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# **SOCIAL SECURITY PORTABILITY IN A MULTI-EMPLOYER ECONOMY: EPFO, UAN ARCHITECTURE, AND LEGAL GAPS UNDER THE CODE ON SOCIAL SECURITY, 2020**

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## **ABSTRACT**

Social security portability in India was once simply a matter of statutory rights. It is actually about the worker being able to take along their contribution history, service credit, and benefit entitlement through frequent changes of employers without losing their identity, hitting procedural dead-ends, or being subjected to discretionary delays. This research looks at the portability facilitated by the Employees Provident Fund Organizations UAN-centered digital infrastructure and the transitional setup being drawn up under the Social Security code, 2020. It claims that the UAN, e-KYC, auto-settlement, and transfer workflow reforms have allowed for greater throughput and lessened employer-dependent choke points, with measurable gains being evident in the settlement and transfer figures reported through the official releases. Nevertheless, portability, to some extent, still depends on contingency as the legal provisions concerning coverage, attribution, timelines, and error correction are indeterminate, unevenly enforceable, or by nature incompatible with the dynamics of a multi-employer economy characterized by contracting, platform aggregation, and inter-State mobility. The paper sets out to describe the core set of statutory provisions under the Employees Provident Funds and Miscellaneous Provisions Act, 1952 and schemes, the role of subordinate governance through circular-driven workflow design, and case law development on principal employer liability, exempted establishment enforcement, wage base integrity, and limits to Aadhaar-linked compulsion. It sees service delivery metrics as indirect evidence supporting the argument that administrative capacity should come first, however, it still believes that portability is at the end of the day a legal design clause that can only be properly developed via legally binding standards, well-thought-out orders and clear allocation. The research proposal ends up with rule-level changes consistent with digital process capability, which are expected to maintain inclusion and at the same time

safeguard privacy, enhance service-credit integrity under pension architecture, and lessen portability failures that today are considered the workers' transaction costs of labor market churn.

**Keywords:** EPFO, UAN, portability, platform workers, Code on Social Security 2020

## Introduction

Portability issues crop up if a workers legal social security account is seen as attached to a single employer in an employer-rotational labor market. In India, workers keep moving from one organization to another, one city to another, from contractors to aggregator-led assignments, which brings with it several occasions when records can be broken or benefits can become hardly accessible.<sup>1</sup>

Portability as we understand and define it in this research includes uninterrupted provident fund savings and pension service credit, almost no friction in moving from one employer to another, and accessing one's rights that are legally available regardless of employer, location, or working arrangement of the employee. Thus, portability is not only an economic term referring to the transfer of account balances. It also covers aspects such as adjustment capability in case of identity errors, safeguarding of pensionable service, and little or no change in the time required for officials to complete the operations. At the heart of the debate is the idea that a good social welfare law should result in a continuity experience that can be enforced.<sup>2</sup>

India's labor market, which has a very high turnover rate, greatly increases the risk of portability because the change of job usually comes with new payroll identifiers, different wage structures that are not standardized, and occasionally non-compliance by the employers who act as intermediaries. Hiring contract staff and accepting fixed-term workers can lead to a series of contribution spells of a few months each, whereas migration results in mismatching of documents across different jurisdictions. Platform work provides additional income sources which are not automatically reflected in the single employer's compliance record. In such situations discontinuity becomes something you can expect, and the workers have to bear the

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<sup>1</sup> V K Kharbanda and Vipul Kharbanda, *Commentaries on Employees' Provident Funds and Miscellaneous Provisions Act, 1952* (4th edn, Law Publishing House 2024) 121.

<sup>2</sup> S C Srivastava, *Industrial Relations and Labour Laws* (9th edn, Vikas Publishing 2026) 156.

responsibility for re-stitching the records through their procedural effort and time lost.<sup>3</sup>

Digital rails introduced by the EPFO, especially the UAN architecture and portal workflows, have increased the ability for continuity by centralizing identity, allowing online claims, and lessening employer attestation dependence in several processes.<sup>4</sup> Such changes are of direct portable-use value because they solve the frustration points of the multi-employer careers. However, the legal blueprint of portability, besides statutory coverage, liability allocation, and correction standards, also depends on these three areas. Legacy and Code-era frameworks in these areas are still lacking or are considered unsettled.

The main argument put forward is that the UAN-led system has significantly enhanced the portability throughput and lowered the friction, however, the legal loopholes still exist under the Code on Social Security, 2020 in the areas very much related to a multi-employer economy such as platform-mediated work coverage, contribution attribution across various aggregators, enforceable timelines for transfers and corrections, and protection against identity-based exclusion. The study considers these loopholes to be doctrinal failures as they result in an unequal continuity that is extended to certain categories of workers only, even when the technical capacity is present.<sup>5</sup>

Methodologically, the study is based mainly on the Employees' Provident Funds and Miscellaneous Provisions Act, 1952, the Employees' Provident Funds Scheme, 1952, the Code on Social Security, 2020, and the Digital Personal Data Protection Act, 2023 where identity and data governance become legally material.<sup>6</sup> Besides these primary sources of legislation, it throws light on notifications, circulars, and portal workflow reforms as lesser governance that gives shape to the legal experience. The use of case law here is to locate the binding obligations, the limits of the discretion, and the judicial handling of the situations where non-compliance has either been regarded as a problem of enforcement or as a burden imposed on workers.

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<sup>3</sup> Nurulsyahirah Taha, Karin Astrid Siegmann and others, 'How Portable Is Social Security for Migrant Workers? A Review of the Literature' (2015) 68 *International Social Security Review* 95.

<sup>4</sup> Press Information Bureau, Government of India, 'EPFO Achieves Historic Milestone of Settling Over 5 Crore Claims in FY 2024-25: Dr Mansukh Mandaviya' <https://www.pib.gov.in/PressReleasePage.aspx?PRID=2100310&reg=3&lang=2> accessed 19 February 2026.

<sup>5</sup> Robert Holzmann, 'Bilateral Social Security Agreements and Pensions Portability: A Study of Four Migrant Corridors Between EU and Non-EU Countries' (2016) 69 *International Social Security Review* 109.

<sup>6</sup> *Employees' Provident Funds and Miscellaneous Provisions Act 1952* (Act 19 of 1952).

## Portability Problem in a Multi-Employer Economy

A multi-employer economy challenges social security law as continuity requires stable identity and predictable administrative completion, two things that cannot be assumed under labor churn. Portability failures are a kind of hidden transaction cost that workers bear due to delayed transfers, fragmented pension service, and reduced benefit access. The legal question is far more than just if contributions were due; it is whether continuity is guaranteed throughout the work-life and across the performing capacity of multiple entities.<sup>7</sup>

## Labour Mobility and Fragmented Employment

It is typical for a worker in India to shift his employment through contractors, short-term contracts, and migration from one State to another. Such actions result in a worker's contribution history being non-continuous, and also cause mistakes in the worker's identity. The worker can potentially be given different payroll IDs at each of the new establishments he/she chooses to work at but legally, the worker would still be covered under the same statutory scheme. Hence, the accounts of the worker members get divided into various member IDs. When there is a failure in the validation of Aadhaar, bank, or name matching, the system may create different identities for the same person which later hamper transfer and withdrawal operations. Typically, the problems that arise from here are the existence of multiple UANs, KYC mismatches, non-transferred accumulations, and pension service being split into parts.<sup>8</sup>

## What Portability Requires

Portability implies that the legal and technical frameworks need to be oriented in such a way that continuity is treated as the default option rather than one that is given only as an accommodation. It hinges on the fact that a worker has the same identity everywhere, that KYC is done easily and effectively, that the whole process of transfer after changes is done automatically without having to intervene, that the service credit is used for the calculation and pension purposes and that there is a grievance mechanism with standard time for resolution. In the context of account portability, it is primarily about the transfer and consolidation of the provident fund while the coverage portability is about whether workers changing categories

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<sup>7</sup> PRS Legislative Research, 'Code on Social Security, 2020' <https://prsindia.org/billtrack/code-on-social-security-2020> accessed 11 February 2026.

