

F E B R U A R Y 2 0 2 6

SPOTLIGHT ON:

Companies House ID checks

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WHAT DIRECTORS NEED TO DO

Companies House has started rolling out mandatory identity checks for directors and people with significant control (PSCs). These checks form part of a wider programme of Companies House reform under the Economic Crime and Corporate Transparency Act 2023, designed to improve the reliability of information on the public register and reduce the misuse of UK companies.

This guide explains who needs to verify, how the process works in practice, what you need to do for your own roles and what happens if you miss your due date.

WHAT IS CHANGING AND WHY IT MATTERS

Historically, Companies House accepted information largely on trust, with limited verification at the point of filing. Recent reforms give Companies House stronger powers to query and reject information, remove false or misleading content, and take a more active role as a gatekeeper of the register.

Companies House reports that, in the last year covered by its 2024 to 2025 annual report, it used new powers to remove suspicious information and combat registered office abuse, impacting over 100,000 companies (including striking off companies where necessary).

Identity verification is one of the centrepieces of this reform programme. The aim is straightforward: to make it harder for people to register companies, become directors or declare control using false identities.

KEY DATES AND THE TRANSITION PERIOD

Identity verification became a legal requirement from **18 November 2025**. Companies House describes this as the start of a **12-month transition period**, giving companies time to ensure directors and PSCs verify and then connect their verified identity to each role by the relevant due dates.

What this means in practice.

- **There is no single one-day deadline for everyone.** Your due date depends on your role and your filing cycle.
- **Companies House will show due dates on the public register** for each role you hold (displayed on the people tab).
- **Companies House also states it will email companies directly** before the confirmation statement filing deadline to explain what must be done.

If you act for multiple companies (or hold multiple roles), you should assume you will need to manage more than one deadline and process.



WHO NEEDS TO VERIFY THEIR IDENTITY?

Companies House guidance explains that you need to verify if you are any of the following:

- a **company director**
- the **equivalent of a director** (including members, general partners and managing officers)
- a **director of an overseas company registered in the UK**
- a **person with significant control (PSC)**
- an **authorised corporate service provider (ACSP)** (a Companies House authorised agent)
- (in due course) other filing roles, as Companies House expands the regime.

Companies House also notes it will introduce identity verification later for people who file at Companies House, limited partnerships, corporate directors, corporate limited liability partnership (LLP) members and officers of corporate PSCs.

THE TWO STEPS YOU MUST COMPLETE

A point that often gets missed is that the regime has two separate steps.

Companies House sets these out as the following:

1. **Complete an identity verification check** successfully and receive a unique identifier called a Companies House personal code.
2. **Provide an identity verification statement** to Companies House to confirm the identity is verified (this includes supplying your personal code) for each relevant role.

In other words, verifying once is not always the end of the job. You then need to use your personal code to connect your verified identity to each director/PSC role you hold, in the way Companies House requires.



WAYS TO VERIFY YOUR IDENTITY

Companies House allows two routes.

1. VERIFY ONLINE USING GOV.UK ONE LOGIN (FREE)

Companies House states the online route uses gov.uk One Login and is free of charge. Depending on your circumstances, gov.uk One Login may guide you through one of the following methods:

- using an app
- answering online security questions
- entering photo ID details online and then attending a participating Post Office (where directed).

Government communications around the rollout also reference the Post Office option as additional support for people who need help, while keeping the process digital end-to-end.

2. USE AN ACSP (MAY CHARGE A FEE)

An ACSP is an AML-supervised organisation or individual (for example, accountants, solicitors, company formation agents) that registers with Companies House to carry out identity verification on behalf of others. Companies House guidance notes that ACSPs may charge for this service.

If you already use an agent to file for you, the ACSP route can be practical, particularly where the person verifying cannot use the online route or is based overseas.

THE COMPANIES HOUSE PERSONAL CODE

When you successfully verify, Companies House issues a unique identifier known as your **Companies House personal code**. It is personal to you, not to a specific company.

Companies House guidance and blogs highlight these points.

- You generally **verify only once** (unless Companies House instructs otherwise).
- You use the code when you file a confirmation statement, get appointed as a director, or become a PSC.
- Keep the code secure and only share it with people you trust who file on your behalf.

- Where an ACSP verifies you, Companies House explains that an email will be sent containing your personal code and notes it is an 11-character identifier.

WHAT DIRECTORS MUST DO, STEP BY STEP

STEP 1: IDENTIFY WHICH ROLES YOU HOLD

Start by listing:

- each company where you act as a **director**
- any roles where you act as the **equivalent of a director** (for example, LLP member)
- whether you are also recorded as a **PSC**
- any overseas entity director roles (if relevant).

This matters because Companies House expects you to connect your verified identity to each role in the right way and, in some cases, within a specific time window.



STEP 2: COMPLETE IDENTITY VERIFICATION (ONLINE OR VIA AN ACSP)

Online route (gov.uk One Login)

You will need to set up (or use) a gov.uk One Login and follow the prompts to verify. Companies House and government updates describe the process as designed to be quick and accessible, using app, browser or Post Office routes, depending on what you have available.

Government communications provide some useful indicators of what users experienced during testing and early rollout, including:

- an average gov.uk ID checking app completion time of **2.4 minutes** (18 March to 30 June 2025)
- YouGov Business Omnibus findings (sample of 1,007 senior decision-makers) including **60% awareness** of the new requirements, **81% support** for identity verification, and **73%** agreeing directors/PSCs would find it easy to verify.

