 01.12.2010-URL [http://banknewskumar.blogspot.in/p/staff-welfare\\_40.html](http://banknewskumar.blogspot.in/p/staff-welfare_40.html) which reads as follows:

“Reimbursement of expenses to a maximum of Rs.5000/- for purchase of any one of the following accessories viz 1) Caliper Shoes (one side or both sides), 2) Crutches, 3) below knee limb, 4) wheel chair and 5) Tricycle, 6) Hearing Aid is available to the Orthopedically Handicapped Employees once in their entire career. The application prescribed should be accompanied by Doctor’s certificate. Visually impaired employees can claim a reimbursement of Rs.1000 towards cost of accessories.”

### 13.2. Government guidelines

MoF, vide their communication RF.No.14/7/92 –IR (Vol-II) dated 24.2.2012 informed the norms for Staff Welfare Fund as below:

“....maximum ceiling for Staff Welfare Funds as under subject to cap of 3% of net profit:

Category	Maximum ceiling per year
State Bank of India	Rs. 100 crores
PSBs with business mix of over Rs. 300,000 crores and employee strength above 30,000	Rs. 25 crores
PSBs with business mix of Rs. 150,000 to Rs. 300,000 crores and employee strength of 20,000 to 30,000	Rs. 20 crores

Banks have to form a Staff Welfare Committee with executives from HR, Liaison Officer for SC/ST & OBC, and representatives of two unions. They form the scheme and get it approved by the Board. PWDs are provided assistance from the welfare schemes to purchase devices.

### **13.3. Suggestions**

Very useful electronic gadgets are available for the visually impaired. For example, smart cane for mobility, recorder, etc. Therefore banks can consider providing around Rs. 15,000- Rs. 20,000 every three years towards purchase of these devices.

## **14. Preference in Staff Quarters**

### **14.1. Situation on the ground**

Out of the total respondents, 15% reported that they were not given preference in allotment of staff quarters. In thirteen banks, Allahabad Bank, Andhra Bank, BOI, BOB, BOM, Central Bank of India, Dena Bank, IOB, OBC, Punjab and Sind Bank, SBP, UCO Bank, and Vijaya Bank, more than 20% of respondents reported that they were not given preference in allotment of staff quarters.

7.4% of total respondents from fourteen banks reported that they were not aware of such a provision. In six banks, namely, Bank of Maharashtra, Dena Bank, IDBI, SBH, Union Bank of India, and United Bank of India, more than 15% respondents reported that they were not aware of such a provision.

Annex 1, Sheet 7 contains information gathered from the survey data about preference in staff quarters.

### **14.2. Suggestions**

Searching for a home is not an easy task for a blind person. Therefore, banks should make sure blind employees are given preference while allotting staff quarters. Moreover, living with office colleagues would provide some support for VI employees.

## **15. Communication of Government Guidelines**

### **15.1. Situation on the ground**

Out of all respondents, only 38, 7.3%, reported that MOF guidelines were internally circulated in their banks. In twelve banks, not even a single respondent reported circulation of the same.

In sixteen banks, more than 90% respondents reported that either the guidelines were not circulated or they were not aware of such circulation. Out of all respondents, 59.60% reported the guidelines were not internally circulated and 33.10% were not aware of such circulation.

Annex 1, Sheet 7 contains information gathered from the survey data about internal communication of MoF OM.

### **15.2. Government guidelines**

While delivering the judgment in C.M.P.(MD)No.2818 of 2016, The Madurai Bench of the Madras High Court laid down certain responsibilities on the part of the implementing agencies of welfare schemes as follows “15. Persons with Disabilities (Equal Opportunities, Protection of Rights and Full Participation) Act, 1995, is a beneficial enactment. Though some of the judgments, which we now considered, lay down the principles of law, as to how, a beneficial enactment should be construed and interpreted, we are of the view that the same principles can be applied to a Government Order, extending benefits to a differently abled person, as the Government Order is in consonance with the constitutional objective.

### **15.3. Suggestions**

The ultimate objective of any beneficial scheme is achieved only if the benefit reaches the beneficiary without hassles resulting in betterment in quality of life. Dissemination of information and sensitization about the scheme not only to the beneficiaries but to all the persons concerned is paramount for success of any scheme; otherwise they will be confined to a book of instructions to satisfy certain norms. The nodal ministry for the welfare of the PWD should make banks responsible for disseminating information about the schemes, guidelines, OMS and all other information related to rights and welfare of PWDs to all the persons concerned. Banks should issue a master circular containing all the guidelines and schemes pertaining to PWDs every year. In trainings conducted by banks there can be a slot for sensitizing the staff about disability related schemes . The intranet

sites of banks should contain the provisions of the schemes as a ready reference to the staff. Here it is worthwhile to reiterate that the intranet sites of banks are not accessible with the screen reading software used by VI employees. If the particular portal containing the information is not accessible, it is at par with not disseminating the information at all. Therefore, banks should make sure that information is provided in accessible format for VI employees.

## 16. Escort facility

### 16.1. What the banks say

Corporation Bank has informed us about the policy of the bank to provide escort facility either during LTC or on official travel. Corporation Bank vide their HO circular no 125/2000 dated 16.5.2000 informed all its branches and offices as follows:

“Handicapped employees nominated for outstation training programmes may be permitted to take along a companion. Actual traveling expenses incurred in respect of such companion, subject to limits at which the entitlement of the employee concerned will be reimbursed. Wherever accommodation is provided to the trainee such facility shall also be extended to the companion.”

### 16.2. Government guidelines

Regarding permitting escort to handicapped government servants, OM No : 31011/4/91 dated 9 July 1991, issued by DOPT pertains to permitting escorts to handicapped government servants while availing LTC. This facility is only available to a government servant who does not have any family members. A medical certificate has to be produced certifying that the employee is in need of assistance during travel and the head of the department needs to be convinced.

Regarding traveling allowance in respect of attendant/escort for accompanying a government servant with disabilities on travel during tour/training, etc, **Ministry of Finance, Department of Expenditure** by OM No. 19030/3/2013-E.IV dated 17 Feb 2015 issued guidelines. Important points in the above guidelines are as follows.

