

PRACTICAL GUIDE FOR IDENTITY VERIFICATION

as introduced under the Economic Crime and
Corporate Transparency Act 2023 (ECCTA 2023)



A step-by-step guide for companies and LLPs to comply with the new identity verification (IDV) requirements for directors, people with significant control (PSCs) and LLP members.

WHY DO I NEED TO KNOW THIS?

From 18 November 2025, it will be compulsory for all new directors and PSCs to undergo IDV as part of the incorporation process for new companies.

Existing directors and PSCs will need to verify their identity during a 12-month transition period starting from 18 November 2025. This will tie in with when the company's next annual confirmation statement is filed.

Identity verification will link a person with a primary identity document e.g. a passport or driving licence. This will only need to be done once.

When the identity has been verified, Companies House will send a unique identifier number which can be used for any new or existing appointments.

HOW DO I DO THIS?

Direct Verification: directly through Companies House using a 'standard digital' verification process:

- APP (GOV.UK One Login Check App) or
- WEB BROWSER (GOV.UK One Login Web Service), or
- 'assisted digital' verification via a face-to-face meeting at a POST OFFICE.

Indirect Verification via an ACSP: through an Authorised Corporate Service Provider (ACSP) who verifies identities.

WHAT DO I NEED?

For direct verification:

- 'personal information' e.g., name (including former name), date of birth, current home addresses (and previous home addresses if less than 12 months at the current address);
- 'contact information' (ie an email address or a telephone number).
- 'evidence':
 - passport with a biometric chip (which can be used across all channels); or
 - passport without a biometric chip (which can only be used for the web (if UK passport) and face-to-face services (it cannot be used for the app); or
 - an expired passport may be used on the web service provided it is no more than 6 months out of date or on the face-to-face service provided it is no more than 18 months out of date (and, in the case of non-biometric passports, only for supported countries); or
 - UK photocard driving licence (full or provisional) – this is acceptable across all channels; or
 - An EU photocard driving licence is only acceptable for the face-to-face service.



Other acceptable evidence, depending on the channel used:

USING THE GOV.UK ONE LOGIN ID CHECK APP	USING THE GOV.UK ONE LOGIN WEB SERVICE	USING THE GOV.UK ONE LOGIN FACE TO FACE SERVICE
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 biometric chip, supported countries only, 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

The app requires UK documents or an in-date non-UK biometric passport.

The web service is limited to those with UK documents (including a UK bank account with supporting UK NI number).

If none of the UK documents listed in the table above, or a non-UK biometric passport has expired, the face-to-face service can be used provided one of the other documents listed is available.

If none of the listed documents are available, then an ACSP must be used.

For indirect verification via an ACSP:

The ACSP must be given the 'personal information', 'contact information' and 'evidence'.

The ACSP will explain what evidence they need to see. This will depend upon whether they carry out checks in person (i.e. by someone trained to a certain standard) or via IDV technology.

The list of evidence the ACSP can use to verify identity is wider than that required for direct verification. However, if the ACSP does not have software that can validate cryptographic features, additional evidence must be provided.

Where available, biometric or photographic evidence must be provided that can be assessed for likeness.

Additional questions will also be asked to support the application.



WHAT NEXT?

For the GOV.UK One Login Check APP:

Using a suitable smartphone with a camera, download the GOV.UK Check App and follow the provided guidance.

For the GOV.UK One Login WEB SERVICE:

Be prepared to answer security questions online e.g. details of loans, credit cards, mortgages etc. the individual may have.

For the GOV.UK One Login FACE TO FACE SERVICE:

Using the booking system on GOV.UK One Login website, book an interview. To do this, details of a photo ID details and UK home address will be needed. Then visit a Post Office in person with the required evidence.

For indirect verification:

The ACSP will guide the individual through their process, which will align with the regulations.

An application is considered received once the Registrar has confirmation from the chosen verification channel that the identity check is complete.

WHAT IF I DON'T?

- Non-compliance will result in the Registrar marking the individual as 'not verified' on the public register.
- Contravention of the IDV requirements by individuals may constitute a criminal offence, leading to fines or civil penalties.
- Once mandatory IDV is in force, a company (and its officers) with unverified directors will also commit an offence and risk a fine. However, the validity of that individual's acts as a director will not be affected.
- Practical implications include the inability to make statutory filings without verified identities, register a new company or act as a new director.
- If the Registrar has reasonable cause to believe that the information provided is misleading, false, or deceptive, they will be able to send re-verification notices to individuals who have verified their identities.



COOPER PARRY