

# Identity Verification FAQs for English companies and LLPs

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The Economic Crime and Corporate Transparency Act 2023 (ECCTA) introduces a wide range of reforms which are coming into force in stages. If you are an English company or limited liability partnership (LLP), or you manage one, then there are important changes which will require action from you.

The most significant of the company law changes introduced by the ECCTA relate to identity verification (IDV).

## Key dates

- From 18 November 2025, all directors and PSCs of UK companies and all members and PSCs of UK LLPs who are individuals will need to have their identity verified.
- From Spring 2026, anyone filing documents at Companies House on their own behalf, or on the behalf of the company they are employed by, will need to have their identity verified.

## Key points

- Identity verification requirements (IDV requirements) will apply to new and existing directors, LLP members and PSCs (see further details below of others that it will apply to).
- For existing directors, members and PSCs who are individuals, companies and LLPs will need to confirm that all relevant individuals have had their identity verified on the first confirmation statement filed after 18 November 2025.

This note covers the key facts on IDV requirements including more detail on who will need to have their identity verified, timing and how identity is verified.

**Please get in touch if you would like to discuss the identity verification reforms and how they apply to you.**



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## Who will be affected?

Who will need to have their identity verified?

- **Directors of UK companies**
- **Persons with significant control (PSC)**
- **Members of LLPs**
- **People who makes filings with Companies House**
- **Authorised Corporate Service Providers**
- **General partners of a UK registered limited partnership (LP)**

Where a director is a corporate director, or where a PSC is a relevant legal entity (RLE), a director or officer of the corporate director or RLE, as relevant, will need to have their identity verified. In respect of corporate members of LLPs, a director or officer of that corporate member will need to have their identity verified.

### What is an Authorised Corporate Service Provider (ACSP)?

An ACSP (sometimes referred to as an authorised agent by Companies House) is a new role introduced as part of the ECCTA reforms. To register as an ACSP, an agent must be registered with an Anti-Money Laundering (AML) supervisory body. It will include, for example, professional service providers (like accountants and solicitors) and trust and company service providers (like company formation agents).

An ACSP will have two roles:

- firstly, carrying out identity verification (in accordance with the requirements set by regulations and guidance issued by Companies House); and
- secondly, filing documents on behalf of third parties (clients) with Companies House.

We note that not all ACSPs will be carrying out identity verification and some will only register as an ACSP so that they can continue to file documents on behalf of clients.

Simmons & Simmons will not offer an identity verification service as we do not have the appropriate technology or employees with the relevant training.

## When do the requirements come into force?

### > For directors and PSCs of companies

From 8 April 2025, any individual has been able to voluntarily verify their identity.

From 18 November 2025, identity verification will become compulsory for individuals who are directors and PSCs of companies incorporated from that date. There will be a 12-month transition period from 18 November 2025 for existing companies who will be required to confirm that their directors and PSCs have had their identities verified as part of the confirmation statement process. The confirmation statement will include the director's Personal Code (see below) and is separate from the additional requirement that a director who is also a PSC may have (see below). This means that some existing companies will have a short window to comply with IDV requirements (e.g. if their annual confirmation statement is due to be filed shortly after 18 November 2025) whereas some companies will have a much longer period to comply (e.g. where the next annual confirmation statement is not due to be filed until summer 2026).

IDV will be introduced at a later stage for corporate directors of companies and officers of RLEs.

### > For PSCs who are individuals

- for existing PSCs who are also directors of the company on 18 November 2025, the PSC has 14 days from the company's confirmation statement date to submit a statement to Companies House confirming that they have verified their identity, along with their Companies House Personal Code (see below). This is separate from the requirement to verify their identity as a director which will be done through the confirmation statement
- for existing PSCs who are not directors of the company on 18 November 2025, the PSC must provide their statement and Personal Code within 14 days of the first day of the individual's birth month
- for new PSCs after 18 November 2025, the PSC has 14 days from the date of their registration with Companies House to provide their statement and Personal Code.