<sup>8</sup> Guy Standing, *The Precariat: The New Dangerous Class* (1st edn, Bloomsbury Academic 2011) 88.

remain eligible without falling outside thresholds. The reason this difference is important is that even the most efficient transfer tool cannot solve the problem of exclusion from coverage where the work form itself is not mapped into the contributory design.<sup>9</sup>

- Single persistent worker identifier across establishments and intermediaries<sup>10</sup>
- KYC and bank verification that tolerates common documentation variance
- Automated transfer completion with auditable system logs
- Pension service continuity preserved across member identifiers
- Time-bound correction and grievance disposal with liability allocation

### **Institutions Involved**

Portability results depend on how these various entities interact- EPFO field offices, employers, exempted trusts, contractors, aggregators, banks, and the Aadhaar-based KYC ecosystem. An employer submits e-returns and takes compliance measures, while EPFO verifies and approves the settlement of claims through portal workflows. Exempted trusts run dual record systems of accumulation which subsequently have to be incorporated in the EPFO systems. Contractors and platforms act as intermediaries between the worker and the principal establishment, thus impacting the worker attribution and the compliance visibility. There is still substantial room for administrative discretion at the stages of approval, verification, and exception handling based on statutory powers.<sup>11</sup>

### **EPFO and UAN Architecture**

The EPFO digital revolution has redefined the portability issue as a systems one that revolves around a single identity layer and automated workflow checks. The UAN acts as the main tool for maintaining continuity, whereas the portal processes are used for claims, corrections, and transfers. This part discusses the configuration as a legal experience, since the design of the

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<sup>9</sup> Robert Holzmann and Jacques Wels, 'The Cross-Border Portability of Social Security Benefits: Status and Progress?' (2020) 73 *International Social Security Review* 65.

<sup>10</sup> Mukul G Asher and Amarendu Nandy, 'Reforming Provident and Pension Fund Regulation in India' (2006) 14 *Journal of Financial Regulation and Compliance* 273.

<sup>11</sup> Employees' Provident Fund Organisation, 'For Employees' [https://www.epfindia.gov.in/site\\_en/For\\_Employees.php?id=sm8\\_index](https://www.epfindia.gov.in/site_en/For_Employees.php?id=sm8_index) accessed 13 February 2026.

workflow has an impact on access, delay, and allocation of liability, which can either help to achieve or lessen the statutory benefit objectives.<sup>12</sup>

### **EPFO Digital Governance Model**

EPFO runs a centralized compliance and service architecture that basically offers member services around UAN-based identification and employer e-returns. Employer filings via electronic challan-cum-return system generate contribution records that the portal later uses for claims and transfers. Online claim submission, rule-based validation, and auto-settlement cut down the requirement of office-level approvals for eligible cases. KYC validation and bank verification work as access controls for claim settlement. Such a governance model moves the portability decision from local office discretion to system-defined rule execution.<sup>13</sup>

### **UAN Lifecycle and Identity Layer**

The UAN serves as a unique and unlimited worker ID by linking different member IDs across different establishments to one single continuity key. KYC validation, Aadhaar seeding, and bank verification help restrict unauthorized portal access and claim processing activities. Besides this, the system also acknowledges the risk of exclusion in case of missing Aadhaar linkage to the legacy accumulations. A statement from the official sources reveals that the bulk UAN generation for certain past accumulation without Aadhaar was accompanied by a frozen status until the Aadhaar seeding, which is interpreting a calibrated design between inclusion and identity security safeguards.<sup>14</sup>

### **Claim Settlement Architecture and Automation**

Auto-settlement has been legal relevance in that it changes entitlement into ready access by cutting down the procedure dependency on local scrutiny for the cases of the standard claims. The EPFO's ability to maintain continuity and deliver at volume is evident from the scale of claims and disbursements reported, which is of importance in the area of multi-employer work where there are repeated claims for transfers and advances. The introduction of the figure below is to facilitate a doctrinal assumption: if settlement throughput is visibly high, that is, the

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<sup>12</sup> Reetika Khera (ed), *Dissent on Aadhaar: Big Data Meets Big Brother* (1st edn, Orient BlackSwan 2019) 210.

<sup>13</sup> Ravichandran Narasimhan, Joy P Vazhayil and others, 'Employees' Provident Fund Organization: Empowering Members by Digital Transformation' (2018) 18 *Journal of Public Affairs* e1844.

<sup>14</sup> Employees' Provident Fund Organisation, 'EPFO Member e-Sewa Portal' <https://unifiedportal-mem.epfindia.gov.in/memberinterface/> accessed 15 February 2026.

portability failures, the departures which still remain, are more probably to be caused by coverage rules, identity exclusions, and exception handling rather than by simple lack of maternity.<sup>15</sup>

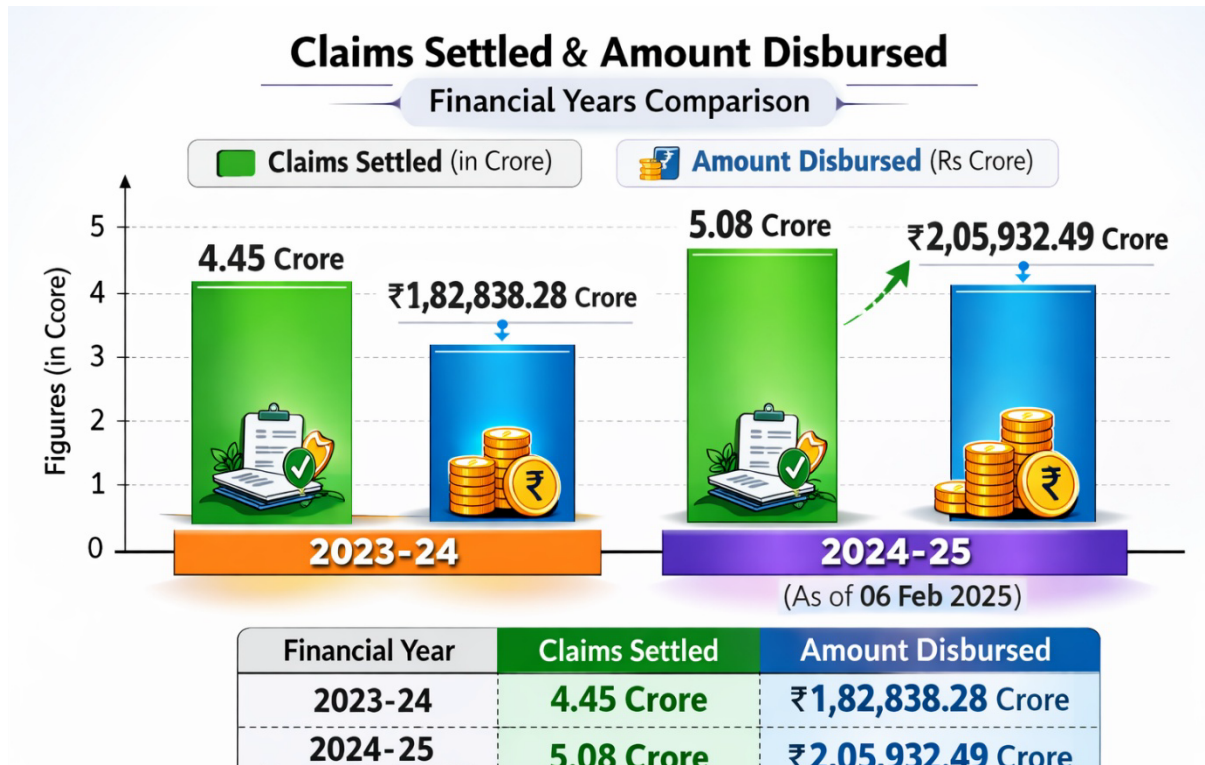


Figure 1. Claims settled and disbursement totals reported for selected years in PIB release.<sup>16</sup>

The reported reduction in the time taken to process auto-validated claims serves as a supporting argument for the idea that rule-based validation can effectively convert statutory entitlement into near-real-time access for eligible categories.<sup>17</sup> In terms of portability, this lessens the opportunity cost of making work transitions frequently, especially if advances are utilized as substitutes of liquidity during periods out of work. However, automation makes a distinction between eligible and exception cases more clearly, therefore, cases of identity mismatch, data inconsistency, or employer filing errors can still cause a worker to be redirected to slower, discretionary channels. Hence, portability planning needs to have responsible exception

<sup>15</sup> Press Information Bureau, Government of India, ‘EPFO Achieves Historic Milestone of Settling Over 5 Crore Claims in FY 2024–25: Dr Mansukh Mandaviya’ (n 4).

