UK Property Accountants

UK Identity Verification



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Chapter 1

The Basics:
What Is Identity Verification?

A statutory requirement linking real individuals to their entries on the UK company register.

A New Legal Obligation

Identity verification at Companies House is a formal statutory obligation introduced under the Economic Crime and Corporate Transparency Act 2023. It requires individuals named on the UK company register as directors, persons with significant control, or in certain other roles to confirm their identity to a specified standard.

The obligation applies to individuals, not to the companies or entities themselves. The register has historically recorded names and addresses, but without any requirement to verify that the person named actually exists and is who they claim to be. This regime changes that.

Verification became a legal requirement on 18 November 2025.

What Identity Verification Is And What It Is Not

Verification is the process of confirming that a named individual is the real person behind a Companies House entry. It links a person's identity such as name, date of birth, address to a secure record held by Companies House, which can then be referenced across every company in which that person holds a relevant role.

This requirement is distinct from the anti-money laundering (AML) or know-your-customer (KYC) checks carried out by accountants, solicitors, and other regulated professionals. Those checks satisfy the compliance obligations of the firm conducting them. Companies House verification satisfies a separate and independent statutory requirement. Completing one does not substitute for the other.

The 12-Month Transition Period

The 18 November 2025 start date is not a single hard deadline by which all individuals must have complied. Rather, it marks the beginning of a 12-month transition period. During this period, those currently in relevant roles are expected to complete verification by the time their specific trigger event occurs, the nature of which depends on their role.

This approach means that compliance deadlines differ between individuals. *Chapter 4* sets out how these event-based triggers work in practice. The appropriate response during the transition period is to act promptly, well in advance of any relevant filing or appointment, rather than to wait until the last possible moment.

Is Verification A One-Time Process?

In most cases, verification needs only to be completed once. Once an individual has verified and received their personal code, that code can be used across all companies in which they hold a relevant role. There is no requirement to re-verify simply because a new directorship or PSC interest is taken on.

Companies House retains the ability to require re-verification in specific circumstances. For example, where concerns arise about the accuracy of existing identity information. Individuals will be notified if re-verification is required and should not attempt to verify again without being directed to do so.



Chapter 2

Why Identity Verification Was Introduced?

The policy rationale: addressing a documented vulnerability in the UK company register.

The Scale Of The Problem

The UK company register is among the most accessible in the world. Incorporation is fast, inexpensive, and available to almost anyone. For the majority of legitimate businesses, this openness is a genuine advantage as it supports entrepreneurship, inward investment, and economic activity.

However, the same openness has been repeatedly exploited. UK companies have been used as vehicles for money laundering, fraud, sanctions evasion, and other forms of economic crime. The relative anonymity of the register, where directors and shareholders could historically be appointed with minimal verification, made it attractive to those seeking to hide assets, obscure beneficial ownership, or impersonate legitimate individuals.

Documented cases have included fictitious directors, stolen identities, and instances where individuals discovered their names had been used to incorporate companies entirely without their knowledge. In some cases, those impersonated individuals were exposed to financial or legal consequences as a result.



The Policy Objectives

Deterrence: Requiring genuine identity confirmation makes it substantially more difficult to use fictitious or borrowed identities to control companies. Those who cannot pass identity checks cannot be named as directors or PSCs in the normal way.

Detection: Identity records can be cross-referenced against law enforcement databases, court orders, and other intelligence sources. This supports both proactive investigation and the pursuit of specific cases.

Accuracy: The public register becomes a more reliable source of information about who actually controls UK companies an outcome that benefits investors, lenders, counterparties, and regulatory bodies alike.

Transparency: Individuals running UK companies, including overseas nationals with UK entities, are now identifiable in a way that was not previously the case. This supports broader international efforts to improve corporate transparency standards.

The Benefit To Legitimate Businesses

For entities operating lawfully, identity verification is not merely a compliance cost. Companies whose officers are fully verified carry a stronger assurance signal for those engaging with them commercially whether in securing lending, attracting investment, or satisfying the due diligence requirements of professional counterparties.