While for travel by air, airlines are expected to provide assistance to government servant with disabilities during travel as per airlines' policies, a government servant with disabilities however, can take along his personal attendant/escort for travel by Indian Railways for assistance during journey and boarding/de-boarding, even when an attendant/escort at destination station is provided officially.

(c) In all cases, government servant with disabilities are required to purchase travel tickets for self and attendant/escort at concessional rates, if any, offered by Railways/Airlines.

(d) The facility of traveling allowance for the attendant/escort would only be admissible to those government servants with disabilities, wherein it is certified by the competent medical authority that such a person compulsorily requires assistance of another person for travel. Under this clause, necessary certificate is to be obtained from the head of department of a Government Civil Hospital designated for the type/form of disability of the government servant. Based on the certificate from competent medical authority, heads of departments would have to be further satisfied of the need for an attendant/escort during travel of the government servant, before allowing the journey for the attendant/escort.'

### 16.3. Suggestions

VI employees need assistance while traveling to new places as public infrastructure and transport are inconvenient, inaccessible, as well as risky.

As in above OMs issued by DOPT and MOF, Department of Expenditure, all the banks may be directed to permit escort facility to their disabled employees for undertaking travel on duty / LTC. Whenever VI employee travels on official duty, escort facility should invariably be allowed without imposing any onerous pre-conditions like certifying the need medically or non-availability of assistance at destination, etc.

## **17. Grievance redressal mechanism and Liaison Officer**

### **17.1. Situation on the ground**

#### **17.1.1. Liaison officer for PWD**

In all, 82.20% respondents said there is no liaison officer for PWD in their banks or they are not aware of the same.

In twenty banks, 25% or fewer respondents reported availability of liaison officer for PWD. In seven banks, namely, Dena Bank, OBC, Punjab and Sind Bank, SBM, SBBJ, UCO Bank, and United Bank of India, not even a single respondent reported availability of liaison officer for PWDs. In as many as eighteen banks, more than 75% respondents reported that there is no liaison officer for PWDs or they were not aware of the same. In twelve banks, namely, Canara bank, Dena bank, OBC, PNB, Punjab and Sind Bank, SBI, SBM, SBP, SBT, Syndicate Bank, UCO Bank, and United bank of India, more than 90% of respondents reported that there is no liaison officer or they are not aware of the same.

#### **17.1.2. Grievance redressal cell**

Out of all respondents, only a meager 24, 4.6%, reported availability of grievance redressal cell for PWDs in their banks. In fifteen banks, not even a single respondent reported availability of the same. In twenty banks, more than 90% of respondents reported that either such a cell was not available in their bank or they were not aware of the same. Out of all respondents, 58.50% reported that grievance cell was not available and 36.90% were not aware of any such cell.

Annex 1, Sheet 7 contains information gathered from the survey data about liaison officer and grievance redressal cell.

### **17.2. What the banks say**

Fifteen of the banks responded that they have a liaison officer for PWDs, One bank, SBH, reported that it does not have a liaison officer for PWDs. Eleven banks, namely, Andhra Bank, BOI, Canara Bank, Dena Bank, IDBI, OBC, Punjab and Sind Bank, RBI, SBI, UCO Bank, and United Bank of India, have not replied to the question. To sum up, while only one bank admitted not having a liaison officer for PWD, eleven banks did not reply to the question.

### **17.3. Government guidelines**

OM no: No.36D35/3/2013-Estt.(Res) dated 31.3.2014 by DOPT issued to all ministries and departments and which was forwarded to all the banks by the MOF on 18.11.2014, has clear guidelines about the grievance redressal mechanism to be adopted. It says “preferably constitute a Grievance Redressal Mechanism headed by the Head of Administration and comprising at least two employees including a PWD having knowledge in disability matters. The Committee so constituted would receive and try to redress the grievances of persons with disabilities within a reasonable time frame.”

Regarding liaison officer for PWDs, the same OM instructs as follows:

The Liaison Officer appointed to look after reservation matters for SCs, STs may also act as the Liaison Officer for reservation matters relating to persons with disabilities. The Liaison Officer would also look after the issues relating to providing of amenities for the persons with disabilities.

MOF, DOFS, letter No 10/40/2012 dated 19.3.2013 addressed to Chairman IBA informs that the department had been holding annual meetings with the SC/ST, OBC Welfare Associations over and above quarterly meetings being held by the management of the respective institutions at central and zonal levels with these associations. Also, MOF, DOFS, letter No 10/16/2011 welfare SCT (B) dated 22.8.2013 addressed to CEOs all PSBs/FIs/PSICs clarified regarding quarterly meetings with associations of SC/ST employees at National/Zonal/Circle levels.

In the MOF letter there was no mention about the meeting with Welfare Associations of PWDs, though the liaison officer for all are common. . This may be due to the fact that meetings are held under CCS(RSA) Rule 1993, which is prior to PWD Act 1995.

### **17.4. Suggestions**

Presence of liaison officer and grievance redressal mechanism are two important aspects to ensure proper implementation of schemes, guidelines, and OMs issued by various authorities. Therefore, as per MOF guidelines, banks should invariably have in place a liaison officer to ensure recruitment of PWDs as per the reservation system and implementation of other measures for welfare and empowerment of PWDs.

Availability of liaison officer and grievance redressal should be widely circulated within the banks so that PWDs become aware of the same. Enquiries/complaints

received should be taken to the notice of top management and corrective action should be initiated promptly.

Also quarterly meeting should be conducted with welfare associations of VI employees within the banking sector and annual meeting with IBA to monitor the progress.

Similar to the situation with SC/ST employees, a committee can be formed to oversee the implementation of welfare measures for VI employees.

## 18. Annex - 1

The following abbreviations are used in all eight sheets in Annex 1.

