NOVEMBER 2026

# SPOTLIGHT ON:

## Companies House identity verification



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# THE LAST CALL FOR UNVERIFIED DIRECTORS AND PSCs

Companies House identity verification is the legal requirement for every company director and person with significant control (PSC) to prove who they are. Each person verifies once, then links that verified identity to every role they hold on the public register. The requirement became compulsory on 18 November 2025 under the Economic Crime and Corporate Transparency Act 2023.

New directors and PSCs have had to verify from day one. Existing directors and PSCs were given a 12-month transition period, with individual deadlines tied to each company's confirmation statement date or, for some PSCs, their month of birth. That transition period runs until 17 November 2026, after which Companies House plans to step up compliance action against anyone who has not verified.

Many people still have work to do. Companies House figures show that, as at 30 June 2026, only 55% of director appointments and 42% of individual PSC appointments had been verified.

The risks are no longer theoretical. A company cannot file its confirmation statement until every director has verified, and in September 2026 the Insolvency Service secured the first convictions of directors who had not complied. This guide explains who still needs to act and how to close any remaining gaps.

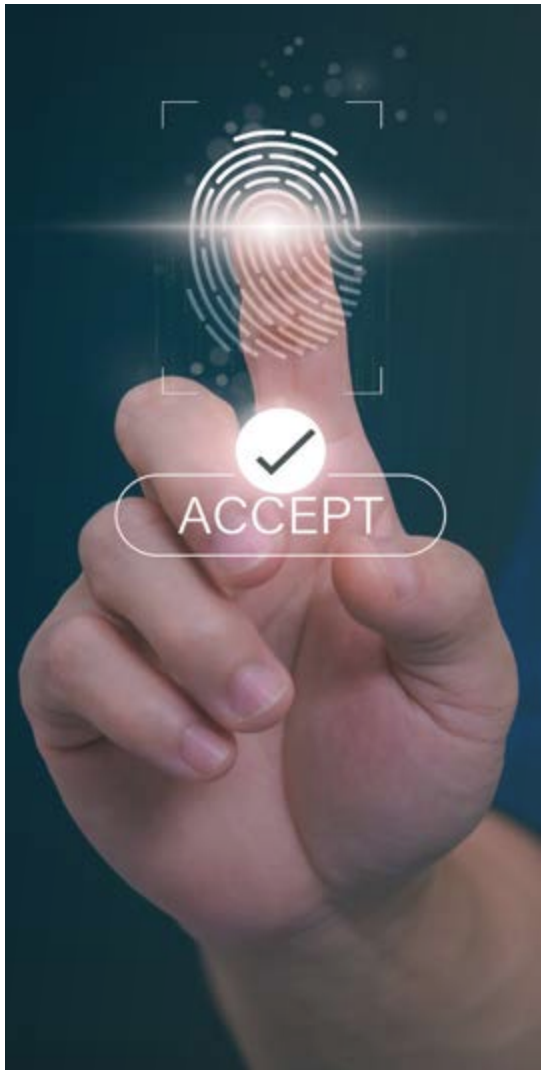
## KEY TAKEAWAYS

- The transition for existing directors and PSCs ends on 17 November 2026, but most individual deadlines fall earlier.
- Verifying is only the first step – each person must also link their personal code to every role.
- Companies House will not accept a confirmation statement until every director has verified.
- PSCs have their own 14-day windows, separate from the company's filing date.
- The first directors were convicted and fined in September 2026.

## WHY COMPANIES HOUSE NOW CHECKS WHO YOU ARE

Companies House now checks the identity of the people who run and control UK companies, instead of taking the information it receives largely at face value. The Economic Crime and Corporate Transparency Act 2023 gave it new powers to query, reject and remove information, with identity verification at the centre of the reforms.

Until these changes, anyone could be named as a director without proving who they were. Companies House has had to remove names and addresses that were used without the owner's consent, and verification is designed to make that kind of misuse much harder.