We suggest verifying the identity of your directors and PSCs voluntarily before 18 November to avoid any possible rush once IDV becomes mandatory.

### > For members and PSCs of LLPs

IDV will be mandatory for all individuals who are members or PSCs of LLPs from 18 November 2025 and will be introduced at a later stage for corporate members of LLPs.

### > For ACSPs

IDV requirements for ACSPs have been in force since 8 April 2025. A person (natural or legal) cannot register as an ACSP unless the identity of someone occupying a senior role has been verified (e.g. a director for companies or member for LLPs).

### > For those filing documents at Companies House

The Companies House transition plan as at the date of this briefing (Transition Plan) indicates that identity verification requirements for those filing documents on their own behalf or on behalf of a company they work for will be introduced in Spring 2026.

### > For general partners of LPs

Reforms to LPs (including IDV requirements) will take place no sooner than Spring 2026 (according to the Transition Plan).

## How is identify verified?

There are two methods of identity verification:



### Direct verification by the Registrar

There are three routes for verification by the Registrar:

1. **GOV.UK ID Check App:** applicants will need to download the ID Check App (an application for proving identity where an individual signs into a government service with their GOV.UK One Login) and will need a suitable smart phone with a working camera.
2. **GOV.UK Web Service:** applicants will need to log on to the government website using their GOV.UK One Login.
3. **GOV.UK Face to Face service at a Post Office:** applicants will need to be able to attend a Post Office in person.

Companies House [guidance](#) provides further detail on the above.

For each application route, applicants will need to provide the “required information” which includes an email address, full name (and former names), date of birth and home address and submit one piece of evidence in line with Table 1 in the Schedule.

Following receipt of an application, the Registrar must determine the application “as soon as reasonably practicable” and notify the individual of the outcome.



### Verification by an ACSP

Where an ACSP is verifying identity, an individual must provide the ACSP with certain specified identity evidence and the ACSP must be satisfied that the required personal information is true.

The evidence required depends on the technology the ACSP has.

If the ACSP has the appropriate technology to validate cryptographic features, the ACSP will require one piece of evidence from Table B in the Schedule (see page 8).

If the ACSP does not have the appropriate technology (and/or the individual does not have the appropriate biometric evidence) then the identity evidence specified in Table C will be required (see page 9).

An ACSP must check that the person whose identity they are verifying physically matches the photo on their identity evidence. [Guidance](#) confirms that this can be done remotely (i.e. via video call.)

After an ACSP has verified an individual’s identity, it must deliver a verification statement to the Registrar.

Following receipt of this, the Registrar will notify the individual of the Personal Code allocated to them (see next page).

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### 1 What confirmation is given to show that an individual's identity has been verified?

Whichever method is used, once the identity verification process successfully completes, an individual will be issued with a unique identifier number (also known as a Personal Code) by Companies House. This will not be publicly available. The Personal Code must be provided to Companies House separately for each role although the process of obtaining the Code only needs to be undertaken once and the same Code will be provided each time.

### 2 How will we know if an individual's identity is verified?

Companies House [guidance](#) confirms that where an ACSP verifies an individual's identity and then notifies Companies House, the Companies House public register will show their identity verification statement, which will include the:

- person's name
- ACSP name
- names of the AML supervisory bodies the ACSP is registered with
- date the ACSP completed the identity checks.

Companies House has not published any guidance to confirm what information will be displayed on the public register when an individual verifies their identity directly via the Registrar (but we understand that it should be possible to confirm from the public register if a person's identity has been verified).

### 3 How frequently will an individual's identity need to be verified?

Identity verification is intended to be a 'one off' event – generally speaking, once an individual has had their identity verified, they will not need to do it again. As above, individuals are issued with a Personal Code when their identity is first verified. This Personal Code can then be provided in future to confirm that their identity has been verified, e.g. in respect of any new director appointments.



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Companies House has the power to serve a re-verification notice on individuals but only if it has reasonable cause to believe that any information supplied as part of the initial identity verification process was false or misleading.

