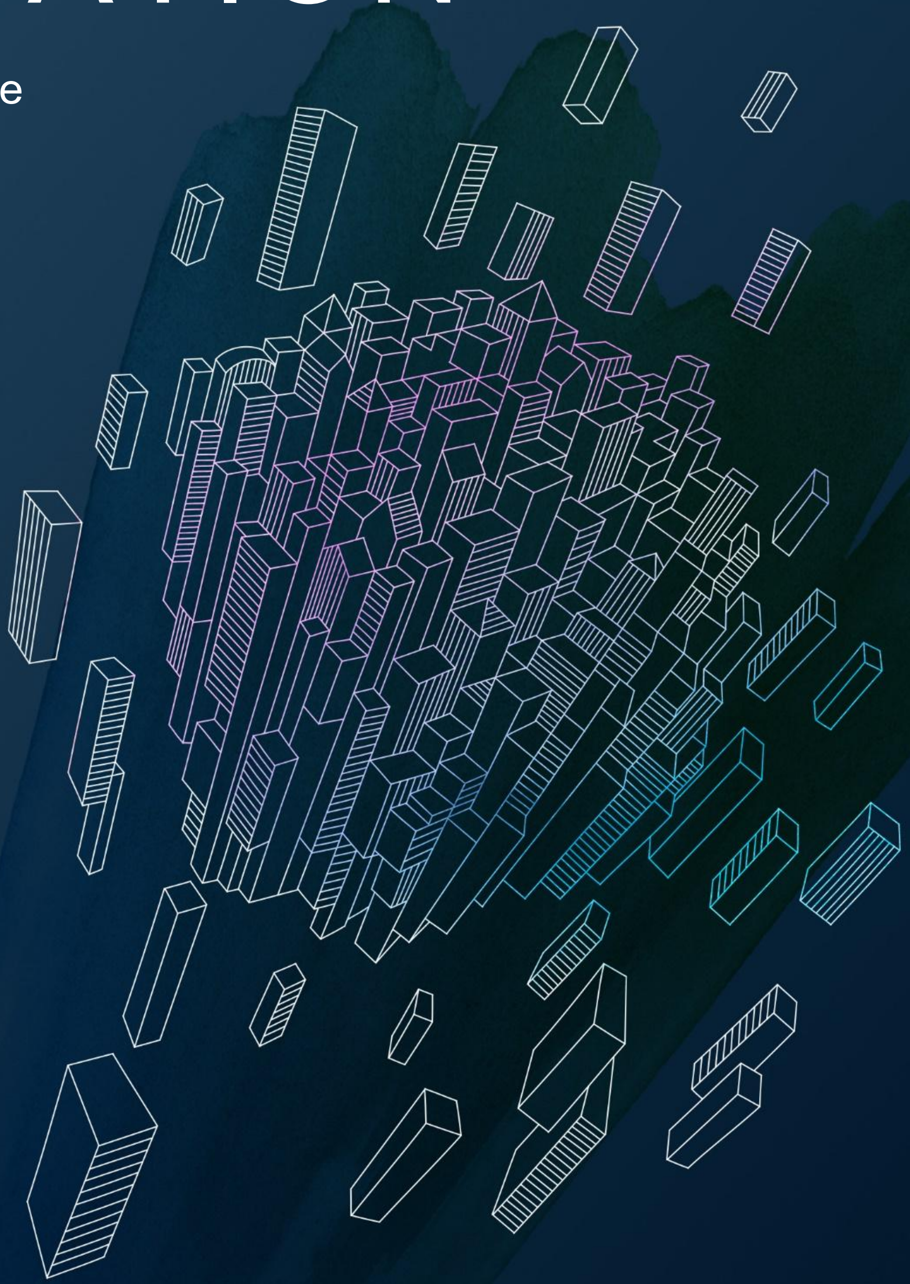
PRIVATE AND CONFIDENTIAL

PRACTICAL GUIDE FOR IDENTITY VERIFICATION

Simplified step-by-step guide



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PRACTICAL GUIDE FOR IDENTITY VERIFICATION

Simplified step-by-step guide for companies and LLPs to comply with the new identity verification (IDV) requirements for directors, people with significant control (PSCs) and LLP members as introduced under the Economic Crime and Corporate Transparency Act 2023 (ECCTA 2023).

STEP 1: UNDERSTAND THE REQUIREMENT

- From **Autumn 2025**, it will be **compulsory** for all **new** directors and PSCs to undergo IDV as part of the **incorporation** process for new companies. **Voluntary** IDV will be possible from **8 April 2025**.
- **Existing** directors and PSCs will need to verify their identity during a 12-month **transition period** starting from Autumn 2025 and which will tie into when the company's next annual **confirmation statement** is filed.
- Identity verification will link a person with a primary identity document e.g. a passport or driving licence
- Once their identity has been verified, Companies House will send the individual a **unique identifier number**. This will be needed for new incorporations and any appointments of new directors, PSCs or members of an LLP.

STEP 2: DECIDE ON THE METHOD OF VERIFICATION: 2 ROUTES AVAILABLE

- **Direct Verification**: Individuals can verify their identity directly through Companies House using a 'standard digital' verification process: **APP** (GOV.UK One Login App) or **WEB BROWSER** (GOV.UK One Login Web Service), or 'assisted digital' verification via a face-to-face meeting at a **POST OFFICE**. The route chosen will be based on the available evidence and convenience.
- **Indirect Verification via an ACSP:** Alternatively, individuals can opt to have an Authorised Corporate Service Provider (**ACSP**) verify their identities. Note AG can provide details of providers who can offer this specific service.

