

The First-Time NGO Founder's Compliance Journey — Week by Week, Year by Year

This note is for anyone who has just registered or is planning to register an NGO — trust, society, or Section 8 Company — in Odisha or anywhere in India. It synthesises the compliance journey from the moment of registration through the first three years of operations into a sing...

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A [convergence-notes](#)

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The eight JaBaSu Compliance Primers cover each registration in depth. This convergence note answers a different question: **given where I am today (just registered, or about to register), what do I do first, what do I do next, and what comes after that?**

Read this note first. Then go to the individual Compliance Primers for the detailed how-to on each step.

The Five Compliance Pillars

Before the timeline, understand what you are building. Your NGO's compliance architecture has five pillars — each serving a different purpose:

Pillar	What It Does	Key Registration
Legal existence	Proves your NGO exists and is registered	Trust Deed / Society Certificate / MCA Certificate
Tax identity	Identifies your NGO to the tax system	PAN
Government visibility	Makes you visible for grants, scheme access, CSR	DARPAN ID
Tax exemption	Exempts your income; enables donor tax deductions	RNPO Registration (12A + 80G equivalent under IT Act 2025)
CSR access	Enables receipt of corporate CSR funds	CSR-1

All five must be built — but they must be built in sequence. You cannot apply for RNPO registration without PAN. You cannot apply for CSR-1 without RNPO registration. You cannot apply for FCRA without 3 years of track record. The sequence matters.

Week 1 — Day the Deed / Certificate Is in Hand

The Most Urgent Task: Apply for PAN (Today)

The moment you receive your registered trust deed, society registration certificate, or MCA incorporation certificate — apply for PAN. The same day, if possible.

Where: Online at NSDL (onlineservices.nsdl.com) or UTIITSL (utiitsl.com). Select Form 49A.

Documents:

- Registered Trust Deed / Society Certificate / MCA Certificate (proof of existence)
- Address proof (trust registered office address — the deed itself serves this purpose)
- Aadhaar and PAN of the Managing Trustee / Authorised Signatory

Cost: Rs. 107 (online, Indian address)

Timeline: e-PAN in 48-72 hours; physical PAN card in 7-10 working days

Why it cannot wait: PAN is the prerequisite for Income Tax portal registration, DARPAN, bank account opening, and RNPO application. Every week without PAN is a week of delay on all four.

Week 2 — When PAN Arrives

Three actions happen simultaneously the day PAN arrives — not sequentially.

Action A — Register on the Income Tax e-Filing Portal

Where: incometax.gov.in → Register → Others → Enter Trust/Society/Section 8 PAN

Time: 30 minutes

Why: This creates your NGO's permanent digital identity with the Income Tax Department. You need this to file Form 10A for RNPO registration and to file ITR-7 annually.

Action B — Begin DARPAN Registration

Where: ngodarpan.gov.in → Sign Up

Documents: PAN, Registration Certificate, Aadhaar of 3 key members (for OTP authentication), bank account details (open this first — see Action C), email address and mobile number dedicated to the NGO

Important: You need the bank account details to complete the DARPAN profile. Do Actions A, B, and C in parallel — start DARPAN, open the bank account, and come back to complete DARPAN once you have the account number.

Timeline: 7-15 working days from profile completion

Cost: Free

Action C — Open the Bank Account

Where: SBI, Bank of Baroda, or any scheduled commercial bank — at the branch nearest to your registered office

Documents:

- Registered Trust Deed / Society Certificate (original + certified copy)
- Trust / Society PAN
- Board Resolution authorising account opening, naming bank and branch, designating joint signatories
- Aadhaar and PAN of all signatories
- Passport photographs of all signatories

Board Resolution: This must be prepared before you go to the bank. It should state: (1) the trust/society is opening an account at [bank name, branch name], (2) the account is to be jointly operated by [Managing Trustee name] and [designated second trustee name], (3) both signatures are required for all transactions. Have all trustees sign it.

Timeline: 5-10 working days from document submission

Week 4-6 — File Form 10A for RNPO Registration

Once DARPAN ID is confirmed and bank account is opened — file Form 10A on the Income Tax e-Filing portal for RNPO provisional registration.

