

# Recovery Compliance 2026

Effective 1 October 2026

The RBI recovery-conduct rules taking effect 1 October 2026 — what every collection & recovery agency must follow, and how **SmartPRS already delivers it.**



## About this manual

**Purpose.** A readiness manual for collection & recovery agencies and for anyone evaluating SmartPRS. For every payroll, HR and workforce-compliance obligation — anchored to the RBI recovery-conduct rules proposed to take effect on 1 October 2026 — it shows why it matters, what is required, how to comply, and the SmartPRS feature that already delivers it. Every feature status in this manual was verified against the live SmartPRS source code (controllers, screens, database tables and scheduled jobs), with proof pointing to where it lives in the product.

**Why 1 October 2026 matters.** RBI's revised draft directions on the conduct of recovery push obligations down onto the outsourced recovery agency — certified agents, verified staff, lawful conduct, call records, grievance handling — and the ability to prove all of it in a vendor audit. That makes a compliant Payroll + HRMS the operational backbone of every recovery agency.

**Status note.** As of 30 June 2026 the 1 October 2026 directions are a draft, not yet final law. Many obligations here are already binding under existing RBI circulars, labour law, the EPF/ESI/PT/Income-tax Acts and the DPDP Act, 2023 — tagged accordingly. Not legal advice.

### How to read each point

Why — the rule and the risk · What — the requirement · How — how to comply · SmartPRS — the built feature (with a status badge) · Proof — where it lives in the product.

**BUILT** live & working today    **PARTIAL** foundation built, enhancement underway    **ROADMAP** planned for the 1 Oct 2026 window

## A. Workforce onboarding & engagement

Lawful, documented engagement is the foundation an auditor checks first.

TOPIC	A1 — Appointment letter / employment order
Why	Proves a real, lawful employment relationship and is the legal basis for any deduction. <b>[LABOUR]</b> (Code on Wages)
What	Every agent receives a written appointment letter stating role, wages, deductions and statutory details.
How	Generate from a controlled template, e-sign, and retain in the employee file.
SmartPRS	<b>[PARTIAL]</b> HR Letters suite generates offer / increment / warning / relieving / NDA letters via template merge, with e-sign for offer & NDA; a dedicated appointment-letter type and a versioned document vault are pending.
Proof	<i>LetterController (merge + DomPDF); letters + letter templates; documents master (kind / status / expiry).</i>

TOPIC	A2 — Code of Conduct + acknowledgement
Why	RBI requires a recovery code of conduct and an undertaking that agents will abide by it. <b>[RBI-NOW / DRAFT]</b>
What	Each agent reads and acknowledges the recovery Code of Conduct.
How	Publish the CoC and capture a per-agent, timestamped acknowledgement.
SmartPRS	<b>[BUILT]</b> Code of Conduct module with per-agent, timestamped acknowledgement; collections CoC pre-seeded.
Proof	<i>code_of_conduct_ack; Knowledge Base content pack.</i>

TOPIC	A3 — NDA / confidentiality undertaking
Why	Borrower-data confidentiality (RBI outsourcing) and the DPDP processor duty. <b>[RBI-NOW / DPDP]</b>
What	A signed confidentiality undertaking is held for every agent.
How	Issue an NDA, capture the signature, surface the status in the audit pack.
SmartPRS	<b>[BUILT]</b> Dedicated NDA letter type with a public e-sign flow; the signed status feeds Compliance.
Proof	<i>letters (letter_type=nda); NDA e-sign page; status on the agent record.</i>

TOPIC	A4 — ID card + field authorisation letter
Why	Agents must carry an identity card and an authorisation letter naming the bank/portfolio and grievance officer. <b>[RBI-NOW / DRAFT]</b>
What	Issue ID cards and per-case / portfolio authorisation letters.
How	Generate ID cards and authorisation letters linked to bank + portfolio; collect on exit.
SmartPRS	<b>[BUILT]</b> ID-card PDF generator; Agent Authorizations record bank, portfolio, authorisation number and validity.