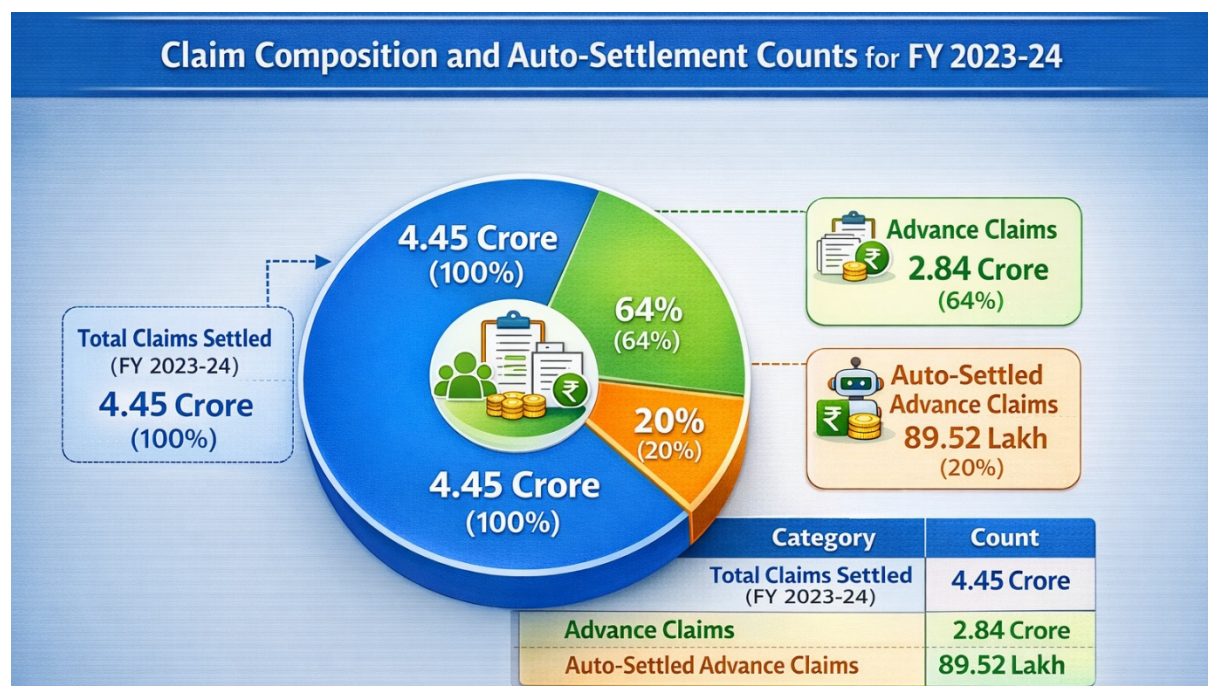
<sup>16</sup> Ibid.

<sup>17</sup> Ibid.

mechanisms.

### Composition of Claims and Auto-Mode Penetration

Claim composition is doctrinally significant because it shows the legal entitlements that are most often invoked and which changes in the workflow have the most direct impact on the employees' experience. When most of the claims are for advances, automation mainly changes the possibility of getting a partial withdrawal without a final settlement, thus it influences the way that workers handle income volatility in a highly unstable labor market. The table also allows us to conclude that the mere consideration of transfer logic does not suffice for an assessment of portability gains; the evaluation should also take into account how frequently the members use advances as a tool for functional continuity when they change jobs, as it is indicated in the official releases.<sup>18</sup>



**Figure 2.** Claim composition and auto-settlement counts reported for FY 2023-24.<sup>19</sup>

The large percentage of advance claims shows that members frequently interact with the system in an episodic manner and not only at retirement or final exit. The frequency of this interaction

<sup>18</sup> Press Information Bureau, Government of India, 'EPFO Expands "Ease of Living": Reducing Service Delivery Time for Claim Settlement' <https://www.pib.gov.in/PressReleasePage.aspx?PRID=2020461&reg=3&lang=2> accessed 18 February 2026.  
<sup>19</sup> Ibid.

greatly raises the importance of precise identity matching and efficient correction procedures, as even small data mismatches can lead to access interruption over and over again. The fact that auto-settlement is a high percentage of overall settlements also means that rule-based eligibility checks are the main method of Decision and are trusted at scale. That trust can be extended to transfers and service-credit updates, provided that they are subject to audit and that the rules for liability are clear in case of faulty denial.<sup>20</sup>

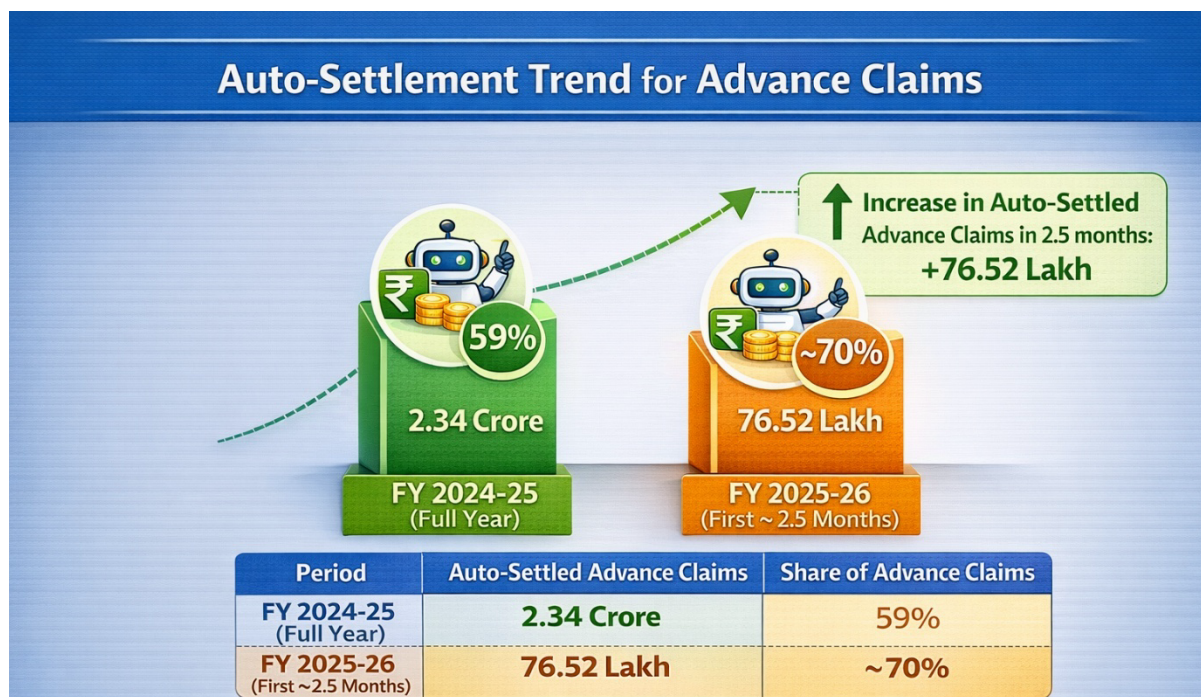
### **Expansion of Auto-Settlement Limits and Volume Growth**

Increasing the auto-settlement limit is indicative of a policy decision that automated validation is considered legally sufficient for even higher value transactions. A higher auto-settlement limit, therefore, has an impact on worker portability because workers in transition can get their larger amounts of money quicker - without an extended, office-mediated review - thus there will be less dependence on employer cooperation during job changes. The figure below is used to support an inference of a systemic migration toward automation: a rising auto-settlement volume and share imply that the EPFO is internally staffed to extend automated logic not only to the completion of the transfer but also to the integrity of service-credit, provided that legal standards are there to handle exceptions.<sup>21</sup>

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<sup>20</sup> Santosh Mehrotra and Kingshuk Sarkar, 'Social Security Code, 2020 and Rules: A Critique' (2021) 56 *Economic & Political Weekly* 17.

<sup>21</sup> National Portal of India, 'Employee Provident Fund Member Passbook' <https://www.india.gov.in/spotlight/employee-provident-fund-member-passbook> accessed 17 February 2026.