This is particularly relevant for property investors and landlords using corporate or LLP structures. Lenders, solicitors, and managing agents are increasingly scrutinising Companies House compliance as part of their own obligations. A company with unverified officers may face practical friction in transactions where counterparty due diligence is required.

Chapter 3

Who Exactly Needs to Verify Their Identity?

Verification applies to individuals, not to corporate entities. This chapter sets out who is currently in scope and what is being phased in later.

Individuals Currently In Scope

The following categories of individual are required to verify their identity under the rules as currently in force.

Role	Currently in scope?	Notes
Director (UK company)	Yes	All directors, executive or non-executive
LLP member / managing officer	Yes	Director-equivalent roles
Director of overseas company with UK establishment	Yes	Nationality irrelevant
Person with Significant Control (PSC)	Yes	Individuals only
ACSP applicant	Yes	Must verify before registration
Company secretary / filer	No	Later phase
Corporate directors / corporate PSCs	No	Later phase

Directors of UK-registered companies

Any individual appointed as a director of a UK company whether executive or non-executive and recorded as such at Companies House, is required to verify. The obligation exists regardless of how active the directorship is in practice

Equivalent officers

Certain roles carry director-equivalent obligations at Companies House. These include members of limited liability partnerships (LLPs) and managing officers of other registered entities. Where a role carries director-level responsibilities on the register, the verification requirement applies in the same way.

Directors of overseas companies with UK establishments

Where an overseas-incorporated company has registered a UK establishment with Companies House, the directors of that overseas company are required to verify. The nationality or country of residence of the individuals concerned does not create an exemption.

People with Significant Control (PSCs)

A PSC is broadly defined as an individual who holds more than 25% of a company's shares or voting rights, or who has the right to appoint or remove the majority of the board, or who otherwise exercises significant influence or control. Every individual registered as a PSC at Companies House must verify.

Where an individual holds both a directorship and PSC status in the same company, they must link their single verified identity to both roles independently through the respective filing services.

Authorised Corporate Service Providers (ACSPs).

An ACSP is a professional such as an accountant, solicitor, or company formation agent registered with Companies House to carry out identity verification on behalf of clients. Any individual applying to register as an ACSP must first verify their own identity as part of that application.

Company secretaries and filers

Individuals who file documents at Companies House on behalf of companies, including company secretaries, will be brought within the verification regime. This group is part of a later phase and is not currently required to verify under the rules in force.

Corporate entities are not in scope

Corporate entities including corporate directors, corporate PSCs, and corporate members of LLPs cannot verify their identity under this regime. Identity verification applies only to individuals. Where corporate entities hold roles on the register, those roles are subject to a separate and later phase of the requirements.

Roles in future phases

The following categories will be brought into scope at a later stage. No specific dates have been confirmed by the government:

- Individuals who file documents at Companies House on behalf of clients (other than registered ACSPs)
- Limited partnerships
- Corporate directors of companies
- Corporate members of LLPs
- Officers of corporate PSCs

These categories are not subject to the current requirements. Developments should be monitored as the regime is extended.



Chapter 4

When Is the Deadline to Act?

There is no single universal deadline. Obligations are triggered by specific events connected to each individual's role.

Event-Based Obligations

A defining feature of this regime is that compliance deadlines are not fixed to a single calendar date. Instead, each individual's obligation is activated by an event, something that happens in connection with their role at Companies House, such as the filing of a confirmation statement or the anniversary of a UK establishment's registration.

Understanding which event applies is therefore essential for determining when action must be taken. The trigger points for each main category of person in scope are set out below.

