

Clarion Guide to Identity Verification under ECCTA

Identity verification is a fundamental part of the reforms introduced by the Economic Crime and Corporate Transparency Act 2023 (“**ECCTA**”), which are designed to improve transparency in relation to who controls and manages UK companies, and to reduce the misuse of corporate structures.

In basic terms, identity verification is the process of proving that an individual is who they claim to be. This brief guide explains who needs to undergo identity verification, and when, and sets out the process to be followed. For further advice or assistance on identity verification and/or other ECCTA reforms, please contact your usual Clarion adviser.

Note that this note has been updated to reflect the position as of March 2026.

Who needs to verify?

Identity verification is an individual requirement and applies to all new and existing directors, LLP members, people with significant control (“**PSCs**”) of a company or an LLP, relevant officers of relevant legal entities, nominated directors of corporate general partners of limited partnerships, individuals acting as Authorised Corporate Service Providers (“**ACSPs**”), and those who file information with Companies House.

An ACSP is a new concept created by ECCTA and includes third-party agents who are supervised by an Anti-Money Laundering supervisory body in the UK, such as law firms, accountants, and company formation providers. Once registered as an ACSP (also known as a Companies House authorised agent), an ACSP can conduct identity verification on behalf of others and file information with Companies House.

What is the ECCTA implementation timeline?

- **18 March 2025** – Application process opened for ACSP registration.
- **8 April 2025** – Voluntary identity verification launched.
- **18 November 2025** – Identity verification became mandatory for new directors, LLP members and PSCs, and for existing roles there began a 12-month transition period via the relevant entity’s next annual confirmation statement filing.
- **Not before November 2026 (date to be confirmed)** – Identity verification to become mandatory for anyone filing documents at Companies House.

When should I verify?

If you are a new director or LLP member appointed after 18 November 2025, identity verification is a prerequisite to acting.

Existing directors or LLP members should ensure verification is completed as soon as possible, and in any event before the first relevant confirmation statement deadline for their related entities.

For PSCs, the specific timing will depend on whether the PSC is also a director, as set out below:

- **New PSCs:** 14 days from the date they register with Companies House.
- **Existing PSCs:** If also a director, 14 days from the relevant company’s confirmation statement date.
- **Existing PSCs:** If not a director, 14 days from the first day of their month of birth, as recorded on the Companies House register. For example, with a date of birth of 22 April, the 14 day period will begin on 1 April.

Existing individual directors, LLP members, and PSCs can confirm personal due dates for identity verification on the Companies House register (for each relevant related entity).

Note that identity verification requirements for limited partnerships, corporate directors of companies, corporate members of LLPs, and officers of corporate PSCs will commence later.

There are also proposals to implement restrictions on the use of corporate directors.

What happens once I verify?

Verification is intended to be a one-time requirement per individual, regardless of how many corporate roles you hold (past, present, and future) unless re-verification is requested by Companies House at a later date.

Once your identity is verified, you will be issued with an 11-character unique identifier code (also known as a Companies House personal code). The code is personal to you, not your entity or an entity you work for. This code will not be disclosed publicly but will be used to link all relevant appointments to your verified identity.

From 18 November 2025 onwards, you need your personal code for various reasons when you transact with Companies House to prove you have completed identity verification. For example, when a relevant entity files a confirmation statement, when you are appointed as a director and/or become a PSC.

Note that there is a separate service for providing personal codes for PSCs, who are required to provide their personal code during their relevant 14 day confirmation period as set out above.

How do I verify?

You can verify your identity in one of two ways: directly with Companies House, or through an ACSP. The route chosen will determine which identity documents you need to provide and the process you need to follow.

Companies House

Companies House uses the GOV.UK One Login free service to verify identities. This can be accessed via three routes: a mobile app, a web browser, or in person at a Post Office. Individuals with a biometric passport, a UK photo driving licence, or certain UK residence or work permits should be able to complete verification directly through Companies House via one of these options.

Companies House prefers the mobile app option due to the security of the technology that the app uses. Therefore, if you have documents that are capable of being verified by the app and a compatible smartphone, then the GOV.UK gateway will likely direct you to that route. This method is the quickest and most straightforward.

If using the web browser option, you will need to answer some personal security questions, based on information accessed through Experian, such as details about your mobile phone contract, bank accounts, credit cards, loans, or mortgages you may have. If you make a mistake in your answers, you will not be able to use this method again to prove your identity.

If you have an existing Companies House account, you may be asked to connect it to your GOV.UK One Login, or create a new one. This is simply a log in to access Companies House rather than an account used to make filings.

ACSP

Verification through an ACSP may be particularly helpful for non-UK residents or for those who do not hold biometric documents. ACSPs can manage both straightforward and more complex verifications and can advise on the documents required. An ACSP will charge a fee for this service.

It is important to note that not all registered ACSPs will provide identity verification services. Clarion, for example, will register as an ACSP to enable Clarion to file

documents at Companies House, but Clarion will not be offering identity verification as a service.

What happens if I do not verify?

Anyone who has not yet verified their identity should not take any actions on behalf of a company in the capacity of a director once their personal due date for identity verification has passed.

Acting while unverified will be a criminal offence and may result in a fine, although the appointment itself and any actions taken will remain valid. Companies must ensure that their directors do not act unless verified, or the company may also be committing an offence.

If a PSC fails, without reasonable excuse, to verify their identity, they will also commit a criminal offence.

Directors who persistently act without having been verified may also face disqualification. Enforcement action is expected to begin at the end of 2026.

What should I do now?

Businesses should ensure that all relevant individuals are aware of the requirements and confirm they have their appropriate identity documents. Directors and others in scope need to complete identity verification as soon as possible, well in advance of their personal due date for identity verification. Any inconsistencies in how an individual's name appears across Companies House records (for example, shortened names or missing middle names) should be reviewed and corrected with Companies House where appropriate in advance to ensure that the information aligns with the individual's identity documents and their verified identity. Once any issues have been considered, verification should be completed directly with Companies House if possible, given this is a free and straightforward service.

If verification is completed directly, it is recommended to take a screenshot or make a note of the personal code as soon as it is provided on screen, in advance of receiving any formal communication from Companies House or the code appearing in the 'manage account' section of your Companies House account. If you verify via an ACSP, it is understood that you will receive an email direct from Companies House containing your unique identifier code.

Once verified, those impacted should keep personal codes private and secure for future use.

Disclaimer: This document is intended as guidance only and does not constitute legal advice. Please do not rely on its contents without taking specific advice from one of our lawyers.

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