**Figure 3. Auto-settlement trend and share reported for advance claims.**<sup>22</sup>

The increase in share as reported means that more of the claims are getting resolved without human involvement. It is recognized that this can lessen the compliance friction that is a heavy burden for workers with a short tenure or those who work in several establishments. However, the very same trend increases the importance of data governance because automated decisions, by their nature, can increase both access and exclusion on a large scale. If there are discrepancies in identity or wage data, automation will lead to refusal becoming even more deeply entrenched unless the correction mechanisms are not only enforceable and time-bound but also capable of rectifying the errors at the source without any procedural complexity.<sup>23</sup>

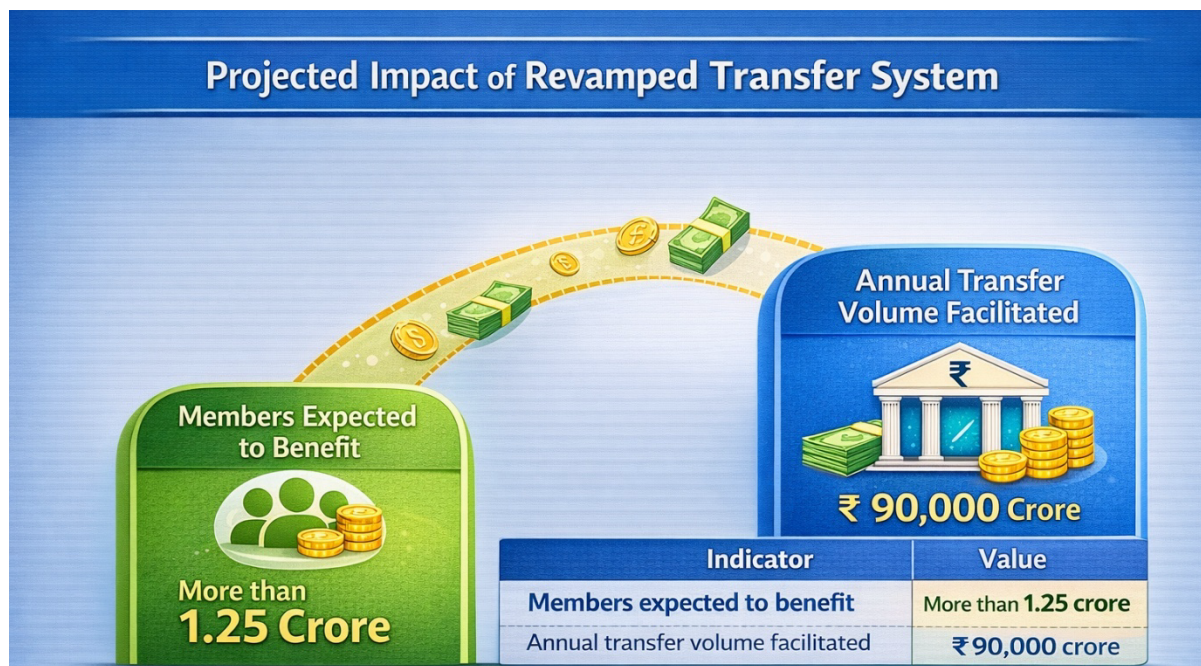
### Transfer Workflow Reforms and Portability

Transfer workflow reform is at the heart of portability as provident fund continuity assumes that the worker's accumulations are what follow the worker and not that they should remain stranded at the old establishments. Legally, the revamped Form 13 functionality is significant as it reassigns procedural roles between offices and removes dependencies for approvals which

<sup>22</sup> Press Information Bureau, Government of India, 'EPFO Enhances Auto-Settlement Limit for Advance Claims to ₹5 Lakhs, Ensuring Faster Access to Funds for Members' <https://www.pib.gov.in/PressReleasePage.aspx?PRID=2139291&reg=3&lang=2> accessed 14 February 2026.

<sup>23</sup> Employees' Provident Fund Organisation, 'EPFO Member Passbook Login' <https://passbook.epfindia.gov.in/MemberPassBook/login> accessed 18 February 2026.

were the cause of the delay. The figure below, with the support of an inference, shows that transfer reform has been presented as a systemic throughput measure along with a quantified beneficiary estimates and annual transfer volume as the projections in the official communication, which can be used as a baseline for assessing legal compliance with time-bound completion requirements.<sup>24</sup>



**Figure 4.** Reported beneficiary estimates and transfer volume projections for revamped transfer system.<sup>25</sup>

The elimination of destination office approval takes away the inter-office friction that used to make transfer be subject to local backlog and discretionary delay. Separating the taxable and non-taxable parts allows better compliance with the tax deduction rules and lessens the possibility of conflicts over tax treatment later on. A formal circular explaining the change presents it as merely a structural simplification of the transfer process, which in turn reinforces the continuity aspect for workers frequently changing employers. There are still some

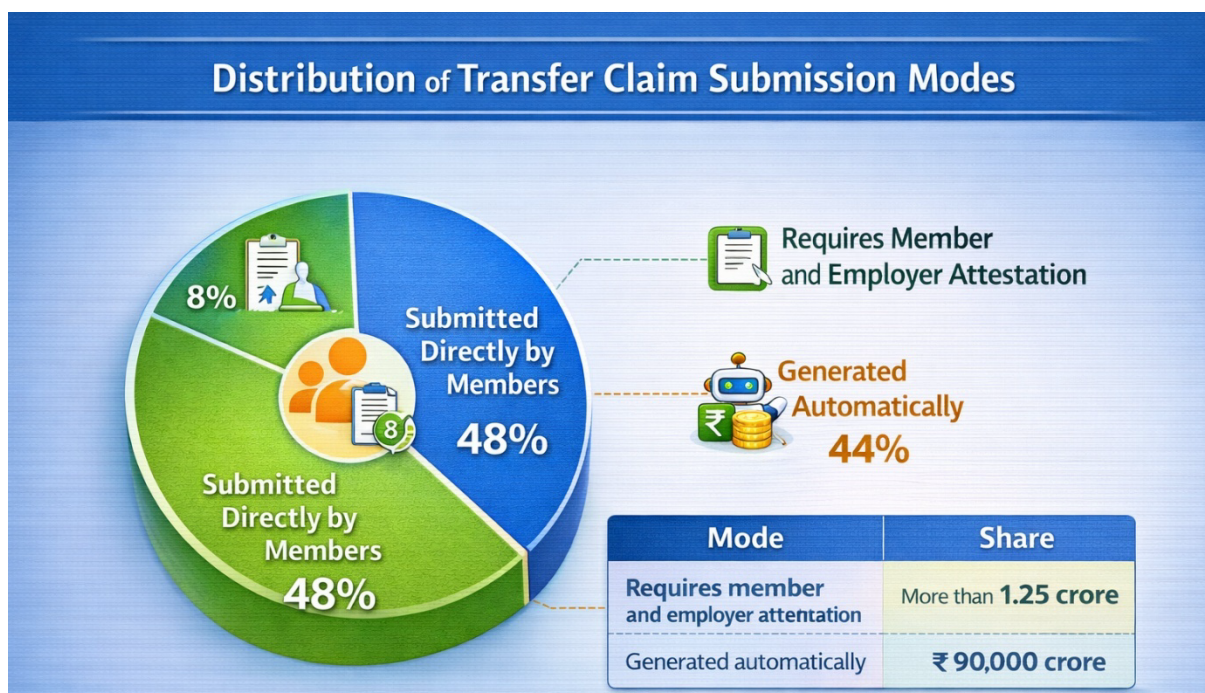
<sup>24</sup> Press Information Bureau, Government of India, ‘EPFO Simplifies Transfer Claim Process Through Revamped Form 13 Functionality; More Than 1.25 Crore Members to Benefit; Launches Facility for Bulk Generation of UAN by Employers without Aadhaar Seeding’ <https://www.pib.gov.in/PressReleasePage.aspx?PRID=2124244&reg=3&lang=2> accessed 16 February 2026; Employees’ Provident Fund Organisation, ‘Circular on Revamp of Form 13 (Online Transfer Claim) Functionality’ (April 2025).

<sup>25</sup> Ibid.

loopholes where timelines are not known to be legally enforceable and where responsibility for incorrect delay is not clearly determined.<sup>26</sup>

### Transfer Submission Mode Distribution

Submission mode distribution is important because it shows if portability still relies on employer attestation, thus creating a structural misalignment problem with high-churn employment. If self-submission or system-generated claims dominate, the freedom to move from one system to another becomes less dependent on employer cooperation and more a matter of system integrity and identity validation. The figure below lends weight to the conclusion that EPFO has significantly cut down on employer-dependent workflows for transfers, based on official reporting, which fortifies portability in scenarios where employment relationships are short or are through intermediaries.<sup>27</sup>



**Figure 5. Reported distribution of transfer claim submission modes.<sup>28</sup>**

The breakdown shared shows that most transfers are either given directly by members or

<sup>26</sup> Nandan Nilekani, T V Mohandas Pai and others, *Rebooting India: Realizing a Billion Aspirations* (1st edn, Penguin Random House India 2015) 172.

<sup>27</sup> Press Information Bureau, Government of India, ‘EPFO Achieves Historic Milestone of Settling Over 5 Crore Claims in FY 2024–25: Dr Mansukh Mandaviya’ (n 4).