Who you are	What triggers your deadline
Existing director	Company's next confirmation statement
Newly appointed director	Point of appointment filing
Director of new company	Incorporation filing
Director of overseas company with UK establishment	Anniversary of UK establishment registration date
PSC who is also a director of the same company	14 days after the confirmation statement date
PSC who is not a director of the same company	First 14 days of your birth month, annually
Newly registered PSC (after 18 Nov 2025)	At registration, or within 14 days of being added

Existing Directors

For individuals who are already directors of UK companies, the trigger is the company's confirmation statement. The confirmation statement is an annual filing that confirms the accuracy of information held by Companies House. All companies are required to file it.

From the point at which the regime is fully in effect, a company will be unable to complete its confirmation statement unless **all directors have verified their identity** and provided their personal codes. This means verification must be completed before the filing date. Directors of companies with confirmation statements falling due in the near term should complete verification without delay.

Directors holding roles across multiple companies must provide their personal code in each company's confirmation statement. The same code is used each time, but it must be submitted as part of each individual filing.

Newly Appointed Directors

An individual being appointed as a director to an existing company after 18 November 2025 will be required to provide their personal code at the point the appointment is filed with Companies House. Where a new company is being incorporated, the personal codes of all proposed directors must be included in the incorporation filing.

In practice, this means any individual taking on a new directorship should complete verification before the appointment is submitted. Proceeding without having done so will create a compliance issue from the outset of the appointment.

Overseas Companies With UK Establishments

Where an overseas company has registered a UK establishment, all directors of that company must have verified by the anniversary of the UK establishment's registration date. This requirement to confirm that all directors are verified recurs annually by the anniversary of the UK establishment's registration date. However, the identity verification process itself remains a one-off requirement for each individual.

People with Significant Control (PSCs)

PSC verification timelines operate differently from those for directors, and the applicable window depends on the specific circumstances of each individual.

Where an individual is both a director and a PSC of the same company

Both roles carry independent verification obligations. The director obligation is satisfied through the confirmation statement. The PSC obligation is satisfied through the dedicated PSC verification service on GOV.UK and must be completed within a 14-day window that begins the day after the confirmation statement date.

If a company files its confirmation statement ahead of schedule, this does not alter the start of the PSC's 14-day window. However, it still begins on the day after the confirmation statement date, regardless of when the filing was actually submitted.

Where an individual is a PSC but not a director of the same company

The 14-day verification window falls within the first 14 days of the individual's birth month each year. For example, an individual born on the 22nd of April would have a window running from 1 April to 14 April annually. This schedule operates independently of any company filing cycle.

Where an individual is a PSC but not a director of the same company

The 14-day verification window falls within the first 14 days of the individual's birth month each year. For example, an individual born on the 22nd of April would have a window running from 1 April to 14 April annually. This schedule operates independently of any company filing cycle.

Individuals who became PSCs after 18 November 2025

Newly registered PSCs may provide their personal code either when first added to the Companies House register, or within 14 days of being added. This flexibility exists only at the point of initial registration and it does not extend the ongoing annual obligation.

Identifying the relevant trigger date

A company's confirmation statement date is displayed on the Companies House public register, accessible at gov.uk/get-information-about-a-company. For PSCs, the applicable verification window is also indicated on the relevant register entry. Checking these records directly is the most reliable way to establish the applicable deadline.

Chapter 5

How to Verify Identity: **Choosing a Route**

Companies House recognises two official verification routes. Only these routes satisfy the legal requirement.

	GOV.UK One Login	Notes
Cost	Free	All directors, executive or non-executive
Who does the check	You, digitally	Director-equivalent roles
Where	Online / Post Office	Nationality irrelevant
Best for	UK-based individuals with standard photo ID	Individuals only
Accepted documents	Biometric passport, UK photocard licence, BRP, BRC, FWP	Must verify before registration
Legal outcome	Identical — both satisfy the statutory requirement	



Route 1: GOV.UK One Login

The primary verification route is through GOV.UK One Login, the government's central digital identity platform. This service is free of charge. Once accessed, it guides the user through a short assessment to determine the most suitable verification method based on their circumstances.

