#together

COMPANY DIRECTORS DIGITAL ID "TOOLKIT"

What can Directors who want to AVOID the Government's "One Login" system do?

Disclaimer:

This document is provided on a best efforts basis as a general guide only and does not constitute legal advice. While every effort has been made to ensure accuracy at the time of writing (September 2026), laws and regulations may change, and the information may not reflect the latest legal requirements or apply to your specific circumstances. You should seek independent legal or professional advice before relying on this material. Use at your own risk.

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Part 1: Introduction: What is happening, and who is affected?

What is happening:

- Starting 18 November 2025, Companies House is beginning a 12 month phase-in of mandatory identity verification for company directors, people with significant control (PSCs), and members of LLPs (Limited Liability Partnerships), under the Economic Crime and Corporate Transparency Act 2023
- See the info page here: https://www.gov.uk/government/news/companies-house-confirms-identity-verification-rollout-from-18-november-2025

Who is affected:

- Existing directors, PSCs, and LLP members will need to complete identity verification during a 12-month transition period beginning on 18 November 2025.
- All new directors, PSCs, and LLP members appointed after 18 November 2025 must verify their identity before their appointment can be registered.

How and when verification is supposed to happen:

- For most existing directors, verification will be linked to your company's next confirmation statement ("annual statement") filed after 18 November 2025.
- This means your specific deadline will depend on your company's existing filing schedule.
- **To find your specific deadline as a director, the easiest way is to search the Companies House website for yourself at: https://find-and-update.company-information.service.gov.uk/**
- **Click on your record, and look for "Identity verification due"**
- **If you are a director of multiple companies, check the "Identity verification due" date for each appointment. You only need to verify your identity once, but you must provide the same personal code to Companies House for each directorship at the appropriate time.**
- According to the Government website, "Your confirmation statement is due usually a year after either: the date your company incorporated (or) the date you filed your last confirmation statement… You can file your confirmation statement up to 14 days after the due date."
- From 18 November 2025, Companies House will not accept a company's confirmation statement unless all its directors have verified their identities. The personal code for

each director must be provided when the confirmation statement is filed. Directors can verify either:

a) via One Login; or
b) via an Authorised Corporate Service Provider (ACSP).

- There is great concern that requiring directors to verify their identity via One Login, uploading a passport or driving licence, and receiving a persistent code linking them to their company record amounts to a state-controlled digital ID in practical terms.
- One Login also appears to pose major security risks, potentially exposing millions of directors' sensitive data as a result of this "roll out," with serious security failings widely reported in the media.

Using an ACSP

- For directors who wish to remain compliant with the new rules while avoiding One Login, an ACSP can verify their identity on Companies House's behalf. How the subsequent confirmation statement is filed is a separate question, which we explain below.
- <u>While we do not believe directors should be forced down the ACSP "route", it may offer a practical short-term way to avoid One Login, particularly if you already engage an accountant.</u>
- ACSPs are regulated professionals and often include:
    - Accountants
    - Solicitors
    - Company formation agents
    - Chartered secretaries
- If you already use an Accountant for your business, there is a good chance they are registered as an ACSP (note: they do *have* to register with Companies House to become an ACSP - it is not automatic).

What could happen if you do not comply?

Companies House says it will take a proportionate approach to enforcement and will generally seek to inform, guide and encourage people to comply before escalating action. However, failure to meet the new identity verification requirements is a legal offence.

If a director does not comply with the identity verification requirements by their deadline, Companies House may send a default notice explaining the breach and warning that enforcement action may follow. Depending on the circumstances, Companies House can use a range of enforcement powers, including:

- financial penalties;

- prosecution through the courts;
- referral to the Insolvency Service;
- director disqualification in serious cases;
- annotations on the public register; and
- other enforcement action available under company law.

A director who continues to act after their identity verification deadline without complying with all the requirements may be committing an offence. The company may also be in breach.

Separately, a company must still file its confirmation statement on time. Companies House says a company that fails to do so may face a financial penalty, may be struck off the register, and those responsible for the company can face prosecution. GOV.UK states that failure to file a confirmation statement can result in a fine of up to £5,000 and the company being struck off.

Companies House's newer financial penalty regime also allows the Registrar to issue penalties where relevant offences have been committed. Current published penalty bands range from £250 for a first minor offence to £2,000 for repeated very serious offences, with the level depending on the offence and previous non-compliance.