## WHO HAS TO VERIFY?

Every individual director and every individual PSC of a UK company must verify, however small or inactive the company. The requirement currently covers:

- **Directors:** Including non-executive directors and directors of dormant companies.
- **People with significant control:** Generally, individuals with more than 25% of the shares or voting rights, the right to appoint or remove most of the board, or significant influence or control.
- **LLP members:** Individual members of limited liability partnerships follow broadly the same approach as company directors.
- **Directors of overseas companies with a UK establishment:** The company must confirm that all its directors have verified by the anniversary of the UK establishment's registration.

Company secretaries and shareholders below the PSC thresholds do not currently need to verify, unless they also hold another role such as director.

The rules apply in the same way to companies registered in England and Wales, Scotland and Northern Ireland.

## WHERE THE TRANSITION STANDS IN NOVEMBER 2026

The 12-month transition period for existing directors and PSCs began on 18 November 2025 and runs until 17 November 2026. It was never a single deadline. Each person's due date depends on their company's confirmation statement date or, for PSCs who are not directors, their birth month. For most people, that date has already passed.

Companies House's transition plan, last updated on 5 August 2026, puts the number of existing directors and PSCs who need to verify at more than 7 million. Once the transition ends, Companies House plans to start compliance activity against those who have not verified. Its 2026 to 2027 business plan aims for every company to be compliant, or on a path to compliance or enforcement, by the end of March 2027.

> ***Once the transition ends, Companies House plans to start compliance activity against those who have not verified***

## WHEN MUST AN EXISTING DIRECTOR VERIFY?

An existing director must verify before the company files its first confirmation statement under the new rules. Companies House will not accept that statement until every director has verified and their personal code has been included.

A confirmation statement is normally due within 14 days of the company's confirmation date. For most directors, that filing date – not the end of the transition period – is the real deadline. Companies House emails the company's registered email address before each statement is due, so it is worth checking that the inbox is monitored.

A director of several companies verifies once, but must provide the personal code on each company's confirmation statement. Each filing date sets its own deadline.

A company that has filed a confirmation statement since 18 November 2025 should already have verified directors, because Companies House could not otherwise have accepted it. The usual gaps are an overdue statement held up by one director, or a director who is also a PSC and has missed the separate PSC step.



## PSCs: TWO DIFFERENT 14-DAY WINDOWS

A PSC must provide their personal code to Companies House within a fixed 14-day period. The timing depends on whether they are also a director of the same company.

- **PSCs who are also directors:** Provide the code twice – once on the confirmation statement as a director, and again through the separate PSC verification service. The PSC step falls in the 14 days starting the day after the company's confirmation date, and filing early does not move it.
- **PSCs who are not directors:** Provide the code within the first 14 days of your birth month. Someone born on 22 January, for example, has a window from 1 to 14 January.
- **People who became a PSC after 18 November 2025:** Provide the code when first added to the register, or within 14 days of being added.

Each PSC can check the dates of their own window on the Companies House register. An extension of up to 14 days can be requested, but only before the deadline passes.

No verification is needed for a PSC who has died. They normally remain on the register until a grant of probate or letters of administration (or confirmation in Scotland) is received.

## VERIFYING IS ONLY HALF THE JOB

Completing the identity check does not, on its own, meet the legal requirement. Each person must also provide an identity verification statement, using their personal code, for every role they hold.

The personal code is an 11-character reference that belongs to the individual, not the company. A director of three companies verifies once and provides the same code three times. Anyone who verified through GOV.UK One Login can find the code in their Companies House account, while people verified by an authorised agent receive it by email.

Two simple checks prevent most problems:

- **Keep the code safe:** Share it only with people who file on your behalf, such as your adviser. Companies House can issue a new code if yours may have been compromised.
- **Check your date of birth:** Companies House's records must match your identity documents, or the code may not link to your record until the error is corrected.

## HOW CAN I VERIFY?

Most people can verify directly with Companies House, free of charge, through GOV.UK One Login. The quickest option is usually the GOV.UK One Login app on a smartphone. It accepts a biometric passport from any country, a UK photo driving licence, or a UK biometric residence permit or card. You will also need your current address and the year you moved in.