Verification via the GOV.UK One Login app



A biometric passport from any country



A UK photocard driving licence (full or provisional)



A UK biometric residence card (BRC)



A UK biometric residence permit (BRP)



A UK Frontier Worker permit (FWP)

A compatible smartphone with a working camera is also required. Verification via the app requires a compatible smartphone; users should check the latest technical requirements on the GOV.UK ID Checking App's download page for specific device and software compatibility. The app will scan the identity document and complete the verification check.

In addition to photo ID, the process requires the individual's current address and the year they moved to that address.

Verification via the GOV.UK One Login app

Where app-based verification is not possible, GOV.UK One Login may offer a security questions route. This method draws on financial data to confirm identity such as details held in connection with bank accounts, credit cards, mortgages, or loans and may also require entry of details from a UK passport or driving licence.

This route does not require a smartphone camera and may be more accessible for individuals without compatible devices. Eligibility for the security questions route is assessed automatically by the service though not all individuals will qualify.

In-person verification at a Post Office

Where neither digital route is available, GOV.UK One Login may direct the individual to complete verification in person at a participating Post Office branch. The process requires the individual to enter their photo ID details on GOV.UK One Login first, before attending the Post Office. The branch will then scan the identity document and take a photograph. A result is typically provided within one working day.

It is not possible to attend a Post Office for this purpose without first completing the preliminary GOV.UK stage. The Post Office accepts a wider range of documents than the app route, including non-UK passports, EU photocard driving licences, and national identity photocards from EU and EEA countries.

One email address per verified identity

A verified identity is linked to a specific GOV.UK One Login account, and each email address may only be used for one identity verification. Where multiple individuals share an email address for other GOV.UK services, each will need to create a separate GOV.UK One Login using a distinct email address before verification can proceed.

Where accepted photo ID is not available

Where none of the accepted photo identification documents are held, GOV.UK One Login will assess whether alternative verification is possible. For example, using bank or building society account details combined with a National Insurance number. The service conducts this assessment automatically. If none of the digital routes are available, the Post Office option may still apply.



Route 2: Authorised Corporate Service Providers (ACSPs)

The second official route is verification carried out by an Authorised Corporate Service Provider (ACSP), also referred to as a Companies House authorised agent. Under this route, a registered professional conducts the verification process on behalf of the individual, using identity documents provided to them directly. The individual does not interact with any government portal as part of this process.

To hold ACSP status, a firm must be supervised by a recognised UK anti-money laundering supervisory body and registered directly with Companies House. This registration is distinct from general AML supervision. A professional who conducts know-your-customer checks for other purposes but has not registered with Companies House as an ACSP cannot fulfil this specific obligation on a client's behalf.



Note: AML or know-your-customer checks carried out by a professional adviser for other regulatory purposes do not satisfy the Companies House identity verification requirement, even where the same documents are used. The ACSP process follows a distinct and more prescriptive standard.

How the ACSP process works

The ACSP will request identity documents from an approved list, carry out the required checks, and record the outcome. The verified identity is then connected to the individual's Companies House personal code. Once complete, the verification requirement is satisfied in the same way as if the individual had used the GOV.UK One Login route.

Fees

Unlike the GOV.UK One Login route, ACSPs may charge a fee for their services. Fees will vary between providers. Where an existing professional relationship exists with an accountant, solicitor, or company formation agent, it is worth confirming whether that firm holds ACSP registration. A list of registered ACSPs is published on GOV.UK.

When the ACSP route may be preferable

For most UK-based individuals with standard photo ID, the GOV.UK One Login route is likely to be the most straightforward option. However, the ACSP route may be more appropriate in several circumstances:

1. The individual is based outside the UK or does not hold a document accepted by the digital service
2. The individual holds multiple roles across several companies and prefers the process to be managed consistently within an existing professional relationship
3. The individual's circumstances are complex and professional support throughout the process is preferable

Both routes carry identical legal standing and are equally recognised by Companies House.



Chapter 6

What Happens After the Process Is Complete?

Successful verification creates a formal record and triggers the next step: linking that record to the relevant roles on the register.