BoB	Bank of Baroda
BoI	Bank of India
BoM	Bank of Maharashtra
CBI	Central Bank of India
IOB	Indian Overseas Bank
OBC	Oriental Bank of Commerce
PNB	Punjab National Bank
P&SB	Punjab and Sind Bank
RBI	Reserve Bank of India
SBBJ	State Bank of Bikaner & Jaipur
SBH	State Bank of Hyderabad
SBI	State Bank of India
SBM	State Bank of Mysore
SBP	State Bank of Patiala
SBT	State Bank of Travancore
UBI	Union Bank of India
UtBI	United Bank of India

## 18.1. (Sheet 0) Profile of Respondents

Gender	Number	%
Female	142	25.80
Male	408	74.20
Total	550	100.00

Year of Joining		
Year	Number	%
Up to 1985	11	2.00
1986 to 1995	38	6.90
1996 to 2005	25	4.50
2006 to 2015	476	86.50
Total	550	100.00

Present Posting		
Unit	Number	%
Branch	358	65.10
Training Center / Staff College	10	1.80
Administrative/Processing Office	177	32.20
No response	5	0.90
Total	550	100.00

State Where Posted		
State	Number	%
Andhra Pradesh	83	15.10
Assam	1	0.20
Bihar	1	0.20
Chhattisgarh	1	0.20
Delhi	61	11.10
Gujarat	16	2.90
Haryana	10	1.80
Jharkhand	1	0.20
Karnataka	40	7.30
Kerala	9	1.60
Madhya Pradesh	17	3.10
Maharashtra	101	18.40
Orissa	3	0.50
Puducherry	4	0.70
Punjab	7	1.30
Rajasthan	16	2.90
Tamil Nadu	81	14.70
Telangana	62	11.30
Uttaranchal	8	1.50
Uttar Pradesh	20	3.60
West Bengal	8	1.50
Total	550	100.00

## (Sheet 0) Profile of Respondents (continued)

Extent of visual impairment		
% disability	Number	%
40 to 50%	17	3.10
51 to 60%	4	0.70
61 to 70%	14	2.50
71 to 80%	51	9.30
81 to 90%	26	4.70
91 to 100%	435	79.10
No response	3	0.50
Total	550	100.00

Using computer		
	Number	%
Screen readers	393	71.50
Magnifiers	58	10.50
Screen readers & magnifiers	23	4.20
No assistive software required	13	2.40
Not using computer	53	9.60
No response	10	1.80
Total	550	100.00

Bank in which working		
Bank	Number	%
Allahabad Bank	17	3.10
Andhra Bank	16	2.91
Bank of Baroda	38	6.92
Bank of India	19	3.46
Bank of Maharashtra	5	0.91
Bharatheeya Mahila Bank	0	0.00
Canara Bank	58	10.56
Central Bank of India	12	2.19
Corporation Bank	9	1.64
Dena Bank	5	0.91
IDBI bank	3	0.55
Indian Bank	14	2.55
Indian Overseas Bank	29	5.28
NABARD	0	0.00
Oriental Bank of Commerce	8	1.46
Punjab & Sind Bank	4	0.73
Punjab National Bank	20	3.64
RBI	9	1.64
SEBI	0	0.00
State Bank of Bikaner and Jaipur	6	1.09
State Bank of Hyderabad	55	10.02
State Bank of India	134	24.41
State Bank of Mysore	9	1.64
State Bank of Patiala	12	2.19
State Bank of Travancore	9	1.64
Syndicate Bank	14	2.55
UCO bank	3	0.55
Union Bank of India	21	3.83
United Bank of India	7	1.28
Vijaya Bank	4	0.73
Other banks	5	0.91
Financial institutions	4	0.73
Total	549	100.00

## 18.2. (Sheet 1) Recruitment 01.01.1996 – 31.12.2014

Bank	Total employees	PWD employees		Employees with VI		Employees with HI		Employees with OH		Officers			Clerks			Sub-staff		
		#	%	#	%	#	%	#	%	Total	VI	%	Total	VI	%	Total	VI	%
Allahabad Bank	14756	384	2.60	142	0.96	80	0.54	162	1.10	8275	86	1.04	6207	56	0.90	274	0	0.00
Andhra Bank	12677	208	1.64	62	0.49	22	0.17	124	0.98	6100	25	0.41	4797	36	0.75	1780	1	0.06
BoB	40372	843	2.09	261	0.65	151	0.37	431	1.07	15087	107	0.71	17852	138	0.77	5827	16	0.27
BoI	27005	367	1.36	94	0.35	45	0.17	228	0.84	9876	25	0.25	12802	66	0.52	4327	3	0.07
BoM	7046	87	1.23	5	0.07	7	0.10	75	1.06	4022	2	0.05	2638	2	0.08	386	1	0.26
Canara Bank	35419	737	2.08	157	0.44	162	0.46	418	1.18	15167	74	0.49	12792	74	0.58	7460	9	0.12
CBI	8026	39	0.49	15	0.19		0.00		0.00	7731	13	0.17	281	2	0.71	14	0	0.00
Corporation Bank	16099	310	1.93	66	0.41	42	0.26	202	1.25	4219	26	0.62	9515	32	0.34	2365	8	0.34
Dena Bank	10417	48	0.46		0.00		0.00		0.00	4217		0.00	4941		0.00	1259		0.00
IDBI Bank	18795	300	1.60	15	0.08		0.00	133	0.71	18795	15	0.08						
Indian Bank	9524	166	1.74	50	0.52	17	0.18	99	1.04	3597	21	0.58	5485	29	0.53	442	0	0.00
IOB	22466	348	1.55	95	0.42	107	0.48	146	0.65	10292	41	0.40	8087	45	0.56	4087	9	0.22
NABARD	1321	28	2.12	4	0.30	2	0.15	22	1.67									
OCB	11718	266	2.27	30	0.26	8	0.07	228	1.95	4175	16	0.38	6420	13	0.20	1123	1	0.09
P&SB	6273	82	1.31	19	0.30	7	0.11	56	0.89	3773	11	0.29	2239	8	0.36	261	0	0.00
SBBJ	6045	148	2.45	44	0.73	23	0.38	81	1.34	1722	4	0.23	4084	40	0.98	239	0	0.00
SBH	8540	216	2.53	105	1.23	111	1.30		0.00									
SBM	4413	79	1.79	40	0.91	1	0.02	38	0.86	1137	2.00	0.18	2343	38	1.62	933	0	0.00
SBT	13767	217	1.58	34	0.25	30	0.22	153	1.11	4888	4	0.08	6390	29	0.45	2489	1	0.04
Syndicate Bank	16942	544	3.21	120	0.71	62	0.37	362	2.14	7725	72	0.93	7091	44	0.62	2126	4	0.19
Uco Bank	12532	277	2.21	55	0.44	41	0.33		0.00				4735	26	0.55	1422	0	0.00
UBI	24990	575	2.30	188	0.75	96	0.38	291	1.16	11875	86	0.72	9534	89	0.93	3581	13	0.36
Total	314387	5885	1.87	1459	0.46	934	0.30	3087	0.98	134398	544	0.40	122026	767	0.63	40121	66	0.16