UK residents without one of these documents may be offered other routes, such as bank or building society details with a National Insurance number. There is also an in-person check at a Post Office, which must be started online. An expired passport cannot be used in the app, although a DVLA driving licence that expired within the last 90 days can be.

The alternative is an Authorised Corporate Service Provider (ACSP), also known as a Companies House authorised agent. ACSPs are firms such as accountants, solicitors and formation agents that are supervised for anti-money laundering purposes and registered with Companies House. Their checks must meet the same standard as direct verification, though they may charge for the service. An ACSP can be particularly helpful for directors who live overseas or lack the documents the online service accepts.

## NEW DIRECTORS, NEW PSCs AND NEW COMPANIES

Anyone appointed as a director since 18 November 2025 must verify first, because the appointment filing has to include their personal code. The same applies when a company is formed: the application to incorporate must include a personal code for each proposed director.

New PSCs, of new or existing companies, can provide their code when first added to the register or within 14 days of being added.

Succession planning now needs an extra step. Bringing a family member onto the board, or selling a significant stake to an investor, can trigger a verification requirement. Build the check into the timetable rather than discovering it on the day.

## DOES ANYONE ELSE IN THE BUSINESS NEED TO VERIFY?

Not yet, in most cases. Staff and advisers who file documents on a company's behalf will eventually need to verify or be registered as an ACSP. Companies House has said this will start no earlier than November 2027, with at least six months' notice.

Other groups will be brought in at a later date:

- **Corporate roles:** Corporate directors, which will also face new restrictions, together with the officers of corporate PSCs and corporate members of LLPs.
- **Limited partnerships:** Identity checks are due later, alongside wider reforms expected no sooner than the end of 2026.

If your group includes a corporate director or a company registered as a PSC, it is worth reviewing the structure before those rules arrive.

## WHAT HAPPENS IF SOMEONE MISSES THEIR DEADLINE?

Missing a deadline is a criminal offence, and the consequences can reach beyond the person who failed to act. A director who acts without verifying commits an offence, and the company – and potentially its other directors – may be committing one too. A PSC who does not provide their code on time may also be committing an offence.

Companies House normally starts with a default letter. After that, its three main enforcement routes are:

- **Financial penalties:** Issued to the company or to individual officers. Companies House's general scale runs from £250 for a first minor offence to £2,000 for a fourth or later very serious offence. Daily penalties can apply while a failure continues.
- **Referral to the Insolvency Service:** Particularly where an unverified director keeps acting.
- **Prosecution:** More likely in serious or repeated cases, and potentially leading to fines and director disqualification.

A note can also be added against an unverified PSC's name on the public register. The company cannot file its confirmation statement while any director remains unverified, and a persistently overdue statement can lead to the company being struck off.

Decisions and documents signed by an unverified director generally remain valid, but the offence still stands. In exceptional circumstances, such as a serious IT failure at the deadline, Companies House may accept a written explanation and pause enforcement, usually for up to two months.

## LESSONS FROM THE FIRST PROSECUTIONS

The first convictions show that responsibility for verification extends to the whole board, not just the person who failed to verify. On 16 September 2026, three directors were fined at City of London Magistrates' Court in the Insolvency Service's first prosecutions for identity verification offences.

Two of the three had carried on acting as directors while unverified, including signing company accounts. The third had verified their own identity but was convicted for failing to take reasonable steps to stop an unverified co-director from acting. All three were also convicted over confirmation statements that were not filed on time.

The court fines in those cases were small – between £80 and £307 each, plus £85 costs and a victim surcharge. The larger cost is a criminal conviction, publicised by the government, arising from what began as an administrative task.

## WORKED EXAMPLE: A FAMILY COMPANY WITH A NOVEMBER CONFIRMATION DATE

Suppose you and your co-director each own 35% of a trading company, and your father owns the other 30% but has no board role. Each of you holds more than 25% of the shares, so all three are PSCs. The company last filed a confirmation statement on 6 November 2025, just before the new rules began. Its next confirmation date, 6 November 2026, therefore brings its first filing under the new regime. Your father was born on 19 November.