STEP 1 – VERIFY YOUR IDENTITY

Choose your route:

- GOV.UK One Login (free)
- Authorised Corporate Service Provider (ACSP)

Results : You received your 14-character Companies House Personal Code

STEP 2 – LINK YOUR CODE TO YOUR ROLES

Directors	:	Submit code in confirmation statement filing
PSCs	:	Submit code via dedicated GOV.UK PSC Verification service
Both roles	:	Do both, seperately

Legal obligation complete

Confirmation of verification

Upon successful completion of identity verification whether through GOV.UK One Login or an ACSP, the individual is issued with a Companies House personal code. This is a unique 14-character alphanumeric identifier that serves as the reference linking the verified identity to the Companies House system.

The personal code is personal to the individual and is not connected to any specific company. *Chapter 7* addresses the code in detail.

The requirement to link verified identity to roles

Verification alone does not fulfil the full legal requirement. Each individual must also actively use their personal code to connect their verified identity to the relevant entries on the Companies House register. The same code applies across every company where the individual holds a relevant role, but it must be submitted separately for each. It does not propagate automatically upon verification. For directors, this is done through the confirmation statement. For PSCs, it is done through a dedicated service on GOV.UK.

This two-step structure verification followed by linking is a common area of misunderstanding. An individual who has verified but not subsequently linked their code to their registered roles has not yet completed their compliance obligation. Both steps are required, and each must be completed within the applicable timeframe.

Impact on confirmation statements

Once the transitional arrangements are fully in effect, a confirmation statement cannot be filed unless the personal codes of all directors have been provided. Where a single director has not completed the process, the company as a whole will be unable to submit its annual filing. This interdependency makes it important for companies with multiple directors to ensure that all individuals in scope are aware of the requirement and are progressing through it.

Data storage and privacy

Identity information verified through GOV.UK One Login is stored and processed in accordance with the GOV.UK One Login privacy notice. Companies House does not retain copies of identity documents. The verification process confirms identity to the required standard without ongoing retention of document images.

Where verification is carried out through an ACSP, the professional handling the documents is responsible for managing that information in accordance with their own data protection and AML obligations. The agent is also required by law to retain copies of the identity documents used and records of the verification checks for a period of seven years from the date the verification was completed. This applies regardless of whether the verification attempt was successful.

Chapter 7

What Is a Personal Code and How Is It Used?

The personal code is a unique individual identifier issued upon verification. It is the mechanism by which a verified identity is connected to roles held at Companies House.

Nature of the code

A Companies House personal code is a 14-character alphanumeric identifier issued to each individual upon successful completion of identity verification. It is personal to the individual not to any company, directorship, or PSC role. The code is not a company number, a Unique Taxpayer Reference, or any other business identifier. It is an individual credential.

The same code applies across every company where the individual holds a relevant role.

When the code must be provided

Confirmation statements

Directors must provide their personal code when their company files its confirmation statement. All directors of the company must have submitted their codes for the statement to be completed. This applies each year at every confirmation statement filing.

Director appointments and incorporations

Where an individual is being appointed as a director to an existing company, the personal code must be included in the appointment filing. Where a new company is being incorporated, the codes for all proposed directors must form part of the incorporation application.

PSC status

Individuals registered as PSCs must provide their personal code through the dedicated PSC verification service on GOV.UK. This must be completed within the 14-day window applicable to their circumstances, as described in *Chapter 4.* Where an individual holds PSC status in more than one company, the code must be submitted for each PSC entry separately.