### 18.3. (Sheet 2) Number of Visually Impaired Bank Employees as on 31.03.2015

Bank	VI staff strength in banks												Data on VI Respondents							
	RTI data												SS		Clerk		Officer		Total	
	Sub Staff (SS)			Clerk/SWO			Total Officers			Total			R	%	R	%	R	%	R	%
	Total	VI	%	Total	VI	%	Total	VI	%	Total	VI	%								
Allahabad Bank	2240	3	0.13	7289	40	0.55	12771	81	0.63	22300	124	0.56	0	0	5	12.50	12	14.81	17	13.71
Andhra Bank	4958	2	0.04	4970	36	0.72	10446	32	0.31	19774	70	0.35	0	0	6	16.67	10	31.25	16	22.86
BoB	7886	10	0.13	18568	94	0.51	13686	84	0.61	48097	203	0.42	0	0	12	12.77	26	30.95	38	18.72
BoI	8143	8	0.10	17368	80	0.46	9876	25	0.25	44516	118	0.27	0	0	10	12.50	9	36.00	19	16.10
BoM	2307	5	0.22	5490	12	0.22	6468	3	0.05	14265	20	0.14	0	0	2	16.67	3	100.00	5	25.00
Canara Bank	7460	9	0.12	12792	74	0.58	15167	74	0.49	35417	157	0.44	1	11.1	29	39.19	28	37.84	58	36.94
CBI	8694	10	0.12	14098	66	0.47	16247	31	0.19	39039	107	0.27	0	0	4	6.06	8	25.81	12	11.21
Corporation Bank	2365	8	0.34	9515	32	0.34	4219	26	0.62	16099	66	0.41	0	0	1	3.13	8	30.77	9	13.64
Dena Bank	2337	0	0.00	4930	24	0.49	6365	14	0.22	13632	41	0.30	0		0	0.00	5	35.71	5	12.20
IDBI Bank	970	1	0.10	1135	1	0.09	14563	26	0.18	16668	28	0.17	0	0	0	0.00	3	11.54	3	10.71
Indian Bank	1499	1	0.07	9449	34	0.36	9274	25	0.27	20222	60	0.30	0	0	8	23.53	6	24.00	14	23.33
IOB	2690	7	0.26	12102	51	0.42	16029	54	0.34	30821	112	0.36	2	28.6	11	21.57	16	29.63	29	25.89
OBC	2992	3	0.10	6795	14	0.21	10407	27	0.26	20200	44	0.22	0	0	0	0.00	8	29.63	8	18.18
PNB	15757	7	0.04	27832	117	0.42	24701	56	0.23	68290	180	0.26	0	0	8	6.84	12	21.43	20	11.11
P&SB	658	5	0.76	2113	10	0.47	6409	23	0.36	9180	38	0.41	0	0	0	0.00	4	17.39	4	10.53

18.2. (Sheet 2) Number of Visually Impaired Bank Employees as on 31.03.2015 (continued)

Bank	VI staff strength in banks												Data on VI Respondents							
	RTI data												SS		Clerk		Officer		Total	
	Sub Staff (SS)			Clerk/SWO			Total Officers			Total			R	%	R	%	R	%	R	%
	Total	VI	%	Total	VI	%	Total	VI	%	Total	VI	%								
RBI	4065	4	0.10	3756	20	0.53	7233	23	0.32	15854	47	0.30	0	0	2	10.00	7	30.43	9	19.15
SBBJ	3214	3	0.09	4749	27	0.57	5275	5	0.09	13238	35	0.26	0	0	5	18.52	1	20.00	6	17.14
SBH	3776	4	0.11	6686	51	0.76	6949	15	0.22	17411	70	0.40	0	0	33	64.71	22	146.67	55	78.57
SBI	40511	36	0.09	95713	440	0.46	78602	82	0.10	214836	538	0.25	3	8.33	75	17.05	56	68.29	134	24.91
SBM	1985	0	0.00	4737	13	0.27	3471	6	0.17	10193	19	0.19	0		3	23.08	6	100.00	9	47.37
SBP	3892	2	0.05	5648	37	0.66	5517	0	0.00	15057	39	0.26	0	0	5	13.51	7		12	30.77
SBT	2412	1	0.04	6440	31	0.48	4952	4	0.08	13804	36	0.26	0	0	4	12.90	5	125.00	9	25.00
Syndicate Bank	4055	8	0.20	10553	36	0.34	12838	40	0.31	27446	84	0.31	0	0	5	13.89	9	22.50	14	16.67
UBI													0		7		14		21	
UCO Bank	4104	3	0.07	8853	11	0.12	12279	16	0.13	25236	30	0.12	0	0	0	0.00	3	18.75	3	10.00
UtBI													0		1		6		7	
Vijaya Bank													0		1		3		4	
Total	138970	140	0.10	301581	1351	0.45	313744	772	0.25	771595	2266	0.29	6	4.29	237	17.54	297	38.47	540	23.83

