

United Kingdom's ECCTA Identity Verification Requirements Effective from 18 November 2025

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by Mark Taylor

Introduction

The **Economic Crime and Corporate Transparency Act 2023 (ECCTA)** was introduced to strengthen the UK's defences against economic crime, to improve corporate transparency and to enhance the integrity of the Companies House register. Companies House is the UK's official registrar of companies, and it maintains a public record of key company information including particulars of directors and persons with significant control (PSCs).

The provisions of the ECCTA which require company directors, PSCs, and individuals who file information at Companies House to verify their identity, came into force on **18 November 2025**.

This eUpdate provides an overview of the new requirements.

The New Rules

1. Who must verify their identity

Identity verification now applies to:

- a. Individual company directors (existing and newly appointed)
- b. Persons with Significant Control (PSCs)
- c. LLP members
- d. Individuals who deliver documents to Companies House, including company secretaries and other "presenters" authorised to submit filings

2. Timing and scope of new requirements

New directors and PSCs (from 18 November 2025)

- a. New directors must verify their identity before their appointment can be registered at Companies House.
- b. New PSCs must verify their identity within 14 days before their PSC details can be

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added to the PSC register.

- c. Companies House will reject filings related to unverified individuals.

Existing directors and PSCs (from 18 November 2025)

- d. Existing directors will need to submit their Companies House personal code when their company next files its confirmation statement. Anyone who sits on multiple boards will need to do this separately for each company (12-month transition phase).
- e. Existing PSCs who are also directors of the same company must provide their personal code twice: once in their capacity as director as part of the confirmation statement, and again in their capacity as PSC within 14 days after the confirmation statement filing. Companies House will introduce a specific service for submitting the PSC verification.
- f. Existing PSCs who are not directors must supply their personal code within the first 14 days of their birth month following commencement of the new rules.

3. Verification routes

Individuals can complete verification through one of two routes:

- a. Direct verification with Companies House free online service

Each director will need **one** of the following identity documents:

- i. a biometric passport from any country (UK passports issued after 2006 are biometric);
- ii. a UK photocard driving licence (full or provisional);
- iii. a UK biometric residence permit;
- iv. a UK biometric residence card; or
- v. a UK Frontier Worker permit.

The individual completing verification will need to photograph their face and show their identity document, allowing the system to check that the two match using electronic likeness-matching technology. If the check is successful, confirmation should be received within minutes. Other options will be offered for those who cannot use the standard digital route, and support is available throughout the process.

To use the online service, each director will need a **GOV.UK One Login** account, which securely stores that individual's Companies House information, including identity verification.

A GOV.UK One account can be created using [this link](#). Alongside one of the above ID documents, each director will need an email address and a way to receive authentication codes (either via a mobile phone number or an authenticator app).

Once the account is set up, the system will ask whether the individual has previously verified their identity and will direct the individual to verify either through the GOV.UK app

or directly via the website. The process is straightforward and only takes a few minutes to complete.

b. Verification via an Authorised Corporate Service Provider (ACSP)

Companies may use an ACSP (for example, a law firm or company secretarial provider authorised by Companies House). Filings submitted through an ACSP must include the ACSP's unique identifier confirming that checks have been completed.

The use of ACSPs is expected to become the primary route for many entities, as filings submitted by unverified individuals will not be accepted unless routed through an ACSP.

4. Practical implications for companies and LLPs

With immediate effect from 18 November 2025:

- a. Director appointments cannot be filed unless the director has been verified.
- b. Individuals submitting filings must be verified, or filings must be made through an ACSP.
- c. PSC changes will effectively require verification as part of onboarding.
- d. Entities will need to update internal governance processes to track and confirm verification status.

Routine filings (e.g., confirmation statements, changes in officers, PSC updates) may require additional internal steps before submission.

5. Consequences of non-compliance

Failure to comply may result in:

- a. Rejected filings at Companies House.
- b. Criminal offences for individuals who fail to verify within the required timeframe.
- c. Statutory restrictions on PSCs.
- d. Annotations on the public register indicating non-compliance.

Individuals who continue to act as directors without having been verified may commit an offence and may be subject to disqualification.

Companies may face operational restrictions if filings cannot be accepted due to unverified individuals.

Companies House has indicated that initial enforcement will be "proportionate", but persistent non-compliance is likely to attract sanctions.

6. Recommended next steps

Organisations should:

- a. Identify all directors, PSCs, LLP members and authorised filers requiring verification.
- b. Decide whether to rely on the direct verification route with Companies House or engage an ACSP.
- c. Integrate identity verification into onboarding procedures for new directors and PSCs.
- d. Communicate obligations and timelines clearly to existing directors and PSCs.
- e. Review who is authorised to submit filings on behalf of the entity and ensure their verification status.

Ask Dorsey London

Please speak to your usual Dorsey London contact for further information.

This eUpdate is intended to provide general guidance on the above topic. It is not comprehensive and it does not constitute legal advice given by this Firm.