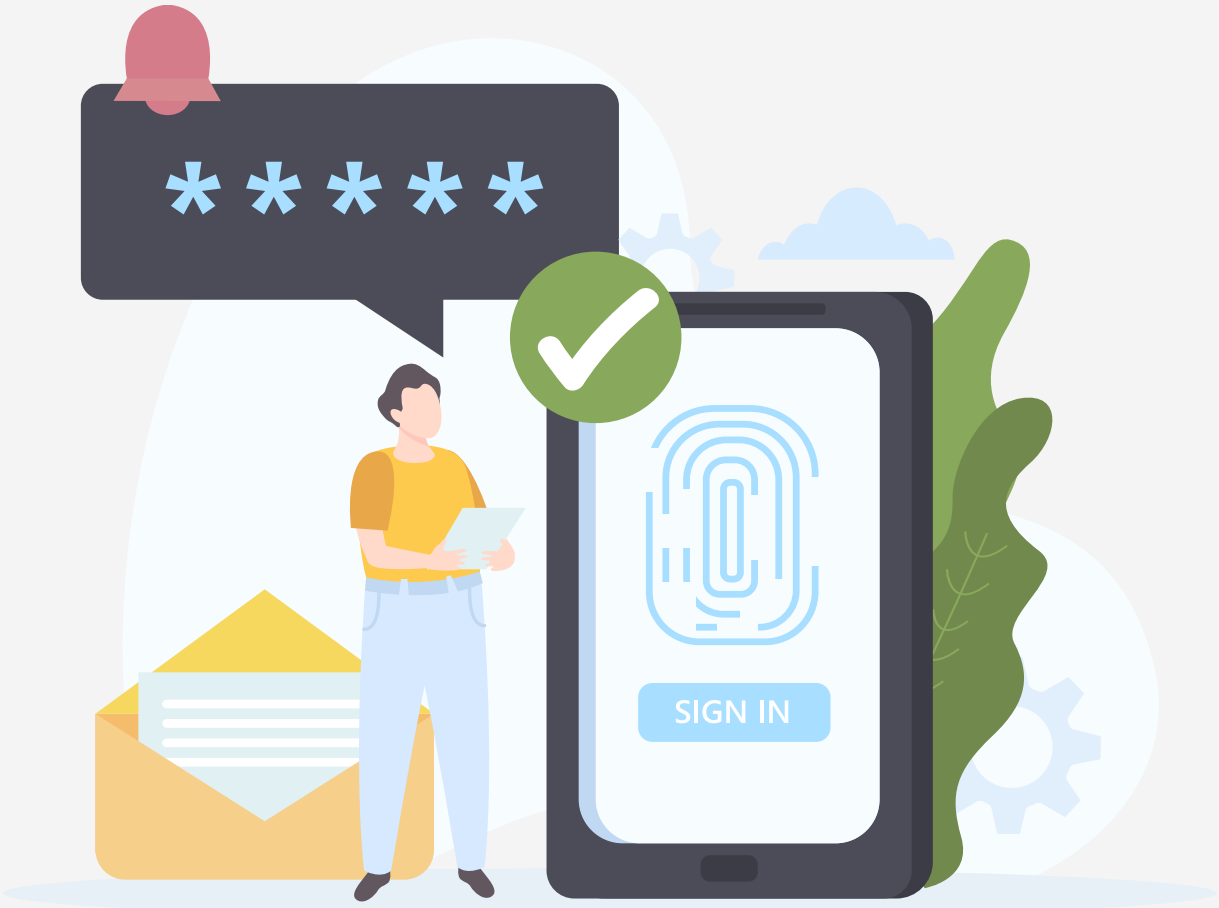
Confidentiality and security

The personal code is a sensitive identifier and should be treated accordingly. Companies House recommends treating it with the same level of care as a Unique Taxpayer Reference (UTR) or similar personal credential. It should be stored securely and shared only with those who have a legitimate and specific need for it. For example to a professional adviser or company secretary who is responsible for filing on the individual's behalf.

The personal code should never be provided in response to unsolicited requests or shared with parties whose role in connection with the relevant companies is unclear. While identity verification makes impersonation considerably more difficult, the security of the personal code itself remains part of maintaining the integrity of the system.

Retrieving a lost or forgotten code

A personal code can be retrieved through the GOV.UK One Login account to which it was originally issued. Where verification was carried out through an ACSP, the agent will hold a record. Re-verification is not required in order to retrieve the code.