### 18.4. (Sheet 3) Assistive Technology

Bank	number of VI employees	Provision of Assistive Technology (AT)					Updation of AT	Accessibility of internal sites and softwares		# Employees Trained on AT	
		RTI data screen reader	survey data – no screen reader (%)	survey data - no OCR (%)	RTI data magnifier	survey data – no magnifier (%)	Survey data - not done at all (%)	RTI data	Survey data totally or partially inaccessible (%)	RTI data	Survey data - no training (%)
Allahabad Bank	124		70.60	75.10	NO	56.30	31.30	Internet-yes, others no	50.00	NO	100.00
Andhra Bank	70		35.60	61.50		57.10	46.70		87.60		93.80
BoB	203	JAWS-93	35.10	43.70	Nil	34.60	44.40	Internet & HRM-yes	70.30	53	67.60
BoI	118		88.90	75.00		55.60	68.40	Inter net-yes	79.00	No	100.00
BoM	20	JAWS-2	75.00	75.00	Magnifier	25.00	25.00	No	40.00	No	80.00
Canara Bank	157	JAWS-102	26.00	42.30	NO	46.20	16.30	Internet-yes	53.00	mil	96.30
CBI	107	17	25.00	66.60	Window-OS	37.50	27.30	Internet-yes	40.00	Note 1	66.70
Corporation Bank	66	JAWS- 17	66.60	40.00	0	45.50	55.60	All sites-yes except CBS	55.60	Nil	88.90
Dena Bank	41	JAWS-30	40.00	60.00	Nil	40.00	40.00		40.00	NIL	100.00
IDBI Bank	28		66.70	100.00		33.30	33.30		66.70		66.70

Note 1: 20 employees in 2014, 6 in 2015

18.3. (Sheet 3) Assistive Technology (continued)

Bank	number of VI employees	Provision of Assistive Technology (AT)					Updation of AT	Accessibility of internal sites and softwares		# Employees Trained on AT	
		RTI data screen reader	survey data – no screen reader (%)	survey data - no OCR (%)	RTI data magnifier	survey data – no magnifier (%)	Survey data - not done at all (%)	RTI data	Survey data totally or partially inaccessible (%)	RTI data	Survey data - no training (%)
Indian Bank	60	NO	85.70	50.00	NO	27.30	27.30	No	41.60	No	90.90
IOB	112	NO	72.40	67.80	NO	40.00	51.90	Internet-yes	64.30	No	96.40
OBC	44	NVDA- 10	62.50	75.00	NO	37.50	75.00	No	42.90	No	100.00
PNB	180	JAWS-85	40.00	100.00	0	25.00	55.60	Internet-yes	75.00	Note 2	75.00
P&SB	38		75.00	47.40		6.70	25.00		66.60		100.00
RBI	47		22.20	37.50		12.50	37.50		87.50		100.00
SBBJ	35	30	50.00	41.60	0	30.80	66.70	As SBI	66.70	10	100.00
SBH	70	JAWS- 67	40.80	100.00	NO	50.00	74.10	Yes	61.10	No	18.50
SBI	538	453	38.50	45.00	INA	26.40	50.90	Internet & CBS	65.50	Note 3	40.50
SBM	19	JAWS- 18	44.40	42.90	NO	40.00	33.30	Rep not clear	11.10	No	88.90
SBP	39	12	100.00	33.30	0	66.60	30.00	Internet & CBS W3C	77.80	No	91.70
SBT	36		66.60	34.10		26.30	71.40	no	28.60	nil	100.00

Note 2: # trained: 54 (2012-13), 20 (2013-14), 55 (2014-15)

Note 3: Vague reply to all

18.3. (Sheet 3) Assistive Technology (continued)

Bank	number of VI employees	Provision of Assistive Technology (AT)					Updation of AT	Accessibility of internal sites and softwares		# Employees Trained on AT	
		RTI data screen reader	survey data – no screen reader (%)	survey data - no OCR (%)	RTI data magnifier	survey data – no magnifier (%)	Survey data - not done at all (%)	RTI data	Survey data totally or partially inaccessible (%)	RTI data	Survey data - no training (%)
Syndicate Bank	84	NSR	78.50	62.80	In OS itself	3.90	37.50	Internet-yes	62.50	Nil	100.00
UBI		INA	33.30	66.70	NA	45.50	23.80	Partially complied	85.80	2015-45	45.00
UCO Bank	30		66.60	62.50		37.50	0.00		100.00		66.70
UtBI			33.30	22.20		50.00	60.00		80.00	Note 4	100.00
Vijaya Bank		JAWS-3	75.00	66.70	Nil	0.00	0.00	NA	50.00	2015-7	75.00
Total	2266		47.20	50.40		30.70	45.90		62.80		

Note 4: Four-week training to 189 employees

## 18.5. (Sheet 4) Job Mapping

Bank	RTI data	percentage of survey respondents saying ...				
		suitable jobs or tasks not identified formally	not consulted while assigning job role to VI	assigned task not suitable	VI not provided with human assistance at workplace	receiving full support from colleagues
Allahabad Bank	INA	52.90	35.30	11.80	29.40	64.70
Andhra Bank		18.80	43.80	18.80	50.00	31.40
BoB	GOI followed	48.60	22.20	21.60	48.60	64.80
BoI	NO	68.40	21.10	10.50	78.90	52.70
BoM	As per govt. guidelines	20.00	60.00	0.00	60.00	60.00
Canara Bank	No policy	24.10	17.00	11.30	34.00	36.30
CBI	No policy	41.70	16.70	8.30	41.70	41.70
Corporation Bank	Yes & communicated	77.80	55.60	22.20	44.40	44.40
Dena Bank	As per MOSJ&E guidelines	60.00	40.00	20.00	0.00	20.00
IDBI		66.70	0.00	0.00	0.00	33.30
Indian Bank	NO	36.40	54.50	18.20	40.00	74.90
IOB	NO	42.90	48.10	14.80	21.40	50.10
OBC	NO	57.10	28.60	28.60	42.90	57.20
PNB	No policy	50.00	30.00	10.50	40.00	40.00
P&SB		100.00	50.00	33.30	50.00	50.00
RBI		87.50	62.50	14.30	57.10	50.00
SBBJ	No policy	66.70	33.30	16.70	16.70	33.30
SBH	Yes	5.60	42.60	11.10	35.20	63.00
SBI	Yes	4.60	26.90	14.50	18.30	50.10
SBM	Yes. But not communicated to operational units	11.10	22.20	22.20	22.20	33.30
SBP	Will be implemented	33.30	41.70	25.00	41.70	75.00
SBT		33.30	55.60	22.20	25.00	55.50
Syndicate Bank	Yes	7.10	35.70	28.60	21.40	50.00
UBI	GOI guidelines followed	19.00	33.30	9.50	33.30	38.10
UCO Bank		33.30	33.30	0.00	33.30	0.00
UtBI		16.70	50.00	0.00	33.30	66.70
Vijaya Bank	No policy	0.00	0.00	0.00	25.00	50.00
Total		27.70	32.30	15.00	32.70	50.10

