

# ECCTA in Action: What Governance Professionals Need to Know About Key Person Verification

A joint insight from Kuberno and TLT on navigating compliance under the Economic Crime and Corporate Transparency Act.



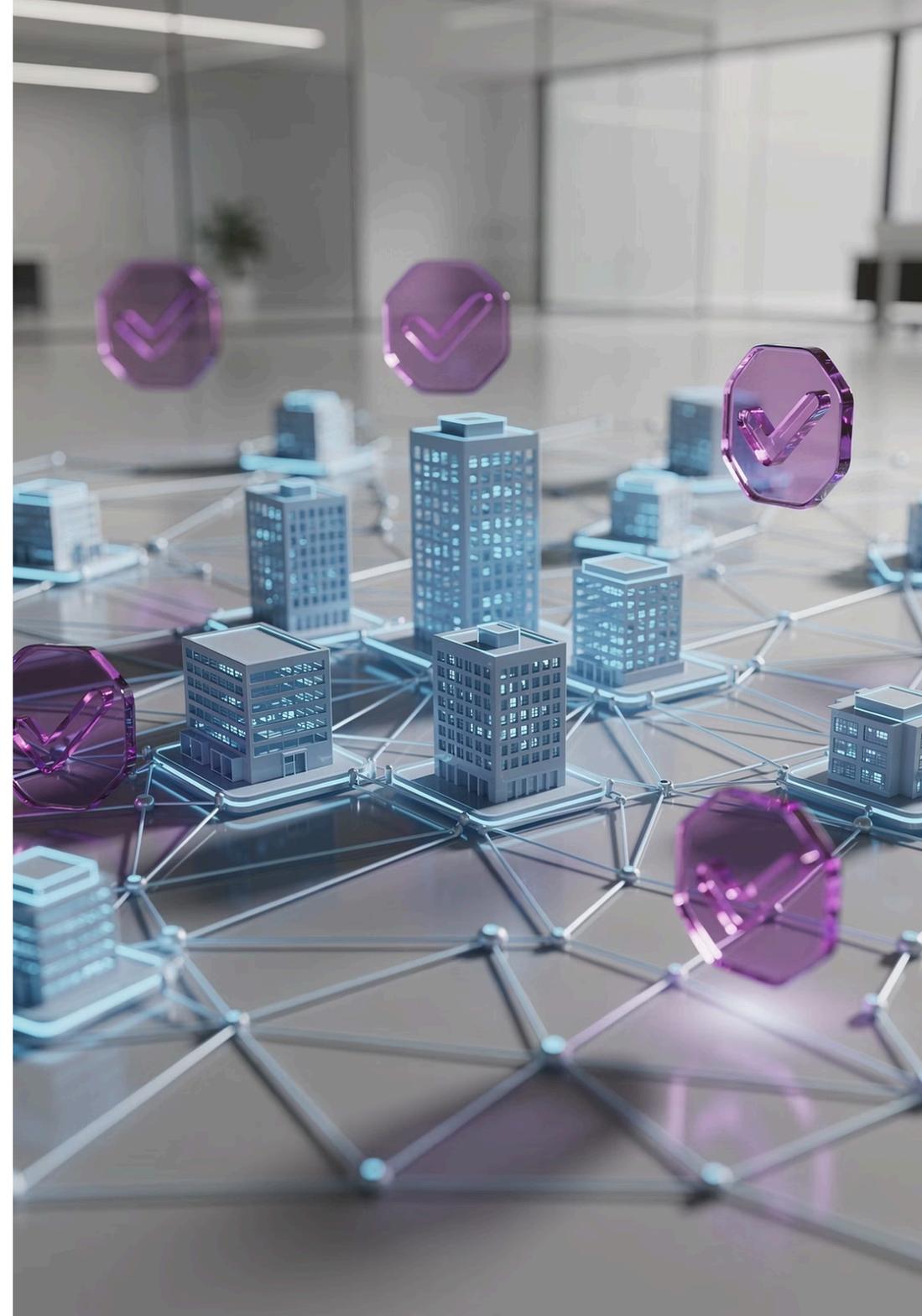
# A Critical New Phase for Corporate Transparency

The Economic Crime and Corporate Transparency Act 2023 (ECCTA) has entered a critical new phase with mandatory identity verification for key individuals associated with UK corporate entities now live. This marks a significant shift in corporate transparency requirements and introduces new compliance challenges for governance professionals.