<sup>28</sup> Ibid.

through system logic thus limiting the employers power to structurally veto continuity. In the case of multi-employer careers, it is a legally significant design feature that the probability of a workers statutory continuity right depend on a cooperative exit process is significantly decreased. However, there are still attestation shares and exception cases that continue to allow employer delay to be translated into benefit delay.<sup>29</sup>

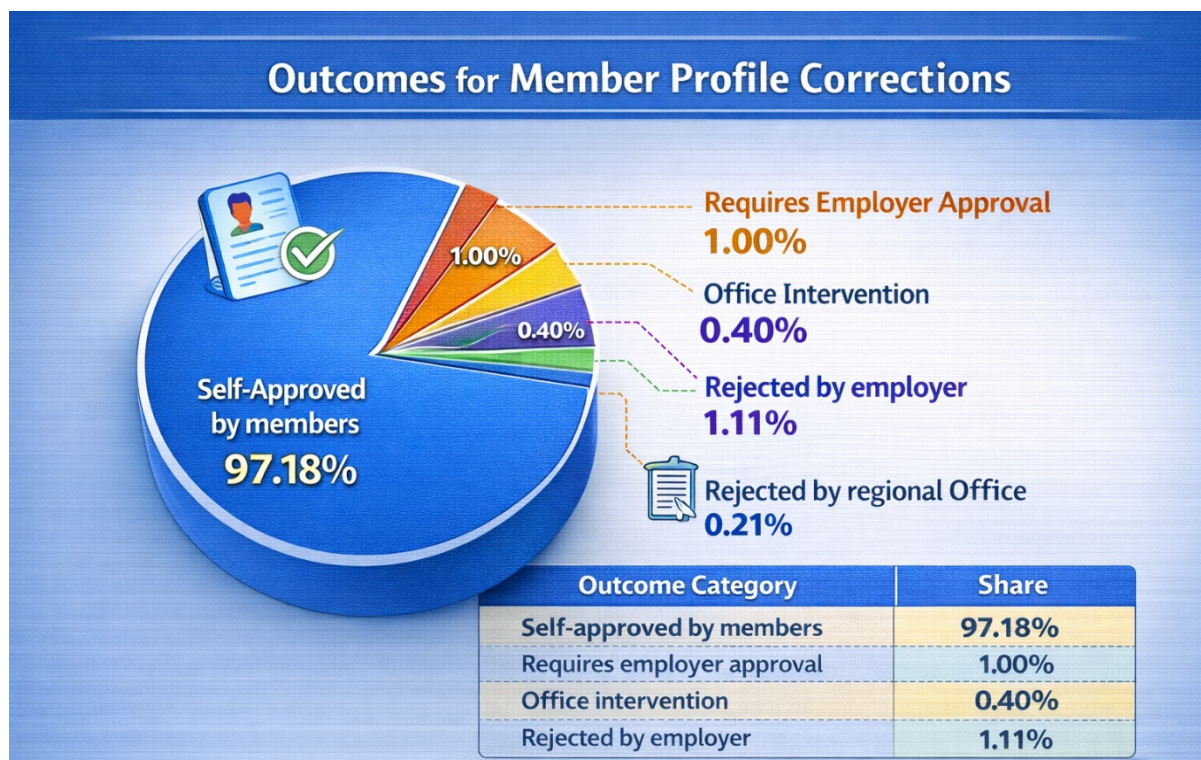
### **Member Profile Correction Autonomy**

Correction autonomy impacts portability very closely since one of the major issues that cause multiple identifiers, claim rejection, and transfer delay is identity mismatch. If correction is at the member level, legal access will be less dependent on the employer, but at the same time, it will bring up issues such as due process, auditability, and error attribution. The following figure has been presented to help support the argument that there has been a shift in governance: if self-approval is the predominant method of correction, then EPFO is transitioning to a model where workers will be procedurally responsible for keeping their identity correct and hence, it is absolutely necessary that there be safeguards against wrongful rejection and that correction should not become an indirect hurdle.<sup>30</sup>

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<sup>29</sup> Secki P Jose, 'India's Labour Reforms: The Informalisation of Work and Growth of Semi-formal Employment' (2022) 57 *Economic & Political Weekly* 53.

<sup>30</sup> Press Information Bureau, Government of India, 'EPFO Achieves Historic Milestone of Settling Over 5 Crore Claims in FY 2024–25: Dr Mansukh Mandaviya' (n 4).



**Figure 6. Reported outcomes for member profile corrections in PIB release.<sup>31</sup>**

Self-approval dominance is capable of facilitating backlog clearance and thus accelerating portability since transfer and claim are corrections by nature. However, when there are still some rejections, the legal framework must guarantee that the reasons are provided and that the remedies are available promptly. A portability system that depends on digital self-service needs to keep the accountability for the design of the system and for the effects of the wrongful denial. Employer and office refusal categories co-exist with each other, implying that discretion is still exercised through normal channels. These exception pathways require enforceable standards of fairness.<sup>32</sup>

### Structural Implications for Social Security Portability

Automation and less attestation will make inter-office struggles less likely and will bring better continuity in a multi-employer economy through making portability less reliant on cooperative employer exits. Transfer simplifications thereby, increase accumulation continuity and lower stranded balance risk. The same time, Aadhaar-linked safeguards are conditioning a type of access architecture, as identity verification can be both an instrument of fraud-control and a

<sup>31</sup> Ibid.

<sup>32</sup> ClearTax, 'EPF Withdrawal Online' <https://cleartax.in/s/epf-withdrawal-online> accessed 19 February 2026.

risk of exclusion where common is documentation variance. Judicial scrutiny of Aadhaar compulsion principles reveals that identity mesh should still be proportionate and legally authorized, not only technically convenient.<sup>33</sup>

### **Legal Framework and Case Law on EPFO Portability**

Portability under the EPFO system is basically a positive feature backed by a law that involves employer compliance duties and the methods in which authorities enforce these duties. A legal issue arises when in practice both resuming continuity correctly implies the right attribution of liability and, at the same time, without the worker being the sufferer of administrative failure. Judicial decisions play a pivotal role as they determine the correct manner in which the powers granted by the statute should be used and the distribution of the compliance burdens among the main employers, contractors, trusts exempted from the application of the statute, and authorities.<sup>34</sup>

### **Statutory Baseline**

Portability under the Employees Provident Funds and Miscellaneous Provisions Act, 1952 is essentially implemented through employer contributions, service records, and scheme-governed transfers, with statutory inquiry powers being used to find out the dues and also enforce compliance.<sup>35</sup> Section 7A is legally important as it establishes the adjudicatory mechanism for determining amounts due, thus it decides whether missing service is a problem of enforcement gap or that of the worker. Section 7A(1) provides that "may, by order determine the amount due from any employer ... and ... conduct such inquiry as he may deem necessary."<sup>36</sup> This is a very good idea; however, it has a lot of machinery involved in the practice.

### **Coverage and Multi-Employer Liability**

Disputes over multi-employer liability can happen when work is subcontracted through contractors, thus allowing facilities to easily refuse to link the worker with the principal employers statutory duty. Portability is weakened when attribution of contribution is challenged, as service history is then practically uncertain in law until such time enforcement

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<sup>33</sup> Nandan Nilekani, *Imagining India: The Idea of a Renewed Nation* (1st edn, Penguin Books India 2008) 201.

<sup>34</sup> H L Kumar, *Practical Guide to Employees' Provident Funds (Act, Rules and Schemes)* (15th edn, Universal Law Publishing 2019) 173.

<sup>35</sup> *Employees' Provident Funds and Miscellaneous Provisions Act 1952* (n 6).

<sup>36</sup> *Ibid.*

has been achieved. It is the principal employer notion and Section 7A investigation(a) duty that change the portability feature from a merely private dispute to a statutory enforcement duty. When the authority does not succeed in compelling the contractors' records production, the resulting gap may therefore be a continuity failure with which the workers are burdened. Hence, the court's requirement that the evidential material be of a certain standard is a measure that seeks to maintain portability.<sup>37</sup>

In *Food Corporation of India v Provident Fund Commissioner and Anr*<sup>38</sup>, the Supreme Court of India addressed the issue of a Section 7A determination for contract workers at depots where the statutory authority had relied on incomplete lists. The Court stated that "The Commissioner should use all his powers to collect all evidences and gather all the materials before reaching a proper conclusion."<sup>39</sup> At the instance, the case was referred back because the contractors were not summoned despite requests. The ruling considers the absence of identification not as a worker's fault but as a failure of jurisdiction in the inquiry, which is a direct indication of portability by locating the responsibility with the enforcement machinery.