<b>Proof</b>	<i>ID-card generator; agent_authorizations (bank, portfolio, auth_no, valid_to).</i>
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TOPIC	A5 — Unique agent master record
<b>Why</b>	Every compliance artefact (certificate, BGV, payroll, audit) must hang off one identity.
<b>What</b>	One canonical record per agent with a unique employee code.
<b>How</b>	Maintain a single employee master as the source of all compliance flags.
<b>SmartPRS</b>	<b>[BUILT]</b> Employee master with a unique code; on-roll and off-roll / vendor agents both supported.
<b>Proof</b>	<i>employees, offroll_agents; unique emp_code.</i>

## B. DRA / IIBF certification

The recovery-specific qualification — an uncertified agent on a bank portfolio is a breach.

TOPIC	B1 — DRA certificate tracking
Why	RBI requires IIBF-certified recovery agents (100 hrs UG / 50 hrs graduate); the 1 Oct 2026 draft makes it mandatory with a 1-year grace. <b>[RBI-NOW / DRAFT]</b>
What	Hold each agent's certificate number, institute, training track and issue date.
How	Capture certification details + a copy; verify on the IIBF portal.
SmartPRS	<b>[BUILT]</b> DRA Certifications screen: certificate number, institute, training track (100h / 50h), issue and expiry.
Proof	<i>dra_certs (cert_no, institute, track, issue_date, expiry, status).</i>

TOPIC	B2 — Certification eligibility gate
Why	Allocating an uncertified agent to a bank portfolio is an RE breach. <b>[RBI-NOW / DRAFT]</b>
What	Block or warn when an uncertified agent is assigned to a portfolio that requires DRA.
How	Check certification at allocation; hard-block or warn-with-audit (configurable).
SmartPRS	<b>[PARTIAL]</b> Allocating an agent to a bank / portfolio without a valid DRA raises a warning and records an override ( <i>dra_override</i> ) in the audit log; a hard block at allocation is the SmartDCM-bridge step.
Proof	<i>MasterController draGateWarning(); activity_logs (dra_override).</i>

TOPIC	B3 — Expiry / revalidation alerts
Why	Certification validity must be maintained over time. <b>[RBI-DRAFT]</b>
What	Track validity and remind before expiry.
How	Configurable expiry window with auto-alerts and escalation.
SmartPRS	<b>[BUILT]</b> DRA / PCC expiry radar with a configurable window; a scheduled daily scan (compliance:scan at 07:30) queues per-tenant email alert digests.
Proof	<i>ComplianceController scan() / notify(); ScanCompliance command (routes/console.php dailyAt 07:30).</i>

TOPIC	B4 — Training records (collections)
Why	Demonstrable training on recovery conduct. <b>[RBI-NOW]</b>
What	Maintain training completion and content.
How	Track per-agent training; keep the RBI / IIBF / CoC content library.
SmartPRS	<b>[BUILT]</b> Learning & Knowledge module: training programs / records + MCQ tests with auto-scoring; collections content pack.
Proof	<i>training_programs, training_records, tests.</i>



## C. Background & police verification (BGV / PCC)

Antecedent verification of agents is a binding RBI due-diligence duty.

TOPIC	C1 — Antecedent / background verification
Why	RBI mandates antecedent verification of recovery agents; the draft adds an ongoing obligation. <b>[RBI-NOW / DRAFT]</b>
What	Verify identity, address, education, employment, criminal record and references.
How	Run a structured BGV with a documented result per check.
SmartPRS	<b>[BUILT]</b> Structured BGV checklist (identity / address / education / employment / criminal / references) with a documented result per check + report storage.
Proof	<i>bgv (per-check fields, verified_on, report); document vault.</i>

TOPIC	C2 — Police verification (PCC)
Why	Recommended as abundant caution and frequently an empanelment condition. <b>[RBI-NOW]</b>
What	Capture police-verification status and document.
How	Record PCC status, document and validity dates.
SmartPRS	<b>[BUILT]</b> PCC status, expiry and deadline are first-class fields on the agent record.
Proof	<i>employee pcc_status, pcc_expiry, pcc_deadline.</i>

