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* **IN THE HIGH COURT OF DELHI AT NEW DELHI**

\+ W.P.(C) 235/2026 & CM APPL. 1103/2026

ANANT KUMAR DAHIYA .....Petitioner

Through: Mr. Mukesh Anand, Advocate.

versus

STATE BANK OF INDIA & ORS. .....Respondents

Through: Mr. Siddharth Sangal, Ms. Richa Mishra, Advocates for SBI.

CORAM:
HON'BLE MR. JUSTICE SANJEEV NARULA

O R D E R

% **08.01.2026**

1. The Petitioner seeks multiple directions against Respondent No. 1, State Bank of India[1], including for grant of promotion, payment of travel allowances and "fixture bills", correction of attendance in the Human Resource Management System[2] portal, and restraint on what are described as "unnecessary" transfers.

2. The Petitioner asserts that he is a person with 100% visual impairment and has been working as Deputy Manager since 2017. The core case set up is one of workplace prejudice and denial of benefits, asserted to manifest through repeated transfers, non-promotion, and difficulties in accessing HRMS on account of alleged incompatibility with screen-reading software.

3. It is his further case that during the Covid-19 period, he, along with

[1] "SBI"
[2] "HRMS Portal"

other disabled staff, was directed to work from home in terms of a circular dated 30th April, 2021, which exempted blind and visually impaired employees from attending offices and branches until 31st May, 2021 or until further orders, and which, according to him, was extended from time to time. He asserts that he duly performed the work assigned to him during this period; however, upon resumption of physical duties, he was informed that he had been reflected as short of attendance on the basis of biometric records.

4. The Petitioner attributes the aforesaid deficiency in attendance to the alleged incompatibility of the HMRS with screen-reading accessibility software, which, according to him, hindered independent navigation of the system. He further alleges that the inaccessibility of the HRMS portal also prevented him from independently submitting travel and tour claims and other bills, resulting in non-payment.

5. On the above basis, the Petitioner alleges that the adverse service consequences, including denial of reimbursement, transfers, and non-promotion, are discriminatory and violative of the Rights of Persons with Disabilities Act, 2016,[3] as well as the internal policies of the Respondent Bank intended to ensure inclusion and equal opportunity.

6. The Petitioner states that he raised grievances on the Sanjivani portal, addressed emails to senior functionaries and served a legal notice dated 5th October, 2024. A reply dated 24th October, 2024 was issued disputing his allegations. It is in this backdrop that the present petition has been filed.

7. The Court has considered the material placed on record. A writ court does not function as a forum for roving fact-finding in service disputes,

particularly where the reliefs sought require adjudication of contested factual questions such as what work was performed on particular dates, what communications were exchanged with reporting authorities, what bills were submitted, and how internal systems were accessed. Judicial review in such matters is confined to demonstrable illegality, arbitrariness, *mala fides*, or breach of a statutory mandate. Where the dispute turns on unproved assertions and counter-assertions, the writ remedy is not proper.

8. As regards attendance during the work-from-home period, the Petitioner relies on the circular dated 30th April, 2021. This circular, while exempting certain categories of employees from physical attendance, expressly preserved the obligation to perform assigned duties under a monitored "work from home" arrangement. The relevant stipulation reads as follows:

> *"III. The employees exempted from attending Office/Branch duty in all the stated categories only on genuine health grounds by the concerned authority to being assigned "Work from Home" duties and their output to be closely monitored by the Department/Branch Head, as hitherto."*

9. The exemption, therefore, was from physical reporting, not from accountability of output. The Bank's stand is that biometric attendance norms applied uniformly, and that the Petitioner was treated as absent because he did not respond to calls from the Branch Manager and did not demonstrate the output said to have been delivered during the relevant period. At the hearing, the Petitioner has not been able to point to contemporaneous material showing that work allocated under the work-from-home arrangement was submitted to, acknowledged by, or assessed by

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[3] "2016 Act"

the competent authority in the manner contemplated by the circular. In the absence of such material, a writ direction to rewrite attendance records cannot be issued on assertion alone.

10. The Petitioner asserts that HRMS is not compatible with screen-reading software and that he could not independently submit claims. The Bank, on the other hand, states that there were no travel or tour bills pending approval on HRMS and that no claims were submitted by the Petitioner for reimbursement. The record before the Court reveals that the Petitioner has not produced any documentary trail to show submission of claims, whether on HRMS or through any alternative channel, nor any rejection or refusal by the Bank. A writ court cannot proceed on presumption that claims existed and were withheld, particularly when the relief sought entails financial directions.

11. At the same time, the legal position is clear that a public employer is required to ensure non-discrimination in employment and provide reasonable accommodation to an employee with disability, unless doing so imposes a disproportionate burden. If the Petitioner asserts that HRMS is inaccessible, the minimum factual foundation expected is that the issue was raised with the competent authority with particulars, and that a workable alternative was sought and declined. That foundation is absent in the present record. A mandamus cannot be issued in the abstract, disconnected from demonstrated refusal.

12. The grievance and allegations relating to transfers is also without any cogent basis. Transfer is ordinarily an incidence of service and courts do not interfere unless the transfer is shown to be *mala fide*, punitive in substance, or in violation of a statutory or binding policy. The 2016 Act does not confer

an immunity from administrative transfers. What it does require is that disability cannot be the basis for hostile treatment and that reasonable accommodation must be extended so that the employee can perform functions effectively. In the present case, apart from broad assertions of "unnecessary" transfers, no specific material has been produced to show that any transfer order was actuated by bias, was punitive, or was designed to defeat statutory protections. In such circumstances, interference under Article 226 is not warranted.

13. Likewise, denial of promotions lacks foundation. There is no vested right to promotion. What is enforceable is a right to be considered in accordance with applicable rules and without discrimination. The Bank states that the Petitioner did not qualify in the merit list for the promotion year 2023-24 and was therefore not recommended. The Petitioner has not placed material to show that the promotion process was vitiated by disability-based discrimination, denial of reasonable accommodation at the assessment stage, or deviation from governing norms. Absent such pleadings and proof, the petition cannot be converted into a collateral appeal over selection outcomes.

14. The Petitioner has made allegations of discrimination against officers of the Bank. Those allegations have been denied. In writ jurisdiction, such accusations cannot be adjudicated without particulars, contemporaneous complaints, and a record capable of being tested. No such supporting material is placed. The Court therefore expresses no opinion on these allegations.

15. Seen as a whole, the petition seeks directions which would require the Court to supervise day-to-day service administration, reassess attendance

and output, and issue consequential financial and promotional directions on a disputed factual canvas. That is not the function of judicial review. The petition, therefore, fails to make out a case for interference.

16. The writ petition is dismissed. Pending application(s), if any, also stand disposed of.

17. It is clarified that, if the Petitioner has any specific and admissible claims towards reimbursement of travel or tour expenses, it shall be open to him to submit the same, with supporting documents, to the designated authority of the Bank.

SANJEEV NARULA, J

JANUARY 8, 2026/ab