The deadlines fall like this:

- **You and your co-director, as directors:** Verify and include your personal codes before filing. The statement is due by 20 November 2026, 14 days after the confirmation date.
- **You and your co-director, as PSCs:** Provide your codes again through the PSC service, between 7 and 20 November 2026.
- **Your father:** As a PSC who is not a director, he must provide his code from 1 to 14 November 2026 – the first 14 days of his birth month. Any extension request must be made by 14 November.

Now, suppose your co-director still has not verified on 20 November. Companies House will not accept the statement, so the company is in default from 21 November. Your co-director commits an offence by continuing to act. You could also be exposed for failing to take reasonable steps to stop them – exactly what happened in one of the first prosecutions.



## A CHECKLIST BEFORE YOUR NEXT FILING

Working through these points before your company's next confirmation statement can prevent a rejected filing:

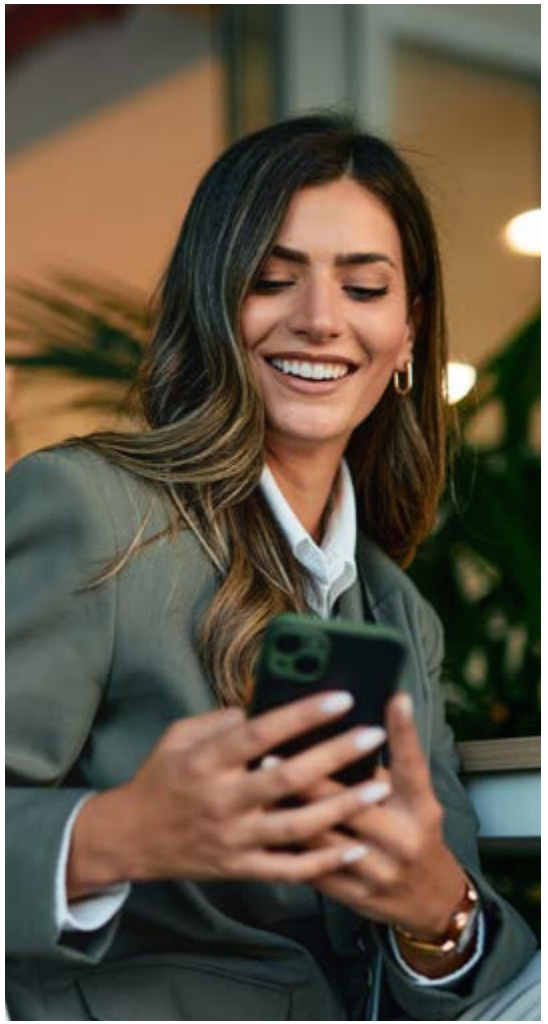
- Check the Companies House register for every director and PSC, including the verification due date shown for each role.
- Confirm that each person has verified and holds an 11-character personal code.
- Collect every director's code before the filing date, or make sure each director has shared it with whoever files for you.
- Diarise each PSC's 14-day window separately from the company's filing date.
- Check that dates of birth on the register match each person's identity documents.
- Agree in advance what happens if a director cannot or will not verify, because an unverified director cannot lawfully continue to act.
- Build verification into any planned appointment or share sale.

## WRAPPING UP

Identity verification is now part of the routine of running a UK company. Every director and PSC needs to verify once and link their personal code to each role. The deadline that counts is usually their own, not the end of the transition period.

With the transition closing on 17 November 2026 and the first convictions secured, Companies House is moving from reminders to enforcement. A single unverified director can block a confirmation statement and expose the company, and the rest of the board, to penalties.

**If any director or PSC has not yet verified, or you plan to appoint a director or bring in a major shareholder, contact us before your next confirmation statement is due. We can check the register with you and confirm each person's deadline.**



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