**Why does this matter now?** Identity verification is no longer optional; it's a legal obligation.

For governance teams, this means increased complexity, tighter timelines, and heightened reputational risk. Proactive planning and robust processes are essential to stay ahead.

That's why we have collaborated with TLT to bring you both the statutory position and practical insights on how to navigate these changes - helping you plan proactively and adopt robust processes to stay ahead of further ECCTA developments.



# Requirements Under ECCTA: Who Must Verify?

On 18 November 2025, Companies House introduced compulsory identity verification for new and existing individual directors, limited liability partnerships (LLP) members, and "people with significant control" (PSCs) of UK corporates and UK establishments. Those individuals must verify their identity with Companies House by providing photo ID and other personal information.

There is **criminal liability** for the individual, corporate entity and other officers of the corporate for getting this wrong. Particularly, if you continue to act as a director (or equivalent for other entity types) without verifying when required, you will be breaching the law and could be disqualified.

When exactly you have to ID verify depends on your role and whether you are already appointed, or about to be:

## Directors and LLP Members



- First directors of new companies must verify before incorporation. The same is true of first LLP members of new LLPs.
- New directors of existing companies must verify their identity before notifying Companies House of their appointment.
- New LLP members of existing LLPs must verify their identity before notifying Companies House of their admission.
- Existing directors and LLP members must verify their identity before the due date for filing the next annual confirmation statement.

## Persons with Significant Control (PSCs)

Individual PSCs must verify within a 14-day period, the start date of which varies depending on their circumstances:



Date of becoming a PSC	When does the 14 day period begin?
If they become a PSC for the first time	From the date they are notified as a PSC with Companies House
If they are already a PSC and also a director (or equivalent) of the same entity	From the due date of the entity's next confirmation statement
If they are already a PSC but are not a director (or equivalent) of the same entity	From the first day of their month of birth (as shown on the Companies House register). For example, for someone born in March 1990, the period starts on 1 March 2026

## Overseas Companies

Individual directors of overseas companies with UK establishments (also known as "branches") must also verify their identity.



- New directors must verify before notifying Companies House of their appointment.
- Existing directors must verify by the first anniversary of the date the UK establishment was opened after 18 November 2025.

Overseas directors can potentially use any of the verification methods outlined below, although visiting a UK passport office may not be practical, and their identification documents need to meet certain requirements. An Authorised Corporate Service Provider (as described below) can provide verification services if the online process is not simple for a particular individual.

# How to Complete Verification

Identity verification can be completed in three different ways:

01

---

## Online via Gov.UK One Login

Complete verification through the Gov.UK One Login app or by answering security questions.

02

---

## In Person at the Post Office

Visit a UK Post Office location to verify your identity in person.

03

---

## Through an ACSP

Use an Authorised Corporate Service Provider (ACSP) such as a company formation agent, lawyer or accountant.