The practical message is simple: it would be unwise to ignore the requirement. If you want to avoid One Login, use the ACSP route and make sure you complete the necessary steps before your deadline.

Part 2: Practical Steps & Templates for Directors

Step 1: First Thing You Should Do - Find Out When YOUR Personal Deadline Is

As explained above, this is being phased in over 12 months.

- **To find your specific deadline as a director, the easiest way is to search the Companies House website for yourself at: https://find-and-update.company-information.service.gov.uk/**

- Click on your record, and look for “Identity verification due”

- If you are a director of multiple companies, check the “Identity verification due” date for each appointment. You only need to verify your identity once, but you

must provide the same personal code to Companies House for each directorship at the appropriate time.

Step 2: Next - Notify Your Accountant (If You Have One)

The next practical step is to alert your accountant (if you have one) to your position regarding One Login.

Note there are two versions of template email provided: “stronger” or “softer” in tone to suit your preference.

STRONGER VERSION

SUBJECT: Objection to “One Login” Digital Identification for Directors

Dear [Accountant’s Name],

I hope you’re well.

I’m writing to make my position clear regarding the upcoming Companies House identity verification rules which took effect from 18 November 2025, which effectively requires large numbers of company directors filing confirmation statements to verify their identity through the GOV.UK One Login system.

I understand that in practice, this would mean uploading official documents such as a passport or driving licence to a government-controlled platform, which then assigns each director a persistent digital identifier linked to their company record. Despite official claims to the contrary, this appears to be - by any common-sense definition - a state-controlled digital ID system introduced by stealth. This is at the very time we are seeing a clear majority of the public reject proposals for compulsory (or de facto compulsory) digital ID.

I’m strongly opposed to this policy for directors. It represents an unnecessary and risky expansion of government data collection, built on a system (One Login) already associated with very serious security failures. I am particularly concerned about the potential consolidation of personal data within a single digital profile and login system across multiple government services. Centralising data in this way greatly increases the risk of large-scale cyberattacks, unauthorised access, and identity theft.

It is also concerning that David Davis MP has written to the National Audit Office demanding an urgent investigation after an exercise revealed the One Login system *may already have been compromised without detection* and potentially contain malware. ITV News reported on this in December.

Forcing millions of directors to use a system operating in this “grey area” of compliance and insecurity is, in my view, reckless and unjustified.

I want to be absolutely clear that I do not consent to being enrolled in the One Login system and intend to resist any attempt to make participation a condition of company directorship.

Please take this into account when handling any filings or compliance matters on my behalf, and let me know how your firm plans to approach this issue for clients. This affects not only me but potentially millions of other directors and small business owners across the UK.

Best regards,
[Your Full Name]
[Your Company Name]
[Your Contact Details]

SOFTER VERSION

SUBJECT: Concerns Regarding “One Login” Digital Identification Requirements for Directors

Dear [Accountant’s Name],

I hope you’re well.

I’m writing to make my position clear regarding the upcoming Companies House identity verification rules, which took effect from 18 November 2025. Under these changes, huge numbers of company directors filing confirmation statements are being steered to verify their identity through the GOV.UK One Login system.

I understand this involves uploading official documents, such as a passport or driving licence, to a government-controlled platform, which then assigns each director a persistent digital identifier linked to their company record. While officials claim that this is not a digital ID system, in practice it functions in a similar way, and it comes at a time when there is widespread public opposition to compulsory digital ID schemes.

I have huge concerns about this policy. It represents a significant expansion of government data collection, relying on a system that is facing well-documented and serious security issues. I am particularly concerned about the consolidation of personal data within a single digital profile and login system across multiple government services, which may increase the potential risks of cyberattacks, unauthorised access, and identity theft.

It is also noteworthy that One Login reportedly lost its official certification under the Digital Identity and Attributes Trust Framework (DIATF) in May 2025. In addition, David Davis MP has written to the National Audit Office requesting an urgent investigation after an exercise suggested that the One Login system may already have been compromised without detection and could potentially contain malware. ITV News reported on this in December. Given these issues, I would prefer not to participate in a system that is currently operating in a “grey area” regarding security and compliance.

Accordingly, I do not consent to being enrolled in the One Login system and would prefer to avoid any reliance on it for statutory filings.