### **Exempted Trusts and Transfer Breaks**

Exempted establishments pose a risk of portability because provident fund management is done through trusts, the records of which later have to be reconciled with EPFO systems for transfers, pension linkage, and service continuity. In cases where an exempted trust defaults, delays remittances, or has weak data integrity, it is the workers' continuity that suffers even though the wages were earned and deductions were made. Hence, the enforcement of provisions for exempted establishments acts as an incentive for continuity. The threat of damages and recovery provisions being enforced effectively will, in a way, exert legal pressure on exempted employers to be up to date with their contributions and keep accurate records, thus, later reducing transfer breaks and missing accumulations.<sup>40</sup>

In *Regional Provident Fund Commissioner v Hooghly Mills Company Limited* case<sup>41</sup>, the Supreme Court of India discussed the issue of whether Section 14B damages are applicable to

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<sup>37</sup> Employees' Provident Fund Organisation, 'For Employers' [https://www.epfindia.gov.in/site\\_en/For\\_Employers.php?id=sm8\\_index](https://www.epfindia.gov.in/site_en/For_Employers.php?id=sm8_index) accessed 12 February 2026.

<sup>38</sup> (1990) 1 SCC 68.

<sup>39</sup> *Food Corporation of India v Provident Fund Commissioner* (1990) 1 SCC 68 (Supreme Court of India).

<sup>40</sup> S N Misra, *Labour & Industrial Law* (27th edn, Central Law Publications 2013) 214.

<sup>41</sup> (2012) 2 SCC 489.

exempted establishments which have defaulted in provident fund contributions. The Court was of the view that "Section 14-B of the Act will be applicable" to such employers and finally decided "The appeal is allowed."<sup>42</sup> The main issue was whether employee benefits remained uninterrupted during exemption. The decision is a win for portability as it prevents exemption from becoming a compliance loophole through which employers are allowed contribution

### **Wage Base Disputes and Portability Outcomes**

Wage argument differently impact a worker's employment portability in that with different and inconsistent contribution bases coming from different employers, account balances and pensionable service outcomes get distorted. In high-churn employment situations, the worker quite possibly has different wage structures for every one of their jobs, and, to reduce their contribution liability, employers may split wage components into allowances. When splitting is done unevenly across establishments, the idea of continuity is simply a deception because the 'same' worker is getting assigned 'contributions' on different 'bases' across different jobs. Therefore, the courts' interpretation of the principles that govern what wages are to be included, to a great extent, affects the workers' portability, by thus, stabilizing the contribution base across employers and reducing the possibilities of classification practices that distort portability.<sup>43</sup>

In the matter of *RPF (II), West Bengal v Vivekananda Vidyamandir and Others*<sup>44</sup>, the Supreme Court of India considered the case of wages being split through broadly paid allowances across employees. The Court acknowledged that if payments are universally, necessarily and ordinarily given, then they would have the character of wages for provident fund purposes.<sup>45</sup> The issue was whether allowances form part of the contribution base. The decision is in favor of portability as it minimizes the employer-side variations in the bases of contribution, limits the distortions across different establishments, and makes the accumulated benefits to the worker more in line with the workers actual earnings structure.

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<sup>42</sup> *Regional Provident Fund Commissioner v Hooghly Mills Company Limited* (2012) 2 SCC 489 (Supreme Court of India).

<sup>43</sup> Akhilesh Mishra and Prasenjit Kundu, 'Theories and Practices of Labour Welfare in India: A Comprehensive Analysis' (2025) 5 *International Journal of Law, Justice and Jurisprudence* 215.

<sup>44</sup> (2019) 2 SCC 1.

<sup>45</sup> *RPF (II), West Bengal v Vivekananda Vidyamandir* (2019) 2 SCC 1 (Supreme Court of India).

## Aadhaar, UAN, and Access Litigation

Aadhaar linkage and UAN (Universal Account Number) linkage work as access controls that can turn a continuity enabling tool into a condition precedent, especially where identity data are inconsistent between different employments. Portability is negatively affected when benefits are practically withheld due to seeding failures, even when contributions are available and the worker is otherwise a member in good standing. Courts have examined if forcing people to do things that are not authorized by law is a breach of the limits set by the constitution and the principle of proportionality. This examination is necessary as the design of portability has to be a trade-off between fraud control and inclusion and it cannot be a mere matter of administrative convenience but must be grounded in the statutory authority.<sup>46</sup>

In the matter of *K. S. Puttaswamy (Aadhaar-5J) v Union of India*<sup>47</sup>, the Supreme Court of India examined the limits on the use of Aadhaar beyond the benefits of the State funded from the Consolidated Fund. It was held that Section 57 in so far as it permits use of Aadhaar ... in pursuant to any contract is unconstitutional and void.<sup>48</sup> The gist is that the compulsion of identity should be law-backed and proportionate, not contract-driven or without limits. In the EPFO portability case, this is interpreted as a requirement to create alternative verification methods when Aadhaar linkage is not successful.

In *Association of Industries and Institutions v Union of India*<sup>49</sup>, the Delhi High Court passed a part order on 17 September 2021 on the issue of coercive consequences of Aadhaar-UAN seeding. The Court recorded an interim restraint in the nature of no coercive action pending consideration of the matter.<sup>50</sup> The dispute between them was that the administration had insisted on seeding as an immediate compliance trigger. The intermediate issuance is doctrinally relevant to portability as it indicates that service access cannot be restricted by means of coercion when both legal authority and proportional safeguards are in dispute.

## International Workers and Cross-Border Portability

International worker coverage raises questions of portability that go even further than domestic

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<sup>46</sup> *K S Puttaswamy (Aadhaar-5J) v Union of India* (2019) 1 SCC 1 (Supreme Court of India).

<sup>47</sup> (2019) 1 SCC 1.

<sup>48</sup> *K S Puttaswamy (Aadhaar-5J) v Union of India* (n 46).

<sup>49</sup> WP(C) 5952/2021.

<sup>50</sup> *Association of Industries and Institutions v Union of India* WP(C) 5952/2021 (Delhi High Court, interim order dated 17 September 2021).

mobility as that involves the expatriate payroll structures, salary thresholds, social security agreements, and totalization logic. For cross-border continuity to exist, membership rules and contribution liability must be sufficiently predictable for multinational employers and expatriate employees. Legal uncertainty comes about where High Courts take different positions with regard to the validity of scheme provisions regulating international worker membership and whether salary-based exceptions are allowed. This kind of disagreement has an impact on the portability of international workers since contribution records can be disputed, and there is a risk that employers may receive conflicting compliance requirements from different jurisdictions.<sup>51</sup>

In the event of *Spice Jet Limited v Union of India*<sup>52</sup>, the Delhi High Court addressed the issue of the legal nature of a foreign worker's membership under the Employees Provident Funds Scheme, 1952. The Court supported the regulatory framework that considers international worker membership as compulsory under the scheme and thus, rejected the exclusion of salary-based workers in the absence of a valid statutory exception, stating that the circulars are in conformity with the Scheme.<sup>53</sup> The decision facilitates portability by cementing uniform membership continuity for expatriates, thus limiting employer's discretion to treat high-salary expatriates as outside the coverage.

In the matter of *Stone Hill Education Foundation v Union of India*<sup>54</sup>, the Karnataka High Court delved into the legality of certain scheme provisions relating to international workers' membership and their alignment with statutory limits. The Court disagreed with the provision in question and instead of paragraph 83 ... is hereby quashed, the Court held that the power to delegate scheme cannot override the statutory limits, thus the issuance of paragraph 83 was quashed by the Court.<sup>55</sup> The deviation from the Delhi decision results in ambiguity for cross-border portability, as membership continuity and employer compliance expectations can differ from one forum to another until a higher judicial settlement or a clear statutory amendment is brought about.

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<sup>51</sup> Jean-Michel Servais, *International Social Security Law* (4th edn, Kluwer Law International 2022) 97.

<sup>52</sup> 2025 SCC OnLine Del 8271.

<sup>53</sup> *Spice Jet Limited v Union of India* 2025 SCC OnLine Del 8271 (Delhi High Court).

<sup>54</sup> 2024 SCC OnLine Kar 425.

<sup>55</sup> *Stone Hill Education Foundation v Union of India* 2024 SCC OnLine Kar 425 (Karnataka High Court).

## Gig and Platform Workers and Portability

Portability of benefits for gig and platform workers is fundamentally different at the structural level because multi-aggregator work is intrinsic to the category, thus, employer-tethered continuity is conceptually incomplete. It is important to realize that definitions matter because a worker's legal eligibility and contribution design depend on whether they are considered a "gig worker", "platform worker", or part of an "aggregator" model under the Code on Social Security, 2020. Section 2 of the Code defines "gig worker" as "a person who performs work ... outside of traditional employer-employee relationship." It defines "platform worker" as "a person engaged in ... work through an online platform." It defines "aggregator" as "a digital intermediary ... connecting buyer and seller of services." These definitions set up a multi-principal work model.<sup>56</sup>

Regarding the case of *The Indian Federation of App-Based Transport Workers (IFAT) v Union of India*<sup>57</sup>, the Supreme Court of India through their order dated 18 February 2025 addressed the delay in putting the welfare architecture for app-based workers into operation. The Court noted that the Union shall file an affidavit showing the status of the steps taken towards social security measures and the matter was listed for further compliance monitoring.<sup>58</sup> This order is doctrinally significant as it considers delay as justiciable when statutory welfare architecture is present, thus, it is seen as a strengthening of the argument that portability for multi-aggregator work needs legally binding timetables and not just policy intentions.