Two filings on the same day:

1. Form 10A selecting **Section 332** (RNPO registration — the 12A equivalent)
2. Form 10A selecting **Section 354** (donor tax deduction approval — the 80G equivalent)

Documents to upload:

- Registered Trust Deed / Society Certificate
- Trust PAN
- DARPAN ID (mandatory — the form will not submit without this)
- List of trustees/directors with Aadhaar
- Bank account details
- NIL activity declaration (your NGO has not yet commenced activities)

What happens after submission:

- The system validates your documents

- The Principal Commissioner of Income Tax (Charities) reviews and grants provisional registration
- Provisional RNPO registration is **mandatory within 30 days** — the tax department has no discretion to refuse a new entity that hasn't yet commenced activities

What you receive:

- Form 10AC — the RNPO certificate with a **16-digit Unique Registration Number (URN)**
- This is your RNPO number — quote it on every donation receipt, every grant application, and every CSR-1 form

The timing rule: The earlier you file Form 10A, the earlier provisional RNPO registration begins. For a trust established in May 2026 that files Form 10A in June 2026, RNPO registration is effective from June 2026 — and all donations from June 2026 onwards are tax-exempt for the trust and tax-deductible for donors under Section 354.

Month 3 — First Compliance Rhythms

By Month 3, your foundation is in place: Deed → PAN → DARPAN → Bank Account → RNPO registration. Now establish the operational rhythms that keep you compliant through the years.

Establish Your Accounts System

Open an accounting ledger — whether physical or digital (Tally EVO, Zoho Books free tier, or Excel). Record every transaction: every donation received, every expense paid, every bank debit and credit.

The three books you must maintain:

1. **Cash Book / Payment Register** — all cash receipts and payments
2. **Receipt and Payment Account** — summary of all inflows and outflows for the year
3. **Income and Expenditure Account** — shows whether you surplus or deficit for the year

Without these records, your CA cannot audit your accounts. Without an audit, you cannot file ITR-7. Without ITR-7, RNPO registration can eventually be treated as void.

Open a Minute Book

Every Board meeting, every resolution, every trustee decision must be recorded in a formal minute book. The minute book is evidence of governance — it is examined during RNPO regular registration conversion (Form 10AB), FCRA applications, and CSR due diligence. Start it from Day 1.

Month 6 — Apply for CSR-1? Not Yet. But Plan for It.

The most common mistake new NGO founders make: applying for CSR-1 without meeting the eligibility criteria.

CSR-1 eligibility requires both simultaneously:

1. RNPO registration (Section 332 + Section 354) — ✓ you have this after Month 6
2. **3 years of charitable activities track record** — ✗ you don't have this until Year 4

You will be able to apply for CSR-1 approximately in **2029** (if your trust was registered in 2026). This is not a defect in your NGO — it is the system's way of ensuring that only organisations with demonstrated track records access corporate CSR funds.

What to do instead of waiting: Start documenting your activities from Day 1. Every workshop conducted, every scheme access facilitated, every training given, every beneficiary served — document it with photographs, attendance sheets, GPS coordinates, and outcome records. This documentation IS the 3-year track record. When you apply for CSR-1 in 2029, this is what you submit.

Year 1 — Annual Compliance Cycle Begins

At the end of your first financial year (31 March), your first annual compliance cycle begins. The deadlines:

Deadline	Filing	Where
31 May	Form 10BD (annual donation statement) + Form 114 (donor certificates)	IT e-Filing portal
30 September	CA audit report — Form 10B or 10BB — uploaded by your CA	IT e-Filing portal
31 October	ITR-7 — Annual Income Tax Return (mandatory even if NIL)	IT e-Filing portal
Ongoing	DARPAN profile annual update	ngodarpan.gov.in

If your first financial year income is NIL — you still file ITR-7. A NIL ITR-7 is a valid return. Non-filing is not acceptable.

Appointing a CA

You need a Chartered Accountant for:

- Auditing your accounts (if income exceeds Rs. 2.5 lakh — Form 10BB; if income exceeds Rs. 5 crore or you have any FCRA receipts — Form 10B)
- Uploading the audit report to the IT portal
- Preparing and reviewing your ITR-7

Cost for a new trust with minimal activity: Rs. 8,000-20,000 for first-year audit + ITR-7. Engage your CA in April — not September. Give them complete accounts by June. This gives time for review, audit, and filing well before the 31 October deadline.

Year 3 — Converting Provisional to Regular RNPO Registration

Your provisional RNPO registration (Form 10AC, issued in Month 2) is valid for 3 years. Before it expires, convert to regular registration.

When: At least 6 months before expiry (so if provisional was issued June 2026, apply for regular registration no later than December 2028)

Form: Form 10AB on the IT e-Filing portal

What Form 10AB requires (unlike the simple Form 10A for provisional):

- Audited accounts for all years since inception
- Annual activity reports for all years
- Description of all projects undertaken, beneficiaries served, geographies covered
- Details of all trustees and any changes in trusteeship since inception
- Bank statements
- Evidence that activities are genuine charitable activities in the domain stated in the deed

This is the moment when your 3-year documentation record — the minute book, the activity records, the photographs, the beneficiary registers — becomes your RNPO permanent registration submission. Good documentation = smooth Form 10AB. Poor documentation = PCIT inquiry notice = delays.