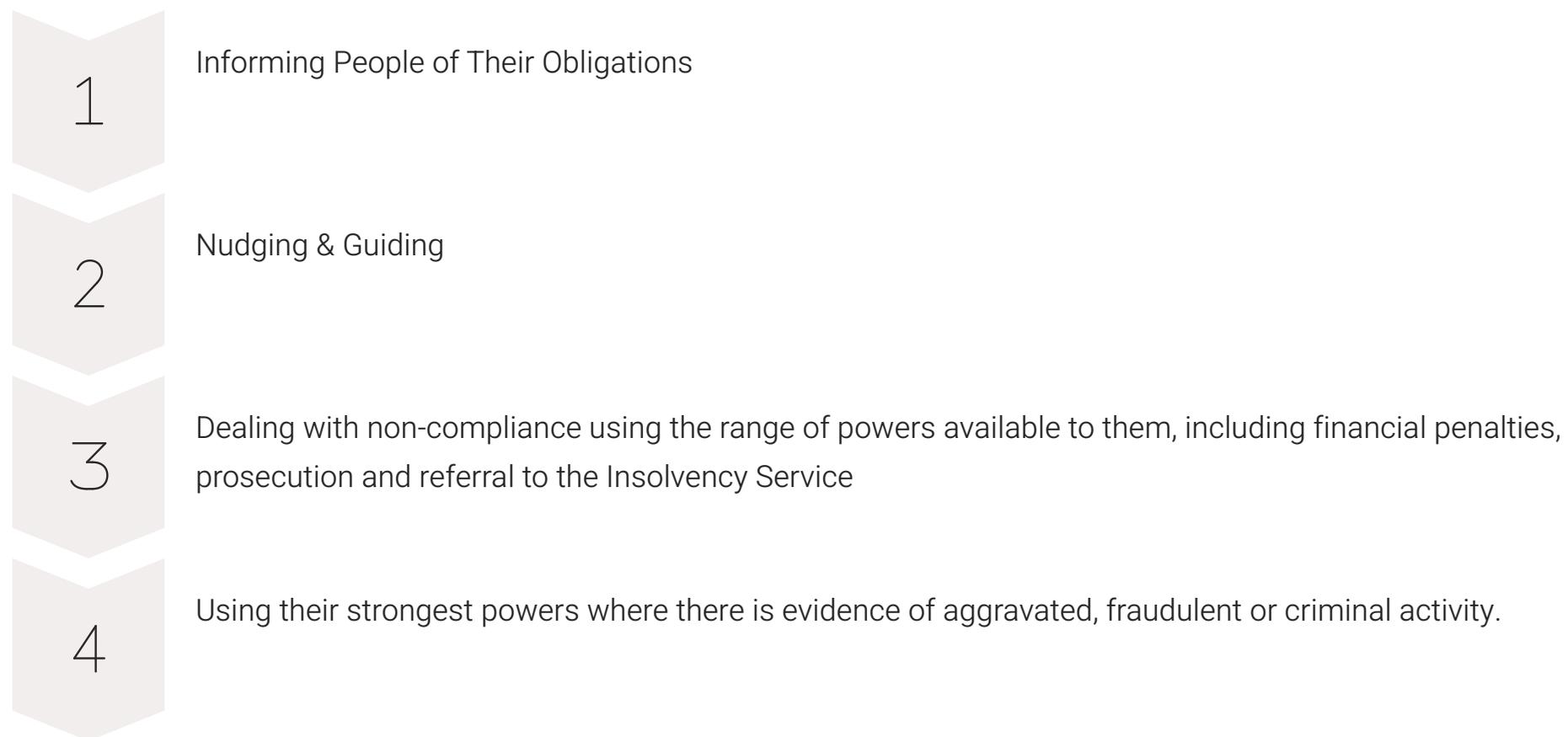
Identity verification is free if an individual submits information directly to Companies House, or through a Post Office appointment. An ACSP will charge for their verification services. For more information on the verification process and the evidence required, see this detailed [overview](#) and Companies House [guidance](#).

 **Important:** When a person has successfully verified, they will receive an email from Companies House confirming their unique 11 character code (known also as their personal code). Their code should also be visible if [they sign into Companies House](#) and go to the “Manage account” section. This code must be securely stored as it will be needed for future appointments and filings (particularly confirmation statements). It's important to note that verification codes will not be visible on the public register, and ACSPs will not receive this information directly.

# Non-Compliance: Understanding the Consequences

Failing to verify when required to do so will have various consequences – for the individual, corporate entity and its directors. Specifically for directors, it will be a criminal offence for individuals to act as such while unverified. And companies will commit a criminal offence if they allow unverified directors to act.

Companies House has recently published this [guidance](#) setting out the action they will take for non-compliance. Their approach to enforcement includes four broad categories:



They can also:

- direct a company to take an action or refrain from taking an action;
- note non-compliance on the Companies House public record;
- pursue a civil case;
- disqualify directors;
- apply for a court order requiring a company to file or provide documents; and
- prosecute companies and remove defaulting companies from the register.

# Legal Perspective: What to Action Now

We recommend that directors and LLP members of UK corporate entities and “branches” take the following steps:



Map out who needs to verify (individual directors, PSCs and LLP members).



Identify upcoming deadlines, particularly confirmation statement due dates.



Check PSC birth dates are correct to accurately calculate their verification deadlines.



Check PSC information more generally – has the right person(s) been identified as PSCs? This may have changed with share transfers, or shareholder contractual arrangements creating enhanced control or influence for certain people.