That case was *Central Board of Trustees v Registrar, Central Government Industrial Tribunal*, in which the Calcutta High Court examined if a damages order was valid if the calculation and reasoning were missing. The Court upheld the tribunal's opinion and noted that it "needs no interference and is therefore confirmed", hence decided that "WPA 1945 of 2025 is dismissed."<sup>59</sup> The main holding of the case justifies portability governance since reasoned orders are especially necessary when penalties and damages affect the employer incentives to keep accurate records and make timely remittances, which in turn support continuity.

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<sup>56</sup> Girish Gupta, 'An Analysis of Rajasthan Platform Based Gig Workers (Registration and Welfare) Bill 2023: A Step Toward Social Security for Gig Workers' (2025) 11 *International Journal of Law* 72.

<sup>57</sup> WP(C) 1068/2021.

<sup>58</sup> *The Indian Federation of App-Based Transport Workers (IFAT) v Union of India* WP(C) 1068/2021 (Supreme Court of India, order dated 18 February 2025).

<sup>59</sup> *Central Board of Trustees v Registrar, Central Government Industrial Tribunal* [2025] 181 taxmann.com 313 (Calcutta High Court).

## Code on Social Security, 2020: Portability Promises and Legal Gaps

The Code on Social Security, 2020, offers the promise of consolidation of social security laws and aims at a single registration and welfare coverage of all categories of workers. Portability is frequently mentioned as a desired outcome of consolidation. However, simply consolidating the laws does not guarantee the issuance of enforceable continuity requirements, and the way the transition is designed can create legal uncertainty if the old schemes continue to be in force while the rules and schemes under the Code are still in the pipeline or being phased.<sup>60</sup>

### Consolidation and Continuity

The Code brings together several pieces of legislation into one comprehensive legal framework and thus seeks to simplify the definitions, the categories of coverage, and the governance of the institutions. ] Consolidation does not mean portability because continuity needs operational rules for transfer, correction of mistakes and preservation of service credit across employers and locations. Section 1(3) provides that "It shall come into force on such date as the Central Government may, by notification, appoint."<sup>61</sup> This mode of commencement creates continuity risk during transition because the employees continue to be covered by the old arrangements while the structure of the Code remains only partly activated, thus making portability implementation dependent on the subordinate measures rather than the Code-level standards.

### Portability Hooks in Coss 2020

Portability hooks in the Code are based on the idea of a single registration and database-driven access to welfare for unorganized, gig, and platform workers.<sup>62</sup> It is thus a legally important feature of the design that it envisages portability across States and through migration, which has constitutional relevance in the light of mobility and equality guarantees. However, identity-linked registration also needs to be proportionate and law-backed, especially when Aadhaar or equivalent verification is used as a functional gateway to welfare access. The Puttaswamy judgment on contract-based Aadhaar compulsion strengthens the argument that portability design should not turn identity architecture into a means of exclusionary compulsion.<sup>63</sup>

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<sup>60</sup> P Subba Rao, *Labour Welfare and Social Security* (1st edn, Himalaya Publishing House 2015) 168.

<sup>61</sup> *Code on Social Security 2020* (Act 36 of 2020).

<sup>62</sup> *Ibid.*

<sup>63</sup> *K S Puttaswamy (Aadhaar-5J) v Union of India* (n 46).

## Implementation Status and Rule-Making

Rule-making status is legally at the heart of the matter since platform and gig workers' portability options rely on the schemes, the sources of financing, and the contribution attribution rules that the Code foresees but the Code itself does not operate. A start structure that depends on a notification implies that enforceable rights may be kept in a state of dormancy until they are notified, even if the statute clearly indicates the intention.<sup>64</sup> Gradual enforceability allows for the uneven development of the different parts of the Code, thus, EPFO portal capability may outstrip the Code-era inclusion architecture. Litigation, including monitoring orders, illustrate that courts may regard delay and obscurity as failures of governance when statutory welfare promises exist but are yet to be realized at the operational level.<sup>65</sup>

## Legal Gaps in a Multi-Employer Economy

The main legal deficiencies in portability are primarily related to situations where the type of multi-principal work, identity-linked access controls, and weak time-bound duties are left to administrative discretion and not to the enforceable standards. In a highly dynamic economy, these loopholes inevitably lead to workers bearing the hardships as disruptions in continuity show up as delayed access, fragmented service, or denial of coverage. The uncertainty of cross-border non-compliance adds to this where different High Court decisions leave employers and international workers without uniform compliance standards which, in turn, directly impact the continuity of membership and service history across the jurisdictions.<sup>66</sup>

- Contribution attribution rules for multi-aggregator work remain under-specified in enforceable form<sup>67</sup>
- Identity-linked access controls can exclude workers where mismatch is common<sup>68</sup>
- Statutory timelines for transfers and corrections are not clearly framed as enforceable

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<sup>64</sup> Code on Social Security 2020 (n 61).

<sup>65</sup> *The Indian Federation of App-Based Transport Workers (IFAT) v Union of India* (n 58).

<sup>66</sup> *Spice Jet Limited v Union of India* (n 53).

<sup>67</sup> Suresh Nadagoudar and Rajashree Patil, 'Social Security Code 2020: An Analysis' (2021) 10 *Christ University Law Journal* 19.

<sup>68</sup> Ulka Bhattacharyya and Soumya Jha, 'Understanding Social Security for Gig Workers: Analyzing Recent Developments' (2021) 11 *NLIU Law Review* 61.

duties

- Liability allocation across EPFO, employers, contractors, and platforms remains thin
- Cross-border coverage uncertainty persists under divergent judicial approaches

### Reform Proposals

Reform has to be consistent with the legal obligations that are capable of being fulfilled through automated settlement and simplified transfer workflows, at the same time, rights against exclusion and arbitrary denial should be preserved. The main legal step is to transform the expectations of portability into obligations that are measurable in time, auditable, and with a clear allocation of liability. Standards at the rule-making level can be defined in such a way that they do not disfigure the beneficial nature of social security law, while at the same time, adding the power of enforceability to service-credit integrity and correction mechanisms. Privacy governance should be in accordance with the DPDP Act's limitation on purpose and containment of security where identity and financial data are being processed at scale.<sup>69</sup>

- Statutory timelines for transfers and service-credit updates with mandatory disclosure of delay reasons<sup>70</sup>
- Mandatory error-resolution workflow with escalation and audit trails for exception handling
- Portability audits for high-churn sectors with public indicators on transfer and correction completion
- Contribution splitting logic for multi-aggregator work aligned to multi-platform earning reality
- Privacy-compliant verification alternatives where Aadhaar is unavailable or

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<sup>69</sup> Vidhi Centre for Legal Policy, 'A Model Law for Platform Based Gig Workers' <https://vidhilegalpolicy.in/research/a-model-law-for-platform-based-gig-workers/> accessed 20 February 2026.

<sup>70</sup> PRS Legislative Research, 'Draft Rules Under Code on Social Security, 2020' <https://prsindia.org/billtrack/draft-rules-under-code-on-social-security-2020> accessed 13 February 2026.

mismatched

## Tech Design and Legal Design Alignment

The process simplifications of the EPFO offer a working model to Code-era portability standards: firstly, they are minimizing the reliance on the attestation step; secondly, they are extending the rule-based completion; and thirdly, through bifurcation, they are maintaining the clarity of the tax compliance.<sup>71</sup> Legal design ought to reflect this approach by not only setting transfer and correction enforceable service levels but also by laying out a reasoned-order framework for penalties and damages that influence employer behavior.<sup>72</sup> The system in question, if it is to be the gatekeeper of identity, should also allow for proportionate alternatives that do not run afoul of the constitutional limitations on contract-based coercion, at the same time, DPDP-compliant personal data processing governance should be ensured at scale.<sup>73</sup>

## Conclusion

Portability can be considered as the continuation of the statutory social security experience without interruption even when there are changes of employers, which is facilitated by legal rules as well as system design. The EPFO's implementation of the UAN system and its associated online portal have enhanced the elimination of dependency on attestation and also increased the use of automated, rule-based processing. Nevertheless, the portability issue is still one of the most uncertain aspects of how the scheme operates because its design for coverage, the determination of rights attribution, and the setting of enforceable time limits have not yet been fully developed.<sup>74</sup>

In a labor market with high churn, portability failure are not intermittent anomalies. They are the expected results of disjointed employment, hired labor through intermediaries, and different identities across jurisdictions. UAN-linked rails facilitate the removal of most of the frictions, nevertheless, multi-identifier risk remains if the identity mismatch is considered a hard stop and not a correctable exception. Beneficial legislation, in a legal context, cannot be justified by

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<sup>71</sup> Press Information Bureau, Government of India, 'EPFO Simplifies Transfer Claim Process Through Revamped Form 13 Functionality; More Than 1.25 Crore Members to Benefit; Launches Facility for Bulk Generation of UAN by Employers without Aadhaar Seeding' (n 24).