Year 3-4 — CSR-1 and FCRA Planning

CSR-1 (from 2029)

Once you have 3 years of documented charitable activities and active RNPO registration:

- File CSR-1 on mca.gov.in (fully web-based since July 2025)
- Include: RNPO certificate, DARPAN ID, PAN, bank account, audited accounts for 3 years
- CSR-1 is auto-processed — typically issued within 2-3 working days of validation
- No government fee

FCRA (from 2029-30)

For organisations wanting to receive international funding — apply for FCRA registration (Form FC-3A on fcraonline.nic.in) when:

- 3 years of operations are complete
- Rs. 15 lakh of charitable expenditure is documented
- CA-audited accounts for 3 years are available

The FCRA wait is worth it: FCRA registration opens international foundations (Gates, Tata Trusts, Azim Premji, Ford Foundation), bilateral aid (USAID through Indian implementing partners), and UN agency sub-grants.

The Complete Sequence — At a Glance

Timeline	Action	Portal / Authority
Day of deed/certificate	Apply for PAN	NSDL / UTIITSL
Day PAN arrives	IT portal registration	incometax.gov.in
Day PAN arrives	Begin DARPAN registration	ngodarpan.gov.in
Day PAN arrives	Begin bank account opening	Branch + Board Resolution
Week 4-6	File Form 10A (RNPO + 80G-equivalent)	IT e-Filing portal
Month 2	Receive Form 10AC (RNPO certificate)	From PCIT/CIT
Month 3	Establish accounts system + minute book	Internal
March 31 (Year 1)	First financial year ends	—
May 31 (Year 1+)	Form 10BD + Form 114 (donor certificates)	IT portal
Sept 30 (Year 1+)	CA audit report uploaded	IT portal (by CA)
Oct 31 (Year 1+)	ITR-7 filed	IT portal
6 months before expiry	Form 10AB (regular RNPO registration)	IT portal
Year 3-4	CSR-1	mca.gov.in
Year 3-4	FCRA (if international funding)	fcraonline.nic.in

The Five Mistakes That Derail New NGOs

1. Not filing ITR-7 in the first year because "there was no income." ITR-7 is mandatory regardless of income. A NIL return is a valid return. Non-filing is a violation under Section 349 of IT Act 2025.

2. Mixing personal and NGO finances. Every rupee that goes through the NGO must go through the NGO's bank account. Personal payments on behalf of the NGO, later reimbursed, must be documented with receipts. Personal loans to the NGO from trustees must be documented as loans — not treated as donations.

3. Missing the DARPAN annual update. DARPAN profiles that are not updated for 2+ years look dormant to funders and government departments that check. Update the annual report on DARPAN every April.

4. Letting RNPO provisional registration expire without converting to regular. File Form 10AB at least 6 months before the provisional registration's 3-year expiry. A lapsed RNPO means donations are no longer tax-exempt and donors lose their Section 354 deduction — the fastest way to lose donor trust.

5. Applying for CSR-1 without the 3-year track record. The MCA system will validate your RNPO registration dates and flag applications from organisations with less than 3 years of activity. Save the CSR-1 application for when you genuinely meet the criteria.

How JaBaSu Helps

JaBaSu Trust itself navigated this exact sequence in 2026 — registered deed → PAN application → DARPAN (OR/2026/1103919) → bank account → Form 10A for RNPO provisional registration. This convergence note is written from lived experience, not theory.

For NGOs in Odisha seeking compliance navigation support, JaBaSu's Compliance service provides:

- Board Resolution drafting for bank account opening
- Form 10A preparation and IT portal navigation support
- DARPAN profile completion assistance
- Annual ITR-7 facilitation and CA referral

Contact: knowledge@jabasu.org | jabasu.org/contact

Last verified: June 2026. IT Act 2025 effective from 1 April 2026 — RNPO registration (Section 332) replaces old 12A/12AB; Section 354 replaces 80G. Form 10A for provisional registration; Form 10AB for regular registration; Form 10AC is the RNPO certificate. CSR-1: fully web-based from July 14, 2025 (MCA21). FCRA: 3-year track record + Rs. 15 lakh charitable expenditure required. All portals: incometax.gov.in, ngodarpan.gov.in, mca.gov.in, fcraonline.nic.in.

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