Please take this into account when handling any filings or compliance matters on my behalf, and I would welcome your advice on how your firm plans to support clients in light of these changes. This is an issue that will potentially affect millions of directors and small business owners across the UK.

Best regards,
[Your Full Name]
[Your Company Name]
[Your Contact Details]

Step 3: Identify Your Situation

Use the table below to determine:

1. Your accountant/owner type
2. Typical scope of their work
3. Likelihood they can handle the confirmation statement

Situation	Accountant / Owner Type	Typical Scope	Likelihood Your Accountant Handles	What To Do To Stay Compliant Without Using “One Login” Yourself

			Confirmation Statement	
A	Micro-business owners / self-managed	Do all bookkeeping, tax returns, filings themselves	0 - 20%	Engage an **accountant or corporate service provider** to handle the confirmation statement; set up an annual reminder and authorize them to file on your behalf.
B	DIY accountant access / cloud bookkeeping	You maintain records; accountant reviews and files tax	30 - 50%	Subscribe to their **compliance/filing add-on** or ask them to handle Companies House filings directly.
C	Tax-only / ad-hoc services	Annual accounts, corporation tax, tax advice	20 - 40%	Instruct your accountant explicitly to **file the confirmation statement** as a separate service; schedule it annually.
D	Monthly bookkeeping + VAT only	Bookkeeping, VAT returns, possibly payroll	50 - 60%	Ask your accountant to **add an annual compliance package** or instruct them to file the confirmation statement each year.
E	Full-service / annual compliance	Bookkeeping, VAT, payroll, annual accounts, corporation tax, company secretarial filings	80 - 95%	Confirm with your accountant that **all Companies House filings are included**; have them submit on your behalf.
F	Corporate-servi	Companies	90 - 100%	Ensure all your

	ce / multi-company package	House filings, secretarial services, complex structures		companies and LLPs are included; the provider will **submit filings automatically** - just verify completion.

Step 4: Use The Appropriate Template Below To Ask An Accountant Or ACSP To Help You Avoid One Login

An ACSP can verify your identity without necessarily filing your confirmation statement. Depending on your circumstances, you may want them to carry out the identity check only, or also ask them to handle the subsequent Companies House filing.

Note: If you need to find an ACSP, Companies House has an incomplete list here: https://www.gov.uk/government/publications/list-of-authorised-corporate-service-providers-acsps

Situation A - Micro-business owners / self-managed

Subject: Assistance with Annual Confirmation Statement & Compliance Guidance

Hi [Accountant's Name],

I handle most of my bookkeeping and tax returns myself, but I need assistance with filing my company's annual confirmation statement.

I am concerned about the privacy and security implications of using the Government's One Login system. Centralising sensitive personal and corporate identity data increases the risk of breaches or misuse, and the platform has been criticised for poor oversight and lack of public consultation. For these reasons, I do not intend to use One Login.

Could you advise on how I can remain fully compliant with Companies House filings without using this system, and confirm if you can handle the confirmation statement on my behalf?

Thank you,
[Your Name]

[Company Name]

Situation B - DIY accountant access / cloud bookkeeping

Subject: Filing Confirmation Statement & Privacy Guidance

Hi [Accountant's Name],

I maintain my accounts in [Cloud Software], and you usually review and file taxes. I need help ensuring that the annual confirmation statement is filed correctly.

I am concerned about the privacy and security implications of the Government's One Login system. Centralising identity data creates risks of breaches, misuse, and potential function creep, and the system has received criticism for poor oversight. I do not intend to use One Login and need guidance on how to stay compliant without it.

Could you advise whether you can manage the filing for me under these circumstances?

Best regards,
[Your Name]
[Company Name]

Situation C - Tax-only / ad-hoc services

Subject: Confirmation Statement Filing & Compliance Advice Needed

Hi [Accountant's Name],

I'd like to ensure my company's annual confirmation statement is filed properly, and I need guidance on compliance given a specific concern.

I am uneasy about using the Government's One Login system. Centralising sensitive personal and corporate identity data increases risks of misuse, data breaches, and long-term function creep. Given these issues, I do not intend to use One Login. Could you provide a solution to file the confirmation statement while remaining fully compliant without registering for this system?

Thanks,

[Your Name]
[Company Name]

Situation D - Monthly bookkeeping + VAT only

Subject: Annual Compliance Filing & Privacy Concern

Hi [Accountant's Name],

In addition to our usual bookkeeping and VAT work, I want to ensure the annual confirmation statement is filed correctly, given a significant compliance concern.