## 18.6. (Sheet 5) Training to Visually Impaired Employees

Bank	Pre-recruitment training NOT provided to VI (%)	Induction training to VI		Regular training to VI		Pre-promotion training to VI	
		RTI data	Survey Data: % not provided	RTI data	Survey Data: % not provided	RTI data	Survey Data: % not provided
Allahabad Bank	82.40	INA	47.10	INA	64.70	INA	35.30
Andhra Bank	80.00		12.50		43.80		25.00
BoB	73.00	89	5.40	90	31.40		26.50
BoI	78.90		21.10		42.10		0.00
BoM	80.00	8	60.00	6	50.00	1	60.00
Canara Bank	72.00	108/110	24.10	146	66.00	13	24.50
Corporation Bank	100.00	18	22.20	14	33.30	0	33.30
CBI	58.30	2	25.00	0	25.00	0	50.00
Dena Bank	100.00	NSR	40.00	NA	20.00	NA	20.00
IDBI	100.00		0.00		33.30		33.30
Indian Bank	63.60	All	9.10	25	45.50	0	40.00
IOB	82.10	22	28.60	100	57.10	12	46.40
OBC	71.40	19	14.30	21	42.90	0	28.60
PNB	80.00	113	50.00	166	60.00		55.00
P&SB	50.00		25.00		50.00		25.00
Syndicate Bank	71.40	51	0.00	14	50.00	2	61.50
UCO Bank	66.70		0.00		33.30		33.30
UBI	73.70	87	20.00	132	52.60	0	35.00
UtBI	83.30		66.70		66.70		50.00
Vijaya Bank	25.00	17	25.00	22	50.00	2	50.00
SBI	75.20	All	16.90	all	20.80	INA	40.60
SBH	96.30	67	40.70	0	81.50	ALL	13.00
SBM	77.80	29	22.20	23	33.30	0	33.30
SBP	72.70	INA	33.30	INA	50.00	INA	27.30
SBT	88.90		44.40		33.30		37.50
SBBJ	100.00	27/27	0.00	10	50.00	0	33.30
RBI	87.50		12.50		37.50		25.00

## 18.7. (Sheet 6) Unavailability of Physical Accessibility at Work Place

Bank	Braille displays at workplace (%)	Audio instructions at workplace (%)	Movable/navigable passages (%)	Easy to locate and usable washrooms (%)
Allahabad Bank	0.00	0.00	37.50	76.50
Andhra Bank	12.50	12.60	25.10	93.80
BoB	2.70	18.90	37.80	81.10
BoI	0.00	11.20	31.60	89.50
BoM	0.00	20.00	60.00	60.00
Canara Bank	22.40	14.30	70.00	88.70
CBI	0.00	16.70	41.60	66.70
Corporation Bank	11.10	0.00	33.30	66.70
Dena Bank	20.00	0.00	60.00	60.00
IDBI	0.00	0.00	0.00	33.30
Indian Bank	0.00	20.00	50.00	72.70
IOB	0.00	17.80	44.40	78.50
OBC	28.60	14.30	14.30	71.40
PNB	5.00	15.00	31.60	80.00
P&SB	0.00	0.00	25.00	50.00
RBI	25.00	37.50	62.50	75.00
SBBJ	0.00	0.00	0.00	16.70
SBH	0.00	5.60	11.10	37.10
SBI	0.00	10.80	56.50	85.30
SBM	0.00	11.10	44.40	66.70
SBP	0.00	0.00	25.00	90.90
SBT	0.00	11.10	55.50	66.70
Syndicate Bank	0.00	0.00	57.10	78.50
UBI	5.00	15.80	35.00	50.00
UCO Bank	33.30	66.70	66.60	66.60
UtBI	0.00	0.00	33.30	100.00
Vijaya Bank	0.00	0.00	25.00	75.00
total	4.40	11.50	42.90	74.40

### 18.8. (Sheet 7) Special Casual Leave and Staff Welfare

Bank	Four days SCL related to disability issues not provided	Ten days SCL to attend disability related seminars / trainings not provided	Allowances NOT paid as per eligibility without discrimination	Special conveyance allowance on the ground of disability NOT paid	Liaison officer for PWD	No grievance redressal cell for VI/PWD	No preference in allotment of staff quarters	Guidelines of MoF NOT circulated to employees	
									survey data
Allahabad Bank	29.40	23.50	0.00	47.10	Yes	76.50	100.00	29.40	100.00
Andhra ank	43.80	56.30	6.30	43.80		80.00	81.30	26.70	75.10
BoB	21.60	16.20	8.10	16.20	Yes	51.40	86.20	22.20	94.40
BoI	57.90	26.30	5.30	26.40	Not given	47.40	94.80	36.80	100.00
BoM	40.00	40.00	25.00	75.00	Yes	75.00	75.00	40.00	100.00
Canara Bank	40.40	39.60	7.50	22.30	No reply	93.70	98.00	12.50	88.00
CBI	66.70	66.70	0.00	16.60	Yes	83.40	100.00	25.00	100.00
Corporation Bank	22.20	22.20	0.00	33.30	Yes	44.40	66.70	11.10	77.70
Dena Bank	40.00	40.00	40.00	0.00		100.00	100.00	20.00	80.00
IDBI	33.30	0.00	0.00	66.60		66.60	66.70	0.00	66.60
Indian Bank	27.30	27.30	25.00	41.70	Yes	80.00	100.00	10.00	100.00
IOB	32.10	28.60	0.00	44.40	Yes	81.50	100.00	21.40	88.80
OBC	28.60	14.30	42.90	83.30		100.00	100.00	28.60	71.50
PN	47.40	15.00	5.30	15.80	Yes	89.50	94.70	5.90	84.20
P&SB	25.00	25.00	0.00	33.30		100.00	100.00	25.00	100.00

All numbers are percentages.