ACSP ROUTE

If an ACSP verifies you, you provide approved identity documents to them, and they complete the check and confirm it to Companies House using the relevant service. Companies House explains that ACSPs must verify to the same standard as the Companies House service, and they may charge for doing so.

STEP 3: RECORD AND SAFEGUARD YOUR PERSONAL CODE

Once you receive your personal code, treat it as a sensitive credential. Companies House explicitly advises keeping it secure and only sharing it with trusted people who file on your behalf.

Internal controls that work well in most businesses include:

- storing the code in a secure password manager (or an equivalent controlled record)
- limiting access to those who need it for filings
- keeping an audit trail of when you shared it and with whom.

STEP 4: CONNECT YOUR VERIFIED IDENTITY TO EACH ROLE BY THE DUE DATE

This step is where many directors will spend their time during the transition period.

Directors (and equivalents): Link via the confirmation statement

Companies House guidance states that directors will need to provide their personal code as part of the company's **next confirmation statement**. If you are a director of more than one company, you must do this for each one.

Companies House has also said that directors need to verify before filing the next confirmation statement, or the filing will be rejected.

PSCs: Link via the PSC verification details service, within a defined period

Companies House rules for PSCs include a time-limited window to provide the personal code, and the timing depends on your situation. Companies House guidance sets out the key scenarios.

If you are both a director and a PSC of the same company:

- you must provide the personal code separately for each role
- as a director, you provide it in the company's confirmation statement
- as a PSC, you provide it using the PSC verification details service within a **14-day period** starting the day after the company's confirmation statement date.

If you are a PSC but not a director of the same company:

- you must provide your personal code within the first **14 days of your birth month** (Companies House gives an example: if your date of birth is 22 January, the 14-day period begins on 1 January).

If you became a PSC after 18 November 2025:

- you can provide your personal code when first added to the register, or within 14 days of being added.

Companies House also notes you can check the dates of your 14-day period on the Companies House register.

New companies and new appointments

Companies House guidance states that when you register a new company, you will be asked to provide the personal code for each director as part of the registration filing.

This makes early verification useful if you plan to incorporate a new company or make new board appointments during 2026.

Overseas companies registered in the UK

If you are an overseas company, Companies House guidance says you must confirm all directors have verified their identity by the anniversary of the UK establishment's registration.

Companies House may take enforcement action where people miss their due dates, including issuing “default” letters and escalating where necessary

WHAT HAPPENS IF YOU DO NOT COMPLY

Companies House's published approach to non-compliance is direct on the legal position and the likely enforcement pathway.

Key points include the following:

- It is **unlawful** for a director to act as a director without completing identity verification; the company may also break the law if a director (or equivalent) is not verified. PSCs who do not verify may also commit an offence.
- Companies House describes enforcement routes that include **prosecution, referral to the Insolvency Service** and **financial penalties**.
- Companies House may take enforcement action where people miss their due dates, including issuing “default” letters and escalating where necessary.
- Even where Companies House does not select a case for prosecution, it notes that directors may still commit an offence for continuing to act without verification, and Companies House may refer cases to the Insolvency Service.
- As a practical filing consequence, Companies House has stated it will reject a confirmation statement if directors have not verified by the time the company tries to file.

EXTENSIONS FOR PSCS

Companies House also sets out a limited discretion to extend a PSC's identity verification due date by up to **14 days**, with rules on how extensions work and what happens after repeated extension requests.

If you anticipate missing a PSC window (for example, travel, illness or access issues), treat it as urgent and address it ahead of time rather than waiting for the window to close.

PRIVACY, SECURITY AND PRACTICAL HANDLING

A few practical points from Companies House guidance are worth highlighting.

- Use only the approved verification routes; Companies House states you should not post or email identity documents to it.
- Your verified identity connects to your gov.uk One Login if you use the online route, and One Login uses its own privacy notice for how it stores and uses information.
- Companies House explicitly warns that identity verification makes impersonation harder but not impossible, so you should still protect your personal code and remain alert to suspicious activity.

Separately, Companies House and the Government Digital Service have reported significant early uptake: over a million people verified their identity for Companies House via gov.uk One Login since April (in the period discussed in the November 2025 update).



A PREPARATION CHECKLIST THAT KEEPS THIS MANAGEABLE

Use the checklist below to keep control of the process, especially if you have more than one company or hold both director and PSC roles.

PERSONAL CHECKLIST

- Confirm which roles you hold: director, PSC, overseas director, LLP member (or equivalent).
- Verify your identity (online or via an ACSP).
- Store your Companies House personal code securely.
- Identify each company's next confirmation statement date and plan to provide the personal code as part of that filing.
- If you are a PSC, identify your PSC window and plan the separate PSC submission where required.

COMPANY CHECKLIST

- Ensure each director has completed verification ahead of the confirmation statement filing.
- Confirm who will submit the confirmation statement (internal team member or agent) and ensure they have the codes they need, handled securely.
- Check the Companies House register people tab for due dates and status indicators where shown.
- For any upcoming incorporations or director appointments, ensure individuals verify early so you can provide personal codes during the filing process.

NEXT STEPS

If you only take three actions:

1. Verify your identity (online or via an ACSP).
2. Store your personal code securely.
3. Ensure you provide the code in the right place for each role (confirmation statement for director roles, and the PSC service where required).

If you manage several companies, treat this as a mini project: capture roles, due dates and responsible filers in one place, then work through them methodically during the transition period.



**Reach out to us with any questions -
we are here to assist.**

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