
Catalogue of Consultation Questions

The case for verifying identities

Q1. Do you agree with the general premise that Companies House should have the ability to check the identity of individuals on the register? Please explain your reasons.

Q2. Are you aware of any other pros or cons government will need to consider in introducing identity verification?

Q3. Are there other options the government should consider to provide greater certainty over who is setting up, managing and controlling corporate entities?

How identity verification might work in practice

Q4. Do you agree that the preferred option should be to verify identities digitally, using a leading technological solution? Please give reasons.

Q5. Are there any other issues the government should take into account to ensure the verification process can be easily accessed by all potential users?

Q6. Do you agree that the focus should be on direct incorporations and filings if we can be confident that third party agents are undertaking customer due diligence checks? Please give reasons.

Q7. Do you agree that third party agents should provide evidence to Companies House that they have undertaken customer due diligence checks on individuals? Please give reasons.

Q8. Do you agree that more information on third party agents filing on behalf of companies should be collected? What should be collected?

Q9. What information about third party agents should be available on the register?

Who identity verification would apply to and when

Q10. Do you agree that government should (i) mandate ID verification for directors and (ii) require that verification takes place before a person can validly be appointed as a director? Please set out your reasons

Q11. How can verification of People with Significant Control be best achieved, and what would be the appropriate sanction for non-compliance?

Q12. Do you agree that government should require presenters to undergo identity verification and not accept proposed incorporations or filing updates from non-verified persons? Please explain your reasons.

Q13. Do you agree with the principle that identity checks should be extended to existing directors and People with Significant Control? Please give reasons.

Requiring better information about shareholders

Q14. Should companies be required to collect and file more detailed information about shareholders?

Q15. Do you agree with the proposed information requirements and what, if any, of this information should appear on the register?

Q16. Do you agree that identity checks should be optional for shareholders, but that the register makes clear whether they have or have not verified their identity? Please give reasons.

Linking identities on the register

Q17. Do you agree that verification of a person's identity is a better way to link appointments than unique identifiers?

Q18. Do you agree that government should extend Companies House's ability to disclose residential address information to outside partners to support core services?

Reform of the powers over information filed on the register

Q19. Do you agree that Companies House should have more discretion to query information before it is placed on the register, and to ask for evidence where appropriate?

Q20. Do you agree that companies must evidence any objection to an application from a third party to remove information from its filings?

Reform of company accounts

Q21. Do you agree that Companies House should explore the introduction of minimum tagging standards?

Q22. Do you agree that there should be a limit to the number of times a company can shorten its accounting reference period? If so, what should the limit be?

Q23. How can the financial information available on the register be improved? What would be the benefit?

Clarifying People with Significant Control exemptions

Q24. Should some additional basic information be required about companies that are exempt from People with Significant Control requirements, and companies owned and controlled by a relevant legal entity that is exempt?

Dissolved company records

Q25. Do you agree that company records should be kept on the register for 20 years from the company's dissolution? If not, what period would be appropriate and why?

Public and non-public information

Q26. Are the controls on access to further information collected by Companies House under these proposals appropriate? If not, please give reasons and suggest alternative controls?

Information on directors

Q27. Is there a value in having information on the register about a director's occupation? If so, what is this information used for?

Q28. Should directors be able to apply to Companies House to have the "day" element of their date of birth suppressed on the register where this information was filed before October 2015?

Q29. Should a person who has changed their name following a change in gender be able to apply to have their previous name hidden on the public register and replaced with their new name?

Q30. Should people be able to apply to have information about a historic registered office address suppressed where this is their residential address? If not, what use is this information to third parties?

Q31. Should people be able to apply to have their signatures suppressed on the register? If not, what use is this information to third parties?

Compliance, intelligence and data sharing

Q32. Do you agree that there is value in Companies House comparing its data against other data sets held by public and private sector bodies? If so, which data sets are appropriate?

Q33. Do you agree that AML regulated entities should be required to report anomalies to Companies House? How should this work and what information should it cover?

Q34. Do you agree that information collected by Companies House should be proactively made available to law enforcement agencies, when certain conditions are met?

Q35. Should companies be required to file details of their bank account(s) with Companies House? If so, is there any information about the account which should be publicly available?

Other measures to deter abuse of corporate entities

Q36. Are there examples which may be evidence of suspicious or fraudulent activity, not set out in this consultation, and where action is warranted?

Q37. Do you agree that the courts should be able to order a limited partnership to no longer carry on its business activities if it is in the public interest to do so?

Q38. If so, what should be the grounds for an application to the court and who should be able to apply to court?

Q39. Do you agree that companies should provide evidence that they are entitled to use an address as their registered office?

Q40. Is it sufficient to identify and report the number of directorships held by an individual, or should a cap be introduced? If you support the introduction of a cap, what should the maximum be?

Q41. Should exemptions be available, based on company activity or other criteria?

Q42. Should Companies House have more discretion to query and possibly reject applications to use a company name, rather than relying on its post-registration powers?

Q43. What would be the impact if Companies House changed the way it certifies information available on the register?

Q44. Do you have any evidence of inappropriate use of Good Standing statements?