Diary No. DNO/26/CCPD/7018 **Dated:** 19/10/2026

In the matter of

Shri Abhay Kumar

(Complainant)

Vs.

The Managing Director & CEO
Union Bank of India
(Respondent)

1. Background of the Case

1.1 The Complainant, the husband and caregiver of a person with disability (90 % Locomotor Disability), stated that he works in the Union Bank of India (the Respondent), posted in the Delhi Zone since 2018, and that he was transferred to the Varanasi Zone vide transfer order dated 07.06.2026. He stated that his wife met with a road accident in January 2018, resulting in a spinal cord injury with complete paralysis of the lower half of her body and loss of bowel and bladder control; that she is bedridden and completely dependent on him for daily activities and medical care, including regular repositioning, personal care and continuous supervision, and that her specialized treatment is continuing in New Delhi.

1.2 The Complainant further stated that his aged mother-in-law, who resides with them, is herself suffering from age-related ailments and is unable to look after his wife, that he has a school-going child dependent on him, and that he is the only person available to provide the essential physical, medical and emotional support required by his wife. He submitted that his transfer to Varanasi would make it practically impossible for him to discharge these responsibilities and would adversely affect his wife's regular medical care.

1.3 The Complainant stated that he had applied for his wife's disability certificate on 20.04.2026, before the transfer order was issued, but that, owing to non-availability of the required specialists and her referral to another hospital, the certificate could be issued only on 09.07.2026, a delay beyond his control. He stated that he submitted representations to the Respondent dated 20.06.2026, 02.07.2026, 10.07.2026 and 21.07.2026 and also met the senior HR authorities on 29.07.2026, but received no relief, and therefore approached this Court.

Diary No. DNO/26/CCPD/7018 **Dated:** 19/10/2026

2. Notice of Admissibility

2.1 A notice dated 01.10.2026 under Sections 75 and 77 of the RPwD Act, 2016, was issued to the Respondent for a hearing on 09.10.2026 to determine the admissibility of the case and find out if this can be resolved without further quasi-judicial intervention of this Court.

3. Respondent's Submission

3.1 The Respondent, vide its reply dated 06.10.2026, submitted that the Complainant had been posted in the Delhi Zone since 27.11.2018 and was transferred to the Varanasi Zone under the longer-tenure clause of its Transfer Policy, which makes officers who have completed seven years in a Zone liable for inter-Zone transfer. It stated that a Longer Tenure Transfer Module was opened on its HR portal from 13.04.2026 to 16.04.2026, through which eligible officers could submit Zone preferences or seek exemption, including on the ground of disability of a dependent family member, and that, as per the Policy, a valid disability certificate/UDID card of the dependent is compulsory for such exemption and no requests are considered after the cut-off date. The Complainant neither submitted preferences nor sought exemption in that window.

3.2 The Respondent further submitted that, after the transfer order, the Appeal on Transfer and Grievance Redressal modules were enabled; the Complainant filed a grievance dated 09.06.2026 stating that his wife is completely paralysed and bedridden, but did not submit a valid disability certificate/UDID card, and the Grievance Redressal Committee, in the absence of supporting documents, did not accede to the request, which was communicated to him on 13.06.2026. The Respondent stated that it had provided adequate and multiple opportunities to seek exemption, that the transfer was effected strictly in accordance with the Transfer Policy, and that no deviation from the Policy was observed.

4. Hearing

4.1 A preliminary hearing was conducted on 09.10.2026. The following parties/representatives were present during the hearing:

Sl.No.	Name of the parties/Representatives	For Complainant/Respondent	Mode of Attendance
1.	Shri Abhay Kumar	Complainant	Online

Diary No. DNO/26/CCPD/7018 **Dated:** 19/10/2026

2.	Shri Saurabh Agrawal, Deputy General Manager (HR), Central Office Mumbai, Union Bank of India	Respondent	Online

5. Record of Proceedings

5.1 The Complainant reiterated the submissions made in his complaint, stating that his wife is bedridden and wholly dependent on him, that he is her only caregiver, and that the disability certificate was issued late despite his having applied for it before the transfer order. The Respondent reiterated its written reply, adding that the Complainant had not sought exemption in the window of 13.04.2026 to 16.04.2026, that the disability certificate was dated 09.07.2026, and that no certificate had accompanied his grievance.

5.2 The Court noted that the disability certificate of the Complainant's wife, showing 90% permanent locomotor disability, was issued on 09.07.2026, after the transfer order and after the exemption window, and that the Complainant had not entered the dependent's disability status in his service record. The Court observed that benefits and entitlements have to be based on documents and cannot be granted on verbal submissions alone, and that the Respondent had acted in accordance with its Transfer Policy, with no violation or discrimination on its part. At the same time, the Court took note of the genuine and serious circumstances of the Complainant's family, now supported by documents, and requested the Respondent to look into the matter on humanitarian grounds.

6. Observations & Recommendations

6.1 The Respondent is recommended to ensure that transfers of persons with disabilities are not effected merely citing administrative exigency, without due consideration of the rights, reasonable accommodation requirements and the principles of non-discrimination enshrined in the Rights of Persons with Disabilities Act, 2016.

6.2 The Court notes that the transfer was effected under the Transfer Policy and that the disability certificate was obtained after the prescribed window. However, considering the documented 90% permanent disability of the Complainant's wife, her complete dependence on him, and the late issuance of the certificate for reasons stated to be beyond his control, the Respondent is recommended, on humanitarian grounds and by way of reasonable accommodation, to consider retaining the Complainant at Delhi or posting him at a place within the same city, in a manner that maintains the credibility and

transparency of its Transfer Policy, and to do so at the earliest.

6.3 The Respondent is further recommended to record the disability status of the Complainant's wife and his status as her caregiver in his service record, and to extend to him the entitlements available to caregivers of persons with disabilities as per the applicable guidelines, with effect from the date of the disability certificate.

6.4 In exercise of the functions of this Court under Section 75(1)(b) of the RPwD Act, 2016, the Respondent is recommended to take necessary action on the above recommendations and to inform this Court of the Action Taken Report (ATR) within three months from the date of receipt of this Order, as provided under Section 76 of the Act.

6.5 With the above recommendations, the case is disposed of.

Yours faithfully,

(S. Govindaraj)
Commissioner