Chapter 8

What Are the Penalties for Not Verifying?

Non-compliance carries formal consequences, ranging from operational restrictions to potential legal proceedings. These are set out here factually and without embellishment.

The statutory nature of the obligation

Identity verification is a requirement of statute, introduced under the Economic Crime and Corporate Transparency Act 2023. Failure to comply within the applicable timeframes constitutes a breach of that obligation and may amount to a criminal offence. Companies House has stated publicly that it intends to use the full range of its enforcement powers to achieve compliance.

Criminal prosecution and financial penalties

Where an individual fails to comply with the identity verification requirements on time, they may be committing an offence under the relevant provisions of the Act. This can lead to prosecution through the courts, and upon conviction, a fine. The offence may apply both to the individual who has not verified and, in certain circumstances, to the company and its other officers.

In addition to criminal proceedings, Companies House has administrative powers to impose financial penalties. Enforcement action does not necessarily require a criminal conviction. However penalties can be issued through a civil route independently of any prosecution.

Annotations on the public register

Companies House intends to publish a note on the public register against the entries of individuals who have not complied with verification requirements. This annotation will be visible to any person searching the register including lenders, investors, solicitors, managing agents, and regulatory bodies.

For individuals involved in property, finance, or other regulated sectors, a non-compliance annotation carries practical risks beyond the formal penalty itself. It may affect the confidence of commercial counterparties, complicate transactions where due diligence is expected, and attract additional scrutiny from regulated professionals conducting AML checks.

Operational restrictions

Once the full enforcement regime is operational, individuals who have not complied will be subject to the following restrictions:

- Inability to be appointed as a new director to any existing UK company
- Inability to incorporate a new company or other entity
- Inability to register as an Authorised Corporate Service Provider (ACSP)

Impact on confirmation statement filings

As noted above, a company cannot file its confirmation statement until all directors have provided their personal codes. This makes a single non-compliant director a company-wide filing problem. Failure to file a confirmation statement is itself a compliance breach, capable of attracting further penalties for the company and all of its officers.

Consequences for PSC non-compliance

An individual who continues to hold PSC status beyond their applicable deadline without having verified may be committing an offence. Companies House has indicated it will take action in such cases. Individuals in this position should seek professional advice on their specific circumstances without delay.

Context and proportionality

The penalties described above are directed primarily at those who refuse to comply or persistently fail to engage with the process. For individuals acting in good faith completing verification within the applicable timeframe and providing their personal code in the appropriate filing, the regime creates no particular difficulty.

The purpose of enforcement is to address genuine economic crime risk, not to create obstacles for law-abiding individuals and businesses. The verification process has been designed to accommodate a range of circumstances, and alternative routes exist where standard digital verification is not straightforward.

Closing Summary

The introduction of mandatory identity verification at Companies addresses a well-documented vulnerability in the existing system and aligns the UK with international standards for corporate transparency.

For the great majority of directors, PSCs, and others in scope, the practical steps involved are manageable. Verification takes place once, through a free digital service or a registered ACSP. The resulting personal code is then used to connect that verified identity to the relevant entries on the register a process that is incorporated into existing filing workflows.

At A Glance: What You Need To Know

- Verification applies to individuals, not to companies or other corporate entities.
- Compliance deadlines are event-based, not fixed to a single universal date.
- Verification alone is not enough. The personal code must also be actively submitted to Companies House to complete the legal obligation.
- Non-compliance carries formal consequences, including the potential for prosecution, financial penalties, and operational restrictions.

The purpose of the regime is to ensure that the individuals named on the Companies House register are real, identifiable, and accountable. **Need help verifying or unsure where to start?** UK Property Accountants is registered with Companies House as an Authorised Corporate Service Provider. We can verify your identity on your behalf and manage the filing requirements across all your Companies House roles including for clients based outside the UK.

UK Property Accountants

Let's Talk

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