STEP 3: GATHER REQUIRED EVIDENCE

- Ensure all individuals subject to IDV have internet access, a unique email account (i.e. one not previously used for this purpose by another applicant) and are registered users of the Companies House Service.

- Collect evidence required depending on method chosen as follows:

For **DIRECT VERIFICATION:**

- Gather **'required personal information'** e.g., name (including former name), date of birth, current home addresses (and previous home addresses if less than 12 months at the current address).

- Gather **'required evidence'**:

  - **Passport with a biometric chip** (which can be used across all channels) or **passport without a biometric chip** (which can only be used for the web (if UK passport) and face-to-face services – it cannot be used for the app). An expired passport may be used on the web service provided it is no more than 6 months out of date. An expired passport may be used on the face-to-face service provided it is no more than 18 months out of date (and, in the case of non-biometric passports, only for supported countries); **OR**

  - UK photocard **driving licence** (full or provisional) – this is acceptable across all channels. An EU photocard driving licence is only acceptable for the face-to-face service.

  - **Other acceptable evidence**, depending on the channel used, is set out **in the Appendix** (e.g. UK biometric residence permit or card or UK Frontier Worker permit). The app requires UK documents or an in-date non-UK biometric passport. The web service is limited to those with UK documents (including a UK bank account with supporting UK NI number). If the individual does not have any of the UK documents listed in the Appendix, or their non-UK biometric passport has expired, they can use the face-to-face service provided they have one of the other documents listed in the Appendix. If they have none of the listed documents, they must use an ACSP.

- The individual must have **'required contact information'** i.e. an email address.

For **INDIRECT VERIFICATION** via an ACSP:

- The individual must provide the ACSP with their 'required personal information', 'required evidence', and 'required contact information'.

- The **ACSP will explain what evidence they need to see**. This will depend upon whether they carry out checks in person (i.e. by someone trained to a certain standard) or via IDV technology. The list of evidence the ACSP can use to verify identity is **wider** than that required for direct verification. However, if the ACSP does not have software that can validate cryptographic features, additional evidence must be provided.

- Where available, biometric or photographic evidence must be provided that can be assessed for likeness.

- The individual also needs to answer additional questions to support their application

STEP 4: COMPLETE THE VERIFICATION PROCESS

- For the GOV.UK One Login **APP:**
  - The individual must have access to a suitable smartphone with a camera (they will need to submit a photograph of their face); they will need to download the GOV.UK One Login App and follow the provided guidance.
- For the GOV.UK One Login **WEB SERVICE**:
  - The individual must be prepared to answer security questions online e.g. details of loans, credit cards, mortgages etc they may have.
- For the GOV.UK One Login **FACE TO FACE SERVICE**:
  - The individual must use the booking system on GOV.UK One Login website to book an interview. They will need to enter photo ID details and provide a UK home address. They must then visit a Post Office in person with the required evidence.
- For indirect verification, the ACSP will guide the individual through their process, which will align with the regulations.
- An application is considered received once the Registrar has confirmation from the chosen verification channel that the identity check is complete.

STEP 5: MAINTAIN COMPLIANCE

- **ACSPs must keep records** of the verification process and the evidence provided for seven years.
- Be aware that the Registrar will send communications to the individual relating to the IDV process **in electronic form**, (e.g. by email) including the issuing of unique identifiers.
- Ensure ongoing compliance with any new directors or PSCs who join the company and new members of the LLP.
- **Ensure the individual forwards the unique identifier number** they receive directly from Companies House **to any ACSPs** who are authorised to file documents on their behalf e.g. confirmation statements.

WHAT HAPPENS IF A COMPANY, LLP OR INDIVIDUAL DOES NOT COMPLY?

- Non-compliance will result in the Registrar marking the individual as **'not verified'** on the public register.
- Contravention of the IDV requirements by individuals may constitute a **criminal offence**, leading to fines or **civil penalties**.
- Once mandatory IDV is in force, a **company** (and its officers) with unverified directors will also commit an offence and so **risk a fine**. However, the validity of that individual's acts as a director will not be affected.
- Practical implications include the **inability to make statutory filings** without verified identities, register a new company or act as a new director.
- If the Registrar has reasonable cause to believe that the information provided is misleading, false, or deceptive, they will be able to send **re-verification** notices to individuals who have verified their identities.

KEY DEADLINES

1. **8 April 2025:** Voluntary identity verification begins.

2. **Autumn 2025:** Mandatory IDV for incorporation, new directors, and PSCs starts. **Transition period** for existing directors, LLP members and PSCs begins, and will be tied to the confirmation statement filing cycle.

3. **Spring 2026:** Presenters filing documents with the registrar will need to have undergone IDV.

CONCLUSION

Companies and LLPs should **start preparing now** by familiarising themselves with the requirements, deciding on a method of verification, identifying who needs to have their ID verified, and collecting the necessary information and documents. It is crucial to adhere to the timelines to ensure compliance and avoid penalties.

The Appendix

USING THE GOV.UK ONE LOGIN APP	USING THE GOV.UK ONE LOGIN WEB SERVICE	USING THE GOV.UK ONE LOGIN FACE TO FACE SERVICE
Passport with a biometric chip, not expired	UK passport, up to 6 months expired	Passport with a biometric chip, up to 18 months expired
UK photocard driving licence, full or provisional	UK photocard driving licence, full or provisional	Passport without biometric chip, supported countries only, up to 18 months expired
UK biometric residence permit, up to 18 months expired	UK bank account supported by a UK National Insurance Number	UK and EU photocard driving licence, full or provisional
UK biometric residence card		UK biometric residence permit, up to 18 months expired
UK Frontier Worker permit		National identity photocard from an EEA country, standardised chipped biometric cards only