TOPIC	C3 — Re-verification scheduler
Why	Periodicity is bank-policy driven; the draft expects ongoing checks. <b>[RBI-DRAFT]</b>
What	Re-verify at a defined periodicity (e.g., 1–2 years).
How	Configurable periodicity with auto-reminders and overdue flags.
SmartPRS	<b>[BUILT]</b> Re-verification scheduler: the verification date + periodicity (months) auto-computes the next-due date.
Proof	<i>bgv revalidate_months -&gt; next_due.</i>

## D. Statutory payroll — compute AND prove

An auditor wants the challan and the register, not the formula. SmartPRS computes correctly today; the filing-artefact exports are the active build focus.

TOPIC	D1 — Minimum-wage compliance
Why	Statutory right; sub-minimum or cash staffing fails a labour and a vendor audit. <b>[LABOUR]</b>
What	Pay at or above the notified minimum wage for the state / zone / category.
How	Validate each salary against the live notified rate.
SmartPRS	<b>[PARTIAL]</b> Minimum-wage master + check report are live; an auto-flag on every payslip is the next step.
Proof	<i>min_wages; Reports -&gt; Minimum-wage check.</i>

TOPIC	D2 — Wage-payment timeline + payslips
Why	Pay by the 7th; itemised wage slip each period. <b>[LABOUR]</b>
What	Timely payment and a payslip showing earnings and deductions.
How	Track the pay date vs deadline; issue a payslip every cycle.
SmartPRS	<b>[BUILT]</b> Itemised payslips on configurable pay cycles.
Proof	<i>payslips; pay cycles.</i>

TOPIC	D3 — EPF (Provident Fund)
Why	Mandatory at 20+ employees; 12% + 12% (8.33% EPS). <b>[STATUTORY]</b>
What	UAN per member; monthly ECR; TRRN / challan proof.
How	Compute contributions, file the ECR, retain the challan.
SmartPRS	<b>[BUILT]</b> EPF corrected: 12% on Basic+DA capped at Rs.15,000; employer EPS / EPF / EDLI split.
Proof	<i>AppDataController statutory(); PF lines on the payslip.</i>

TOPIC	D4 — ESI
Why	Mandatory at 10+ employees, gross ≤ ₹21k; 0.75% + 3.25%. <b>[STATUTORY]</b>
What	IP number; contribution challan; half-yearly return.
How	Compute, file the challan / return, retain proof.
SmartPRS	<b>[BUILT]</b> ESI corrected: employee 0.75% + employer 3.25% on gross up to Rs.21,000, rounded up.
Proof	<i>AppDataController statutory(); ESI lines on the payslip.</i>

TOPIC	D5 — Professional Tax
Why	State slabs; monthly remittance. <b>[STATUTORY]</b>
What	PT deduction + challan / remittance proof.

<b>How</b>	Apply state slabs; produce the challan.
<b>SmartPRS</b>	<b>[BUILT]</b> Professional Tax on a slab basis (Telangana), toggled in Statutory Rate Settings.
<b>Proof</b>	<i>AppDataController ptForGross(); Statutory Rate Settings.</i>

<b>TOPIC</b>	<b>D6 — TDS on salary</b>
<b>Why</b>	Income-tax §192; quarterly 24Q + annual Form 16. <b>[STATUTORY]</b>
<b>What</b>	Deduct TDS; file 24Q; issue Form 16.
<b>How</b>	Compute TDS, export 24Q, generate Form 16.
<b>SmartPRS</b>	<b>[PARTIAL]</b> Salary TDS is computed (Sec 192 new regime, 87A rebate, marginal relief, cess) and a Form 24Q PDF + quarterly return register exist; Form 16 and live filing status are still to come.
<b>Proof</b>	<i>AppDataController salaryTdsMonthly(); statutoryPdf('tds') 24Q; tdsReturnsHistory().</i>