18.7. (Sheet 7) Special Casual Leave and Staff Welfare (continued)

Bank	Four days SCL related to disability issues not provided	Ten days SCL to attend disability related seminars / trainings not provided	Allowances NOT paid as per eligibility without discrimination	Special conveyance allowance on the ground of disability NOT paid	Liaison officer for PWD		No grievance redressal cell for VI/PWD	No preference in allotment of staff quarters	Guidelines of MoF NOT circulated to employees
	survey data				RTI data	Survey data: no officer			
RBI	50.00	0.00	0.00	0.00		50.00	100.00	14.30	100.00
SBBJ	16.70	0.00	0.00	0.00	YES	100.00	100.00	0.00	100.00
SBH	70.40	29.60	22.30	27.80	No	68.50	100.00	15.10	96.30
SBI	24.40	22.90	5.30	20.60	No reply	95.40	96.90	4.60	96.10
SBM	44.40	22.20	11.10	55.50	Yes	100.00	88.80	11.10	88.90
SBP	40.00	27.30	8.30	58.30	Yes	91.70	100.00	27.30	100.00
SBT	22.20	22.20	33.30	77.70	Yes	88.90	100.00	0.00	100.00
Syndicate Bank	14.30	14.30	7.10	42.80	Yes	92.80	100.00	7.10	100.00
UBI	23.80	14.30	4.80	23.80	Yes	71.40	90.00	5.00	80.90
UCO Bank	33.30	33.30	33.30	33.30		100.00	100.00	66.70	66.60
UtBI	16.70	33.30	16.70	16.70		100.00	100.00	16.70	100.00
Vijaya Bank	50.00	50.00	0.00	25.00	Yes	75.00	75.00	25.00	100.00
Total	36.20	26.80	9.30	28.60		82.20	95.40		92.70

All numbers are percentages.

### 18.9. (Sheet 8) Transfer and Promotion

Abbreviations used in Annex 1, Sheet 8: Promotions and Transfers

Last column of Sheet 8 shows the percentage of VI employees not promoted in the last ten years.

not clear	Response not clear
GOI	As per GOI
No Exemp	No exemption
Gen Exem	Generally Exempted
No policy	No policy regarding exemption but generally exempted.
IndExem	Exemption in individual cases
CMDexem	Exemption by CMD
Choice	No policy but as far as possible posted to choice of place
Orig	Kept near original posting

Bank	first posting / transfer to home town not given	Exemption from routine transfer		Exemption from transfer on promotion		Faced discrimination in promotion	Promotion and other exams		mandatory for promotion			Number of promotions		
		RTI data	Survey: no exemption	RTI data	Survey: no exemption		Not allowed scribe	Not given extra time	operational assignment		rural posting			branch / regional head experience
									RTI data	Survey: % saying yes.		RTI data	Survey: % not promoted	
Allahabad Bank	29.40	no response	41.20	no response	6.30	25.10	0.00	0.00	no response	29.40	12.60	12.50	INA	71.40
Andhra Bank	18.80		0.00		6.70	33.40	0.00	6.30		20.00	0.00	6.30		84.60
BoB	5.40	yes	19.50	yes	14.30	17.60	5.80	2.80	exempted	31.40	2.90	11.70	Clrk-S1-4, S1-2-21, S2-3-6, S3-4-1	93.30
BoI	21.10	yes	15.80	Cadre specific	10.50	11.80	0.00	0.00	relaxed above 65% disability	38.90	0.00	0.00	INA	76.50
BOM	20.00	GOI	0.00	GOI	20.00	0.00	0.00	0.00	not clear	0.00	0.00	0.00	SS -Clrk - 8, clrk-S1-1, S1-2-1,S2-3-2 above scale 3 nil	100.00
Canara Bank	14.30	not clear	16.00	not clear	12.80	20.80	12.20	2.20	NA	6.40	4.50	6.60	no response	73.30
CBI	8.30	NoResp	16.70	NoResp	0.00	8.30	0.00	9.10	NoResp	41.60	9.10	16.60	INA	63.60
Corporation Bank	22.20	Choice	22.20	Nearer to native place	0.00	11.10	0.00	22.20	exemption by CMD	44.40	0.00	11.10	Clrk-S1-16, S1-2-6,S2-3=2.	62.50

All numbers are percentages.

18.9. (Sheet 8) Transfer and Promotion (continued)

Bank	first posting / transfer to home town not given	Exemption from routine transfer		Exemption from transfer on promotion		Faced discrimination in promotion	Promotion and other exams		mandatory for promotion			Number of promotions		
		RTI data	Survey: no exemption	RTI data	Survey: no exemption		Not allowed	Not given extra time	operational assignment		rural posting	branch / regional head experience	RTI data	Survey: % not promoted
									RTI data	Survey: % saying yes.				
Dena Bank	40.00	exempted	20.00	no response	25.00	20.00	0.00	0.00	By CMD	40.00	20.00	50.00	Clrk-S1-4, S1-2-5, S2-3-2	50.00
IDBI	0.00		0.00		0.00	0.00	0.00	0.00		0.00	0.00	0.00		100.00
Indian Bank	25.00	GOI	25.00	GOI	18.20	9.10	10.00	0.00	not clear	40.00	0.00	20.00	INA	83.30
IOB	28.60	yes	25.00	yrs	10.80	14.20	3.70	10.70	exempted	11.10	7.70	7.40	NA	81.00
OBC	14.30	exempted	0.00	exempted	0.00	14.30	16.70	0.00	IndExem	14.30	0.00	0.00	INA	50.00
PNB	15.00	GOI	10.00	GOI	21.00	10.60	10.00	5.00	no response	30.00	5.00	15.80	SS-clrk-6, clrk-S1-2-8, S1-2-23, S2-3-9, S3-4-3, S4-5-1	35.30
P&SB	0.00		0.00		0.00	25.00	0.00	0.00		33.30	0.00	0.00		100.00
RBI	62.50		57.20		37.50	28.60	0.00	0.00		14.30	0.00	12.50		85.70

All numbers are percentages.