Advise relevant individuals of the new ID verification reforms and their obligations - ask them to gather their ID documents and verify as soon as possible.



Choose the most suitable verification route for each individual (online, in-person or ACSP).



Develop secure processes for collecting and storing personal codes so they are available for future filings.



Update internal policies to reflect new verification, appointment and admission requirements. For example, if appointing a new director, make sure it is clear that they must provide a personal code to the appointing company before a Companies House appointment form is submitted.

## What's Coming Next

It's important to note that the reforms outlined above form part of a much larger set of reforms being introduced by ECCTA. Changes have been, and continue to be, introduced in a phased way and we have summarised the planned implementation table [here](#). This shows what has already been introduced and what is coming up.

By Spring 2026, Companies House intends to introduce verification processes for anyone making filings (e.g. company secretaries) with Companies House. Depending on who the “presenter” is, this will either involve identity verification or registration as an ACSP.

It is not yet clear when PSC identity verification will be extended to capture “relevant legal entities” (RLEs). When introduced, this will involve verifying the identity of an individual who is a relevant officer of the RLE.

Company law is also to be changed so that corporate directors will no longer be allowed unless they satisfy certain conditions. The timeline of this has not been announced but general information can be found [here](#).

We recommend that directors and LLP members of UK entities and branches monitor updates for the above changes and the broader reforms still to come as outlined in the timeline.

# Technology Enablement: How Kuberno Simplifies Compliance

Compliance under ECCTA isn't just a legal exercise, it's an operational challenge and this is where technology coupled with well thought through processes to engage with your individual directors, LLP members and PSCs can help governance teams meet their requirements efficiently and with confidence:

Kube has a direct integration with Companies House which allows users to automate filings and track changes in real time offering:

- **Identity Code Capture**

Securely store Companies House personal codes for directors and PSCs. With the ability to restrict access to this data only to individuals who need it.

- **Automatic Form Population**

ECCTA compliant Companies House forms are generated with the relevant data points populated when an activity is action through Kube. Saving time and reducing human input error.

- **Direct Integration with Companies House**

Following approvals within Kube filings are automatically sent to Companies House without having to leave the system.

- **Compliance Dashboards**

Monitor verification status and deadlines across your portfolio with export reports available to aid further collaboration.

- **Audit-Ready Records**

Maintain a clear, defensible compliance trail of all activity undertaken within Kube.

- **Single Source of Truth**

For all your entity, director, LLP member and PSC data.



# Looking Ahead: Future ECCTA Developments

At Kuberno, we're working closely with our customers and Companies House to anticipate the changes required under ECCTA and ensure compliance is future proofed.

## Our Roadmap Includes:



### Continuous Platform Enhancements

Expanding Kube's capabilities to support new ECCTA requirements as they emerge.



### Regular Stakeholder Engagement

Hosting forums and webinars to keep governance professionals informed and aligned.



### Collaborative Guidance

Collaborating with legal experts like TLT to provide practical, integrated solutions.

## We Recommend Organisations:

### Update Policies Continuously

Update governance frameworks as obligations evolve.

### Leverage Technology and Legal Partnerships

Integrated solutions reduce risk and complexity.

### Engage Stakeholders Early

Ensure directors, LLP members and PSCs, understand their responsibilities.

### Track Future Reforms

Get ready for what comes next, TLT's ECCTA [Hub](#) contains lots of useful information, as does [this](#) Companies House blog.

 **Key Takeaway:** Staying ahead means embedding compliance into your governance framework, not treating it as a one-off project.

# Ready to Simplify Your ECCTA Compliance?

Want to explore how legal and technology solutions can simplify ECCTA compliance? Connect with TLT and Kuberno for tailored guidance and practical tools.

## Stay Informed

Sign up to our [mailing list](#) to stay informed.

## Watch the Webinar

Watch the Kube [Webinar](#) Replay.

## Access Guides

Access TLT's Practical [Guides](#).

---

## Contact TLT

Henry Male - [Henry.Male@TLT.com](mailto:Henry.Male@TLT.com)

Legal Director - Corporate

## Contact Kuberno

Nicola Hooper - [nicola.hooper@kuberno.com](mailto:nicola.hooper@kuberno.com)

Head of Community