<b>TOPIC</b>	<b>D7 — Statutory registers (Forms A–E)</b>
<b>Why</b>	Inspectors and vendor auditors demand them. <b>[LABOUR]</b>
<b>What</b>	Wage, muster, leave, overtime and fine / deduction registers.
<b>How</b>	Generate Form B (wage) and Form D (muster) + leave / OT / fine registers.
<b>SmartPRS</b>	<b>[BUILT]</b> Wage, muster and deduction registers (Forms B / D / E) + overtime register as one-click exports.
<b>Proof</b>	<i>Reports -&gt; wage / muster / deduction / overtime registers.</i>

<b>TOPIC</b>	<b>D8 — Bank transfer / no-cash payout</b>
<b>Why</b>	Cash-paid recovery staff are a bank-audit red flag. <b>[LABOUR / audit]</b>
<b>What</b>	Pay via bank and produce a payment advice.
<b>How</b>	Enforce bank-only payout; generate a NEFT / RTGS advice file.
<b>SmartPRS</b>	<b>[BUILT]</b> Bank-advice / NEFT export for no-cash payout.
<b>Proof</b>	<i>Reports -&gt; Bank advice (D8).</i>

<b>TOPIC</b>	<b>D9 — Full &amp; final settlement</b>
<b>Why</b>	Now due within 2 working days of exit. <b>[LABOUR]</b> (Code on Wages §17(2))
<b>What</b>	Auto-settle all final dues on exit.
<b>How</b>	Compute final salary + gratuity + leave – advances / dues; track the deadline.
<b>SmartPRS</b>	<b>[BUILT]</b> Full & final settlement statement on exit.
<b>Proof</b>	<i>Reports -&gt; Full &amp; final settlement; Exit &amp; FnF.</i>

<b>TOPIC</b>	<b>D10 — Gratuity / leave encashment</b>
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<b>Why</b>	Statutory terminal benefits. <b>[LABOUR]</b>
<b>What</b>	Compute gratuity and leave encashment.
<b>How</b>	Built into payroll and the FnF flow.
<b>SmartPRS</b>	<b>[BUILT]</b> Gratuity calculator $((15/26) \times \text{basic} \times \text{years}$ , 5-year eligibility); leave encashment is captured as a request type (a day-balance x rate calculator is the next step).
<b>Proof</b>	<i>StatutoryController gratuity; Gratuity screen; bonus-enc request (Leave Encashment).</i>

## E. Attendance & workforce records

Attendance is both wage-proof and field-visit evidence — a strong SmartPRS area.

TOPIC	E1 — Attendance / muster (biometric + GPS)
Why	Wage proof and field-visit evidence. <b>[LABOUR / RBI field]</b>
What	A reliable attendance source feeding payroll and the muster.
How	Biometric / GPS attendance → muster register → payroll.
SmartPRS	<b>[BUILT]</b> Attendance via biometric integration + in-app GPS punch, consolidated into the attendance register.
Proof	<i>attendance_logs; biometric connector; GPS punch.</i>

TOPIC	E2 — Leave register & holidays
Why	Statutory leave records. <b>[LABOUR]</b>
What	Maintain leave balances and a holiday calendar.
How	Apply / approve leave; track balances; publish holidays.
SmartPRS	<b>[BUILT]</b> Leave types, applications and a holiday master with a leave register.
Proof	<i>leaves, leave_types, holidays.</i>

TOPIC	E3 — Overtime register
Why	OT wage records. <b>[LABOUR]</b>
What	Capture OT hours and wages.
How	Record OT and compute in payroll.
SmartPRS	<b>[BUILT]</b> Overtime register; the amount auto-computes from CTC; export from Reports.
Proof	<i>overtime; Reports -&gt; Overtime register.</i>

## F. Incentive & commission compliance

RBI bars incentives that induce coercive recovery — incentive design is regulated. This is a SmartPRS DNA strength.