18.9. (Sheet 8) Transfer and Promotion (continued)

Bank	first posting / transfer to home town not given	Exemption from routine transfer		Exemption from transfer on promotion		Faced discrimination in promotion	Promotion and other exams		mandatory for promotion				Number of promotions	
		RTI data	Survey: no exemption	RTI data	Survey: no exemption		Not allowed scribe	Not given extra time	operational assignment		rural posting	branch / regional head experience	RTI data	Survey: % not promoted
									RTI data	Survey: % saying yes.				
SBBJ	16.70	no response	16.70	no response	0.00	0.00	0.00	0.00	no response	0.00	0.00	0.00	INA	83.30
SBH	11.10	Choice	13.00	Choice	11.30	3.70	1.90	5.60	NoExemp	13.00	7.50	18.90	14	83.00
SBI	13.10	Gen Exemp	20.70	Gen Exemp	14.70	17.20	3.90	3.10	NoExemp	28.50	26.60	22.40	NA	76.90
SBM	12.50	No policy	11.10	No policy	0.00	0.00	0.00	0.00	NoExemp	11.10	0.00	11.10	NA	100.00
SBP	16.70	GOI	9.10	GOI	18.20	0.00	9.10	0.00	Relaxation by MD	30.00	0.00	0.00	INA	100.00
SBT	11.10	exempted	22.20	exempted	12.50	0.00	11.10	0.00	NoExemp	11.10	0.00	0.00	Clrk- S1- 3 & S1-2-1	100.00
Syndicate Bank	0.00	no response	7.70	no response	0.00	0.00	0.00	7.10	GOI	14.20	7.70	15.40	NA	100.00
UBI	14.30	Orig	19.10	Orig	21.10	5.00	5.00	0.00	exempted	26.30	15.80	26.30	SS-clrk - 7	76.50
UCO bank	0.00		33.30		33.30	0.00	0.00	0.00		33.30	66.60	0.00		50.00
UtBI	16.70		16.70		16.70	0.00	0.00	0.00		33.40	0.00	0.00		100.00
Vijaya Bank	25.00	yes	25.00	no	25.00	0.00	0.00	0.00	By CMD	0.00	0.00	0.00	SS-clrk -2, clrk-S1-8, S1-2-4	66.70
Total	15.20		18.00		12.90	13.20	4.40	3.70		23.00	11.20	14.00		78.60

All numbers are percentages.

## 19. Annex 2 - References

Following URLs may be useful to locate the sources of various things cited in the report:

1. Visually Impaired Bank Employees Welfare Association, VIBEWA: [www.vibewa.org](http://www.vibewa.org)
2. Persons with Disabilities (Equal opportunities, protection of rights and full participation) act, 1995:  
[http://www.disabilityaffairs.gov.in/upload/uploadfiles/files/PWD\\_Act.pdf](http://www.disabilityaffairs.gov.in/upload/uploadfiles/files/PWD_Act.pdf)
3. List of identified jobs for persons with disabilities including blind and low Vision prepared by ministry of social justice and empowerment:  
<http://www.disabilityaffairs.gov.in/content/page/rules--and-regulations.php>
4. List of jobs being actually done by VI in banks prepared by VIBEWA:  
[http://www.vibewa.org/jobs-handled-by-VI\\_employeesually-impaired-employees-in-banks/](http://www.vibewa.org/jobs-handled-by-VI_employeesually-impaired-employees-in-banks/)
5. United Nations Convention on the Rights of Persons with Disabilities, UNCRPD:  
[www.un.org/disabilities/convention/conventionfull.shtml](http://www.un.org/disabilities/convention/conventionfull.shtml)
6. W3C Web Content Accessibility Guidelines:<https://www.w3.org/TR/WCAG20/>
7. Government of India Guidelines for Web accessibility, GIGW:  
<http://web.guidelines.gov.in/#&panel1-2>
8. A reference for procurement policy, read: <http://cisindia.org/accessibility/blog/accessible-ict-procurement>
9. Microsoft accessibility standards:  
[https://msdn.microsoft.com/enus/library/aa291308\(v=vs.71\).aspx](https://msdn.microsoft.com/enus/library/aa291308(v=vs.71).aspx)
10. Oracle accessibility standards: <http://www.oracle.com/us/corporate/accessibility/index.html>
11. Companies specializing IT accessibility for VI and accessibility audits: [www.barrierbreak.com](http://www.barrierbreak.com),  
<http://www.maxability.co.in/>
12. Global Accessibility awareness day: <http://globalaccessibilityawarenessday.org/>
13. harmonized guidelines and space standards for persons with disabilities dated March 23 2016 issued by Ministry of Urban Development:  
<http://cpwd.gov.in/.../Harmonisedguidelinesreleasedon23rdMarch2016.pdf>
14. VIBEWA, "Jobs Handled By Visually Impaired Employees In Banks",  
<http://www.vibewa.org/jobs-handled-by-visually-impaired-employees-in-banks/>
15. Office Memorandum, "Guidelines for providing certain facilities in respect of persons with disabilities who are already employed in Government for efficient performance of their duties", Department of Personnel and Training, Ministry of Personnel, Public Grievances and Pensions, Government of India, o.36D35/3/<sup>2013</sup>-Estt.(Res), 2014 March 3