I am concerned about the Government's One Login system. Centralising identity data increases the risk of breaches or misuse, and oversight has been poor. I do not intend to use One Login and would like your guidance on handling filings while remaining fully compliant without it.

Kind regards,
[Your Name]
[Company Name]

Situation E - Full-service / annual compliance

Subject: Companies House Filings & Privacy Guidance

Hi [Accountant's Name],

I would like to confirm that all Companies House filings, including the annual confirmation statement, are covered, and get your advice on a particular compliance issue.

I am concerned about the Government's One Login system. Centralising sensitive personal and corporate identity data poses privacy and security risks, and the system has received criticism for poor oversight and lack of consultation. I do not intend to use One Login and need assurance that filings can proceed fully compliantly without it?

Best,
[Your Name]
[Company Name]

Situation F - Corporate-service / multi-company package

Subject: Multi-Company Filing & Privacy Compliance Guidance

Hi [Provider's Name],

We have multiple companies/LLPs under your service, and I want to ensure all filings are properly submitted.

I am concerned about the Government's One Login system. Centralising sensitive personal and corporate identity data increases the risk of breaches, misuse, and function creep. Given these concerns, I do not intend to use One Login and need confirmation that our multi-company filings can remain fully compliant without it.

Thank you,
[Your Name]
[Company Group Name]

YOU'VE VERIFIED THROUGH AN ACSP AND RECEIVED YOUR PERSONAL CODE - WHAT HAPPENS NEXT?

Once an ACSP has successfully verified your identity, Companies House will send your personal code directly to the email address you provided to the ACSP.

Your personal code belongs to **you, not your company**. You only need to verify your identity once and you use the same personal code for each company of which you are a director.

If you are an existing director

From 18 November 2025, your personal code must be provided as part of your company's next confirmation statement.

If the company has more than one director, **every director must have verified their identity**, and the personal code for each director must be provided. It does not matter whether the individual directors chose to verify through One Login or through an ACSP.

Companies House will not accept the confirmation statement until all the company's directors have verified their identity.

How can the confirmation statement be filed?

There are several possible routes:

1. Have an accountant or other agent file it for the company

If your accountant or another agent normally deals with your Companies House filings, they can continue to handle the confirmation statement. You will need to give them your personal code if they need it to file on your behalf.

2. File online

Companies House offers online filing for confirmation statements. However, its main WebFiling service now requires users to sign in using One Login.

There is also a separate online confirmation statement service for certain straightforward private companies. This is only available where the company meets specified conditions, including having between one and five officers, no more than five PSCs, only one shareholder, and having already provided the personal codes for all its directors.

However, this should not be assumed to provide a permanent route around One Login. Companies House is moving its account sign-in arrangements to One Login: new users now need One Login to access Companies House services, while existing account holders can continue using their existing sign-in details for the time being.

3. File on paper

If you want a filing route that does not require you to sign in through One Login, you can file a paper confirmation statement using form **CS01**, including the required identity verification information for each director.

However, there is a significant cost difference: Companies House currently charges **£110 to file a confirmation statement on paper, compared with £50 online**.

This may be on top of any fee you have already paid an ACSP to verify your identity.

What if I am a director of several companies?

You do **not** need to verify your identity separately for every company.

You use the same personal code for each directorship, but it must be provided to Companies House for **each appointment** at the appropriate time.

What if I am also a Person with Significant Control (PSC)?

You use the **same personal code**, but your director and PSC roles are treated separately.

PSCs have their own 14-day period in which they must provide their personal code to Companies House. If you were already a PSC before 18 November 2025 and are also a director of the company, this period starts the day after the company's confirmation statement date. If you were already a PSC but are not a director, it generally falls within the first 14 days of your birth month. Different arrangements apply to newly registered PSCs.

So do not assume that providing your code as a director on the confirmation statement automatically completes your PSC requirement.

Together's view

Directors who choose not to use One Login can therefore face additional costs - potentially paying an ACSP to verify their identity and then paying the higher paper filing fee if they also want to avoid One Login when filing.

Together believes there should be a **free, genuinely equivalent alternative**.

Choosing not to use a government digital identity system should not mean paying more or receiving a worse service.

Dealing with a more complex situation: What if your co-directors have already verified through One Login, but you want to use an ACSP instead?