### 4 Will an individual's identity need to be re-verified if they change their name?

There has been some confusion on this point, but our understanding is that if an individual changes their name or any other personal details, they will be able to notify Companies House of the change and the same Personal Code issued to them when their identity was verified originally will continue to apply (meaning they will not need to re-verify their identity). It is not yet clear how the changes will be notified to Companies House but we expect that this will be clarified by Companies House as further guidance and secondary legislation are published.

### 5 What requirements are being introduced when filing documents?

Any individual delivering documents on their own behalf to Companies House must have their identity verified.

An individual may only deliver documents on behalf of another person if:

- they are an ACSP
- they are an employee or officer of an ACSP, or
- they are an individual whose identity has been verified and they are an employee or officer of the person they are delivering documents on behalf of.

As noted above, it is expected that these changes will come into effect in Spring 2026.

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### 6 How can company secretarial teams of large groups continue to file documents on behalf of group entities?

Based on the current wording of the legislation, an employee may only file documents on behalf of the legal entity that employs them (rather than, for example, for subsidiaries or corporate entities that are part of the same corporate group as their employer). This would create significant difficulties for large groups where company secretarial teams file documents on behalf of a large number of group entities.

In a response to a question asked on a Companies House [blog post](#) on this topic, a representative of Companies House stated:

*“We aware of the potential problems the current legislation could cause to businesses who have structures where filings are made by someone who is not an employee of the company, such as a company secretary within group structures.*

*We understand these concerns, and we're working to make regulations to make sure these instances are accounted for. We do not yet have a draft of what the regulations may contain, but we'll make sure that sufficient time is given to prepare in advance of new filing requirements being implemented in spring 2026.”*

There has been no further official information published on this but we would hope that the point will be addressed in secondary legislation and/or guidance.

### 7 Will IDV requirements apply to UK establishments of overseas companies?

Yes, regulations have been published to extend IDV requirements to directors of overseas companies with UK establishments. The regulations will come into effect on 18 November 2025.



## Schedule

**TABLE A**

Identity evidence required if verifying identity directly via the Registrar:

ID Check App	Web Service	Face to face
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 a biometric chip, 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

**TABLE B**

Identity evidence required if verifying identity via the ACSP route and the ACSP has the appropriate technology to validate cryptographic features:

Identity evidence
Biometric or machine-readable passport or Irish passport card, up to 6 months expired
UK, Channel Islands, Isle of Man and EU photocard driving licence full or provisional
EU or EEA identity card, with biometric information
UK biometric residence permit, up to 18 months expired
UK biometric residence card
UK frontier worker permit

## Schedule

**TABLE C**

Identity evidence required if verifying identity via the ACSP route and the ACSP does not have the appropriate technology to validate cryptographic features, (and/or the individual does not have the appropriate biometric evidence). The ACSP will require either two pieces of evidence from Group A or one from Group A and one from Group B:

Group A	Group B
Passport or Irish passport card, up to 18 months expired	Birth or adoption certificate
EU or EEA identity card	Marriage or civil partnership certificate
UK biometric residence permit, up to 18 months expired	Non-photographic immigration document
UK biometric residence card	Non-photographic visa
UK accredited PASS card	Non-photographic work permit
UK or EU digital tachograph driver's card	Bank or building society statement
UK, Channel Islands, Isle of Man and EU photocard driving licence, full or provisional	UK local authority or social housing rental agreement, at current address
UK HM Forces ID card	Mortgage statement, at current address
UK HM Armed Forces veteran card	UK council tax statement, at current address
UK frontier worker permit	Utility bill, at current address
Photographic work permit (government issued)	
Photographic immigration document	
Photographic visa	
UK, Channel Islands and Isle of Man Firearms licence	
Photographic ID listed on PRADO (Public Register of Authentic identity and travel Documents online) such as: Director Identification Number, India National Identity Card, Pakistan Crew member certificate, South Africa crew member certificate/pilot's licence	



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