

Articles + Publications | October 21, 2025

Important Update for UK Company Directors, LLP members, and PSCs – Companies House Identity Verification Requirements

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From 18 November 2025, new legal requirements for UK company directors, LLP members, and people with significant control (PSCs) to verify their identity will come into effect under the UK's Economic Crime and Corporate Transparency Act 2023.

From 18 November 2025, it will become mandatory for all UK company directors, LLP members, and PSCs to verify their identity for use at Companies House. Failure to do so will result in being unable to form a new company or file an existing company's annual confirmation statement, thereby putting the company in danger of being struck off. It will be an offence for a person to act as a director if they have not verified their identity by the relevant deadline. The company will also commit an offence if it allows a person who has not verified their identity to act as a director. A PSC who fails to provide confirmation that their identity has been verified will also commit an offence.

With effect from 18 November 2025, ID verification becomes obligatory for directors, LLP members, and PSCs for (a) registering **new** companies and LLPs; and (b) **new** appointments to existing companies and LLPs.

For **existing** directors, PSCs and LLP members there is a 12-month transition period for compliance with the precise deadline for ID verification compliance depending on the role held. Please see further Companies House guidance on the rollout here:

https://www.gov.uk/government/news/companies-house-confirms-identity-verification-rollout-from-18-november-2025.

Companies House has stated that ID verification requirements for limited partnerships, corporate directors of companies, corporate members of limited liability partnerships, and officers of corporate PSCs will commence at a later date.

How to verify your identification

The good news is that the verification process is relatively quick and simple. Directors and PSCs can verify their identity via:

- the Companies House verification service (Verify your identity for Companies House GOV.UK) no charge; or
- an Authorised Corporate Service Provider (ACSP) that is licensed to conduct the verification fees/charges determined by the ACSP.

Once identity verification is complete, the individual will receive a personal verification code. <u>Please keep this</u> <u>personal verification code safe</u>. Directors, PSCs, and LLP members will need this code to form new companies and LLPs and to make certain Companies House filings for existing companies and LLPs.

Once individuals have verified their identity (either with Companies House or an ACSP), they will not need to do so again. The personal code will be valid for use in respect of all UK companies or LLPs of which the individual is a director, member, or a PSC.

From 18 November, directors and PSCs will also be able to check the Companies House register to see identity verification due dates for all their roles.

We encourage individuals to verify their identities as early as possible.

Please note, Troutman Pepper Locke UK LLP is not currently an authorised ACSP and is not able to verify the identities of directors, PSCs, and LLP members (we can provide details of the ACSPs that we work with who should be able to help you). We will continue to be able to make Companies House filings on behalf of our clients.

If you have any questions in respect of the verification requirements or need assistance, please do not hesitate to contact Nick Jennings at Nicholas.Jennings@troutman.com or Charlotte Whitley-Roberts at Charlotte.Whitley-Roberts@troutman.com.

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