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**No. GS/AIGETOA/2017/6 Dated 22.02.2017**

To,

The Director (HR)

Bharat Sanchar Nigam Limited

H. C. Mathur Lane, Janpath

New Delhi – 110001

Sub: - **Proposed HR integration of various streams in BSNL – Reg**.

Ref: - No. 4-41/2016-SEA Dated 29/11/2016

Respected Madam,

On the proposed HR integration of different cadres as per subject captioned above, we would like to submit certain information for your kind perusal, consideration and further action please.

1. The system of Internal Financial Advisor (IFA) is a well thought-out system and is well in place in the Administrative Ministry of BSNL, i.e. DoT, in accordance with OM No. 10 (29)-E-Coord/73 dated 06-10-1975 issued by the Department of Expenditure, Ministry of Finance. The said system is also in operation in other ministries and departments of Government of India. In DoT, all Accounts and Finance personnel transfers, postings and promotions are being done by SEA section only.
2. Around 6000 executives are working at present in Account and Finance Wing of BSNL. Many of them are also discharging their duties as Internal Financial Advisor (IFA) at Circle / SSA Level. As per general principles of prudency, the Financial Advice rendered to Executive Head of the Units ought to be independent, fair and transparent in nature keeping in view the General Financial Rules and economic/financial health of the unit. The present system is part of Internal Check System in the Organization which is designed in such a way that the work of one unit is automatically gets cross checked, verified & controlled by another.
3. To have a sound Accounts & Finance checking and internal monitoring system in BSNL, it becomes critically important that HR functions of IFAs in BSNL are under the direct control of Circle IFAs. The proposed HR integration may have far reaching ill-effects in working efficacy and may also increase overall company expenditure. The IFAs at SSA Level are having dual responsibility of reporting to Administrative Head of the SSA as well as Circle IFA for financial and accounts related matters. There is a sense of apprehension that proposed HR integration may dilute the autonomy, independence and fairness of Account and Finance Wing.
4. It is worthwhile to mention that HR Wing in BSNL is not an independent vertical like in other PSUs. In BSNL, the HR Wing primarily consists of officers from Telecom Engineering Wing. It will be worthwhile to mention here that despite having separate HR Recruitment Rules for recruitment of HR personnel, till date no such recruitment has taken place. Without a separate HR vertical, the HR integration will be like a knife without an edge and the very purpose of this integration will be futile. So, your good office is earnestly requested to carve out HR function of all other wings and make a separate and independent the HR Wing, which may take care of HR functions (i.e. recruitment, training, posting, transfer, evaluation & appraisal, promotion, emoluments, retirement, etc.) of all other wings.

It is strongly felt that proposed HR integration of various cadres will not be as purposeful as thought for. It, therefore, becomes extremely important that administrative/HR functions of Account and Finance Wing are to be dealt with exclusively by the Head of Accounts and Finance wing (i.e. IFA) at Corporate Office, Circle Office and SSA level, so that financial advice at all these platforms remain truly independent of administrative compulsions, which is the primary duty of Account & Finance wing. Hence, it is submitted that before processing any such proposal, a separate HR vertical having officers with experience & specialization in managing Human Resources (HR) should be created.

Therefore, it is once again prayed that the proposed HR integration may kindly be re-looked considering the above enumeration in general & keeping in view the complexity of nature of jobs in Accounts and Finance cadre in particular.

Thanking you in anticipation of kind favour,

Ravi Shil Verma

GS, AIGETOA

Copy to:

1. CMD BSNL for kind information please.
2. PGM (Pers) for kind information and necessary action please.
3. GM (FP) for kind information necessary action please.