TOPIC	F1 — Compliance-gated incentive
Why	RBI bars stiff targets / high incentives that induce coercive recovery. <b>[RBI-NOW / DRAFT]</b>
What	Incentives must reward clean recovery, not pressure.
How	Cap incentives; drive the multiplier from a compliance score, not raw recovery.
SmartPRS	<b>[BUILT]</b> Compliance-gated incentive: a score (DRA + PCC + BGV + NDA + no-open-complaint) is checked at approval and a below-threshold override is recorded — advisory warn + audit, not yet a hard block.
Proof	<i>ComplianceController scoreFor(); RequestController decide() (incentive_low_compliance).</i>

TOPIC	F2 — Clawback / withholding on violations
Why	Discourage abusive / after-hours / fake-visit / false-PTP conduct. <b>[RBI-NOW / DRAFT]</b>
What	Withhold or reduce incentive on proven violations.
How	Auto-clawback fed by violation flags, with an audit trail.
SmartPRS	<b>[BUILT]</b> Clawbacks / reversals; paid entries are locked (corrections are new clawbacks).
Proof	<i>clawbacks; locked commission entries.</i>

TOPIC	F3 — Transparent incentive statement
Why	Auditability and agent trust.
What	Show how every payout was earned.
How	Per-agent statement folded into payroll.
SmartPRS	<b>[BUILT]</b> Transparent per-entry incentive statement with full history.
Proof	<i>commission_logs; incentive statement.</i>

## G. Data privacy & information security (DPDP)

The agency is a Data Processor for the bank / NBFC Data Fiduciary — controls must be demonstrable.

TOPIC	G1 — Role-based access control
Why	DPDP access-control duty; RBI confidentiality. <b>[DPDP / RBI-NOW]</b>
What	Least-privilege access; one user = one login.
How	RBAC with per-role screen / data gating; no shared logins.
SmartPRS	<b>[BUILT]</b> Role-based access control: a per-role module / action permission matrix; sensitive report / export endpoints are server-side gated.
Proof	<i>AppController PERM_NAV / applyPerms / spCan; ReportController denyUnlessRole.</i>

TOPIC	G2 — Field-level PII masking
Why	Raw PAN / UAN / bank / Aadhaar on screen is a DPDP exposure. <b>[DPDP]</b>
What	Mask sensitive fields by role.
How	Masking layer with logged unmasking.
SmartPRS	<b>[ROADMAP]</b> Field-level PII masking for low-privilege roles is designed, not yet built.
Proof	<i>planned masking layer keyed to RBAC.</i>

TOPIC	G3 — Access / download / export logs
Why	DPDP accountability; logs retained $\geq 1$ year. <b>[DPDP]</b>
What	Log who viewed / exported what.
How	Read + export logging with user and scope.
SmartPRS	<b>[BUILT]</b> Access / export logging: every report export is written to the tamper-evident audit trail.
Proof	<i>activity_logs (report_export); ReportController export().</i>

TOPIC	G4 — Ex-employee access deactivation
Why	Ex-employee access is the highest-severity breach risk. <b>[DPDP / RBI-NOW]</b>
What	Revoke access immediately on exit.
How	Exit event auto-revokes login and linked systems.
SmartPRS	<b>[BUILT]</b> Ex-employee access audit flags active logins still held by exited staff (advisory report; automatic revoke is the next step).
Proof	<i>Reports -&gt; Ex-employee access audit (exemp-access; Risk = ACTIVE LOGIN).</i>

TOPIC	G5 — Data retention controls
Why	DPDP purpose-limitation / retention. <b>[DPDP]</b>
What	Retain data only as long as needed (e.g., recordings 6 months).
How	Configurable retention windows.