<sup>72</sup> *Central Board of Trustees v Registrar, Central Government Industrial Tribunal* (n 59).

<sup>73</sup> *K S Puttaswamy (Aadhaar-5J) v Union of India* (n 46).

<sup>74</sup> Shakra Razavi, 'Making the Right to Social Security a Reality for All Workers' (2022) 65 *The Indian Journal of Labour Economics* 269.

merely theoretical eligibility; it needs a manageable continuity at the administration level, with the imposition of duties such that the workers are not left with the procedural burdens due to enforcement failures being shifted to them.<sup>75</sup>

The results speak in favor of three major theses. The first is that significant increases in settlement throughput, automation share, and transfer workflow simplification that can be quantified indicate that the capacity of the system is not the main limiting factor for becoming standard retail processes.<sup>76</sup> The second is that the unresolved issues in the Code on Social Security, 2020 pertaining to legal gaps remain crucial for portability since the Codes consolidation does not in itself result in standards for multi-employer continuity that can be enforced, and the choice of continuation makes the enjoyment of rights dependent on notification and scheme detail.<sup>77</sup> The third is that access controls linked to identity have to be reasonable, based on the law, and have correction channels that avoid exclusion when mismatches are common.<sup>78</sup>

From this set of propositions, a practical agenda can be derived. The rule-making priorities should, among other things, authorize the completion of the transfer within a certain time frame, the disposal of corrections within a certain time frame, the standard of service-credit integrity for pension continuity, and a clear determination of the liabilities between EPFO, employers, contractors, and aggregator's Litigation watchpoints, on the other hand, should concentrate on facets like identity compulsion limits, cross-border membership conflicts, and equity in damages and penalty orders through the duty of reasoned decisions.<sup>79</sup> Objective and quantifiable indicators could be the median time taken for a transfer, the median time for making a correction, the rate of de-duplication, the accuracy in pension service credits, and the proportion of exception cases resolved within stipulated periods.

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<sup>75</sup> Aishwarya Raman, Sreelakshmi Ramachandran and others, 'India's Social Security Code, 2020: A Catalyst for Promoting and Protecting Platform Labour' (2021) 28 *Labour & Development* 1.

<sup>76</sup> Press Information Bureau, Government of India, 'EPFO Enhances Auto-Settlement Limit for Advance Claims to ₹5 Lakhs, Ensuring Faster Access to Funds for Members' (n 22).

<sup>77</sup> *Code on Social Security 2020* (n 61).

<sup>78</sup> *K S Puttaswamy (Aadhaar-5J) v Union of India* (n 46).

<sup>79</sup> *Central Board of Trustees v Registrar, Central Government Industrial Tribunal* (n 59).

## **BIBLIOGRAPHY**

### **Table of cases**

Association of Industries and Institutions v Union of India WP(C) 5952/2021 (Delhi High Court, interim order dated 17 September 2021)

Central Board of Trustees v Registrar, Central Government Industrial Tribunal [2025] 181 taxmann.com 313 (Calcutta High Court)

Food Corporation of India v Provident Fund Commissioner (1990) 1 SCC 68 (Supreme Court of India)

The Indian Federation of App-Based Transport Workers (IFAT) v Union of India WP(C) 1068/2021 (Supreme Court of India, order dated 18 February 2025)

K S Puttaswamy (Aadhaar-5J) v Union of India (2019) 1 SCC 1 (Supreme Court of India)

Regional Provident Fund Commissioner v Hooghly Mills Company Limited (2012) 2 SCC 489 (Supreme Court of India)

RPFC (II), West Bengal v Vivekananda Vidyamandir (2019) 2 SCC 1 (Supreme Court of India)

Spice Jet Limited v Union of India 2025 SCC OnLine Del 8271 (Delhi High Court)

Stone Hill Education Foundation v Union of India 2024 SCC OnLine Kar 425 (Karnataka High Court)

### **Table of legislation**

Code on Social Security 2020 (Act 36 of 2020)

Employees' Provident Funds and Miscellaneous Provisions Act 1952 (Act 19 of 1952)

### **Secondary sources**

Asher MG and Nandy A, 'Reforming Provident and Pension Fund Regulation in India' (2006) 14 Journal of Financial Regulation and Compliance 273

Bhattacharyya U and Jha S, 'Understanding Social Security for Gig Workers: Analyzing Recent Developments' (2021) 11 NLIU Law Review 61

ClearTax, '*EPF Withdrawal Online*' <https://cleartax.in/s/epf-withdrawal-online> accessed 19 February 2026



Mishra A and Kundu P, 'Theories and Practices of Labour Welfare in India: A Comprehensive Analysis' (2025) 5 *International Journal of Law, Justice and Jurisprudence* 215

Nadagoudar S and Patil R, 'Social Security Code 2020: An Analysis' (2021) 10 *Christ University Law Journal* 19

Narasimhan R, Vazhayil JP and others, 'Employees' Provident Fund Organization: Empowering Members by Digital Transformation' (2018) 18 *Journal of Public Affairs* e1844

National Portal of India, '*Employee Provident Fund Member Passbook*' <https://www.india.gov.in/spotlight/employee-provident-fund-member-passbook> accessed 17 February 2026

Nilekani N, *Imagining India: The Idea of a Renewed Nation* (1st edn, Penguin Books India 2008)

— —, Pai TVM and others, *Rebooting India: Realizing a Billion Aspirations* (1st edn, Penguin Random House India 2015)

Press Information Bureau, Government of India, '*EPFO Enhances Auto-Settlement Limit for Advance Claims to ₹5 Lakhs, Ensuring Faster Access to Funds for Members*' <https://www.pib.gov.in/PressReleasePage.aspx?PRID=2139291&reg=3&lang=2> accessed 14 February 2026

— — '*EPFO Simplifies Transfer Claim Process Through Revamped Form 13 Functionality; More Than 1.25 Crore Members to Benefit; Launches Facility for Bulk Generation of UAN by Employers without Aadhaar Seeding*' <https://www.pib.gov.in/PressReleasePage.aspx?PRID=2124244&reg=3&lang=2> accessed 16 February 2026

— — '*EPFO Expands "Ease of Living": Reducing Service Delivery Time for Claim Settlement*' <https://www.pib.gov.in/PressReleasePage.aspx?PRID=2020461&reg=3&lang=2> accessed 18 February 2026

— — '*EPFO Achieves Historic Milestone of Settling Over 5 Crore Claims in FY 2024–25: Dr Mansukh Mandaviya*' <https://www.pib.gov.in/PressReleasePage.aspx?PRID=2100310&reg=3&lang=2> accessed 19 February 2026

PRS Legislative Research, '*Code on Social Security, 2020*' <https://prsindia.org/billtrack/code-on-social-security-2020> accessed 11 February 2026

— — '*Draft Rules Under Code on Social Security, 2020*' <https://prsindia.org/billtrack/draft-rules-under-code-on-social-security-2020> accessed 13 February 2026

Raman A, Ramachandran S and others, 'India's Social Security Code, 2020: A Catalyst for Promoting and Protecting Platform Labour' (2021) 28 Labour & Development 1

Razavi S, 'Making the Right to Social Security a Reality for All Workers' (2022) 65 The Indian Journal of Labour Economics 269

Servais J-M, *International Social Security Law* (4th edn, Kluwer Law International 2022)

Srivastava SC, *Industrial Relations and Labour Laws* (9th edn, Vikas Publishing 2026)

Standing G, *The Precariat: The New Dangerous Class* (1st edn, Bloomsbury Academic 2011)

Subba Rao P, *Labour Welfare and Social Security* (1st edn, Himalaya Publishing House 2015)

Taha N, Siegmann KA and others, 'How Portable Is Social Security for Migrant Workers? A Review of the Literature' (2015) 68 International Social Security Review 95

Vidhi Centre for Legal Policy, '*A Model Law for Platform Based Gig Workers*' <https://vidhilegalpolicy.in/research/a-model-law-for-platform-based-gig-workers/> accessed 20 February 2026