This is not a problem. Directors of the same company do not all have to verify their identities in the same way. Your co-directors can use their personal codes obtained through One Login, while you use the personal code obtained after verification by your ACSP.

<u>1. Choose and engage an ACSP</u>

As above, an ACSP is a third-party agent registered with Companies House and supervised under UK anti-money-laundering rules. These providers are authorised to verify an individual's identity on Companies House's behalf.

What you need to do:

A. Select an ACSP: this could be your accountant, solicitor, company secretary or an external provider that is on the official list of ACSPs.
B. Provide identification documents to them: typically a passport, UK driving licence or other approved photo ID. You may also need proof of address.
C. Agree fees and process: ACSPs usually charge a fee for this service (varies by provider).
D. ACSP undertakes the check using Companies House's verification service, following the same standard (but not mechanism) as the One Login process.
E. Once the ACSP completes the check for you, they submit the verification to Companies House.

2. Receive and manage your Companies House personal code

After your identity is verified via the ACSP route, Companies House will issue you a personal code. This code confirms to Companies House that your identity has been verified.

Once the ACSP has successfully verified your identity, Companies House will send your personal code directly to the email address you provided to the ACSP. You can then:

- Save it in your own records
- Provide it when the confirmation statement is submitted

Important: You need this code for the confirmation statement process even if you don't use One Login.

3. Coordinate with your co-directors

Even though your co-directors have verified via One Login:

- *Their* personal codes (which they received after verifying via One Login) must be included in the confirmation statement.
- You should collect all directors' codes (including the code you received from Companies House after ACSP verification) ahead of filing.
- It's best to share or coordinate so the confirmation statement includes all codes correctly. (Co-directors who verified through One Login can view their personal codes in their

Companies House account; Companies House may also have emailed the code to them.)

4. File the confirmation statement

Once you have collected the required personal codes for all directors, file the company's confirmation statement using one of the filing routes explained above.

5. Tips & common pitfalls

- Ensure all directors' codes are ready before filing
    - If any director lacks a personal code, the confirmation statement can't be accepted
- ACSP fees and timelines
    - ACSP providers charge for their services and may take longer than doing the One Login route yourself, so plan ahead of the filing deadline.

Summary: Your ACSP process

1. Choose an ACSP and provide your ID documentation to them.
2. ACSP verifies your identity with Companies House on your behalf.
3. Receive your personal code from Companies House.
4. Gather all directors' codes (including co-directors who used One Login).
5. File the confirmation statement with each personal code included.

TEMPLATE EMAIL TO YOUR ACSP

Subject: Request for Companies House Identity Verification (ACSP Route)

Dear [ACSP name],

I am a director of [Company Name] (Company Number: [12345678]) and need to complete my Companies House identity verification in order for our company to file its next confirmation statement.

I do not wish to use the GOV.UK One Login route and would like to proceed via the Authorised Corporate Service Provider (ACSP) verification process.

Please confirm:

1. That you are registered with Companies House as an Authorised Corporate Service Provider
2. The documents you require from me for identity verification

3. Your fee and estimated turnaround time
4. How I will receive my Companies House personal code once the process is complete

Once verified, I will need my personal code so it can be included in our upcoming confirmation statement filing.

Many thanks,
[Your full name]
Director – [Company Name]
[Your email]
[Your phone number]

Step 5: Other Actions To Add Pressure

Amongst other things, we are arguing that a free, non-digital alternative should be made available - and publicised - urgently to ensure directors are not compelled into One Login against their better judgment or forced to incur extra costs.

Take action via Together's tools and resources at the campaign page (https://togetherdeclaration.org/directors), including:

- Contact Companies House through our online tool.
- Write to your MP.
- Contact the Institute of Directors.

Part 3: Support and Updates

Together will continue to provide campaign updates and possible solutions as we are able. Please consider joining Together as a member to help protect directors and small business owners: https://togetherdeclaration.org/join

About Together:

Together was formed in 2021 around the need to defeat another intrusive form of state-controlled Digital ID: “vaccine passports.” The original “Together Declaration”, collaborated on by more than 200 organisations, business groups, campaigners and professionals, was signed by over 200,000 members of the public in just weeks and presented to 10 Downing Street. Now a fully-fledged membership organisation, Together is actively campaigning to prevent compulsory (or de facto compulsory) digital ID and to preserve freedom, choice and autonomy.