<b>SmartPRS</b>	<b>[ROADMAP]</b> Automated retention purge / anonymise on expiry is designed; a retention setting exists.
<b>Proof</b>	<i>data_retention_months setting; purge job pending.</i>

TOPIC	G6 — Encryption at rest
<b>Why</b>	DPDP security safeguard. <b>[DPDP]</b>
<b>What</b>	Protect sensitive data at rest.
<b>How</b>	Encrypt PAN / bank / Aadhaar and credentials.
<b>SmartPRS</b>	<b>[PARTIAL]</b> Secrets / settings encryption is in place; full PII encryption-at-rest is the remaining hardening.
<b>Proof</b>	<i>encrypted settings; field / DB PII encryption pending.</i>

## H. Conduct enablement (HR/payroll side of RBI recovery rules)

The workforce-management hooks that keep recovery conduct lawful.

TOPIC	H1 — Calling / field-hours policy
Why	Contact only 08:00–19:00. <b>[RBI-NOW / DRAFT]</b>
What	Roster and policy reflect lawful contact hours.
How	Align shifts / roster to 08:00–19:00; publish and acknowledge the policy.
SmartPRS	<b>[BUILT]</b> Contact-window (8 a.m.-7 p.m.) settings + {{contact_hours}} letter merge + Code of Conduct publish; live calling-time enforcement is the SmartDCM side.
Proof	<i>SettingsController contact_window_start / end; LetterController {{contact_hours}}; Code of Conduct.</i>

TOPIC	H2 — Grievance-lock awareness
Why	No recovery while a grievance is pending; tighter in the draft. <b>[RBI-NOW / DRAFT]</b>
What	Do not reward recovery on locked accounts.
How	Suspend incentive accrual on accounts flagged grievance-pending.
SmartPRS	<b>[BUILT]</b> Grievance-lock awareness: approving an incentive while a complaint is open is recorded in the audit log.
Proof	<i>activity_logs (grievance_pending_incentive); RequestController decide().</i>

TOPIC	H3 — Bank + portfolio authorisation
Why	Agents must carry authorisation naming bank / portfolio + grievance officer. <b>[RBI-NOW / DRAFT]</b>
What	Map and authorise agents per bank / portfolio.
How	Maintain an authorisation register feeding the authorisation letter.
SmartPRS	<b>[BUILT]</b> Bank + portfolio authorisation register (bank, portfolio, authorisation number, validity).
Proof	<i>agent_authorizations.</i>

TOPIC	H4 — Grievance-officer details on records
Why	Every recovery communication must carry grievance-officer details. <b>[RBI-DRAFT]</b>
What	Maintain and surface grievance-officer information.
How	Config field auto-populated into letters / communications.
SmartPRS	<b>[BUILT]</b> Grievance-officer name / phone / email on the company master, merged into letters and notices.
Proof	<i>companies (grievance_officer / phone / email); LetterController merge.</i>

# I. Bank-wise eligibility & audit readiness

The differentiators — proving compliance per agent, per bank, in one click.

TOPIC	I1 — Per-agent consolidated compliance flag
Why	An RE may engage only verified / certified / eligible agents. <b>[RBI-NOW / DRAFT]</b>
What	One status combining appointment / PF / ESI / DRA / BGV / authorisation.
How	A computed eligibility object per agent (green / amber / red + reasons).
SmartPRS	<b>[PARTIAL]</b> A compliance score exists; surfacing it as one red / amber / green readiness flag everywhere is the next step.
Proof	<i>ComplianceController scoreFor(); flag UI pending.</i>

TOPIC	I2 — Bank-wise eligibility register
Why	Different banks impose different requirements.
What	Map each agent's eligibility per bank / portfolio.
How	Eligibility register exposed to allocation.
SmartPRS	<b>[PARTIAL]</b> Portfolio / authorisation + eligibility logic exist; a dedicated bank-wise eligibility register screen is pending.
Proof	<i>agent_authorizations; ComplianceController portfolio logic.</i>

TOPIC	I3 — One-click Recovery Agent Audit Pack
Why	Vendor audits demand a complete per-agent file. <b>[RBI-NOW outsourcing]</b>
What	Produce a bank / portfolio / month audit file on demand.
How	Assemble payroll + PF/ESI + DRA + BGV + CoC + authorisation + activity into an indexed pack.
SmartPRS	<b>[ROADMAP]</b> One-click Recovery Agent Audit Pack: SmartPRS already holds 14 of 18 evidence blocks; assembly + signing pending.
Proof	<i>audit-trail signed export (J2) is the integrity backbone.</i>

TOPIC	I4 — Document & statutory vault
Why	Auditors ask for registrations, challans and certificates.
What	A central, retrievable evidence store.
How	Vault for GST / Shops / PF / ESI / PT registrations, challans, certificates.
SmartPRS	<b>[BUILT]</b> Document & statutory vault with kind / status / expiry tracking.
Proof	<i>documents (kind, status, expiry).</i>

## J. Governance & lifecycle

Clean policy, an immutable audit trail, and disciplined offboarding.

TOPIC	J1 — Board-approved policy repository
Why	The draft requires a board recovery / collection policy + code of conduct. <b>[RBI-DRAFT]</b>
What	Maintain current, versioned policy documents.
How	A policy repository with versioning and acknowledgements.
SmartPRS	<b>[BUILT]</b> Versioned Policy Repository (owner, board-approval date, acknowledgement-required, status).
Proof	<i>policies master; Knowledge Base -&gt; Policy Repository.</i>

TOPIC	J2 — Immutable activity / audit logs
Why	Accountability across actions and approvals. <b>[DPDP / RBI]</b>
What	A tamper-evident record of actions and approvals.
How	Activity logs + approval audit columns; immutable export.
SmartPRS	<b>[BUILT]</b> Hash-chained, tamper-evident audit trail with a signed, verifiable export and integrity check.
Proof	<i>App\Services\Audit (record / verify); Reports -&gt; Audit trail (signed).</i>

TOPIC	J3 — Exit clearance checklist
Why	Clean offboarding (assets, ID, access). <b>[RBI / DPDP]</b>
What	A structured exit clearance.
How	Checklist: ID surrender, asset return, access revoke, FnF, re-hire flag.
SmartPRS	<b>[BUILT]</b> Structured exit clearance: ID surrender, asset return, access revoke, DRA-ID return, FnF, re-hire flag.
Proof	<i>exits clearance fields; Exit &amp; FnF screen.</i>

## SmartPRS readiness scorecard

Across the 45 topics: **35 delivered now**, **7 in progress**, **3 on the roadmap** — sequenced for 1 October 2026. Status verified against the live codebase (controllers, master defs, screens, routes, migrations). In progress: appointment-letter type + document vault (A1), DRA hard-block gate (B2), minimum-wage payslip flag (D1), Form 16 + live TDS filing (D6), encryption-at-rest for PII (G6), consolidated readiness flag (I1) and bank-wise eligibility register (I2). Roadmap: PII masking (G2), retention purge (G5), one-click Audit Pack (I3).

Section	Delivered now	In progress	Roadmap
A. Onboarding & engagement	A2, A3, A4, A5	A1	—
B. DRA / IIBF certification	B1, B3, B4	B2	—
C. BGV / police verification	C1, C2, C3	—	—
D. Statutory payroll	D2, D3, D4, D5, D7, D8, D9, D10	D1, D6	—
E. Attendance & records	E1, E2, E3	—	—
F. Incentive & commission	F1, F2, F3	—	—
G. Data privacy & security	G1, G3, G4	G6	G2, G5
H. Conduct enablement	H1, H2, H3, H4	—	—
I. Eligibility & audit	I4	I1, I2	I3
J. Governance & lifecycle	J1, J2, J3	—	—

### The SmartPRS promise, in one line

For every recovery agent, prove — in one place, soon in one click — that the person is onboarded, paid, verified, certified, authorised and eligible, and that their conduct stayed within the rules.

### Disclaimer

*This manual is a product-education and compliance-planning document, not legal advice. The 1 October 2026 RBI directions are a draft, not yet final law. Feature status badges reflect the current SmartPRS build and are updated each release. Confirm exact rates, statutory file formats and effective dates against the live official notifications.*