

ID Verification for CH

what ACSPs need to know

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Poll

Will you be verifying IDs **on behalf of your customers?**

Key objective



**Clarity on the approach of IDV for
Companies House as an ACSP**

Agenda

- **Overview and key dates**
- **Scenarios to prepare for**
- **ID verification methods**
 - CH ID Verification vs ACSP verification
 - Option 1 vs Option 2
- **Training possibilities**
- **Recap of Xama Roadmap**
- **Q&A**

ACSP key dates

MILESTONE	DATE
ACSP registration opens	18 March 2025
Voluntary ID verification begins	8 April 2025
Mandatory IDV for new confirmations and incorporations	18 November 2025
Filing on behalf of others requires ACSP	Spring 2026 (TBC)

CH Personal Code

Personal Code:

- Produced by Companies House
 - In the customer **GOV.UK One Login portal** if IDV is done directly with Companies House
 - **Emailed to an individual** if completed via an ACSP. Client can save this to their GOV.UK One Login account after creating it with the same email

You're signed in as **jacques@xamatech.com**

Identity verification

Companies House X XXXXXXXXXX Copy
personal code

Keep this code safe - only share it with people you trust to file on your behalf.

AML Compliance

We have to also consider **AML compliance** requirements...

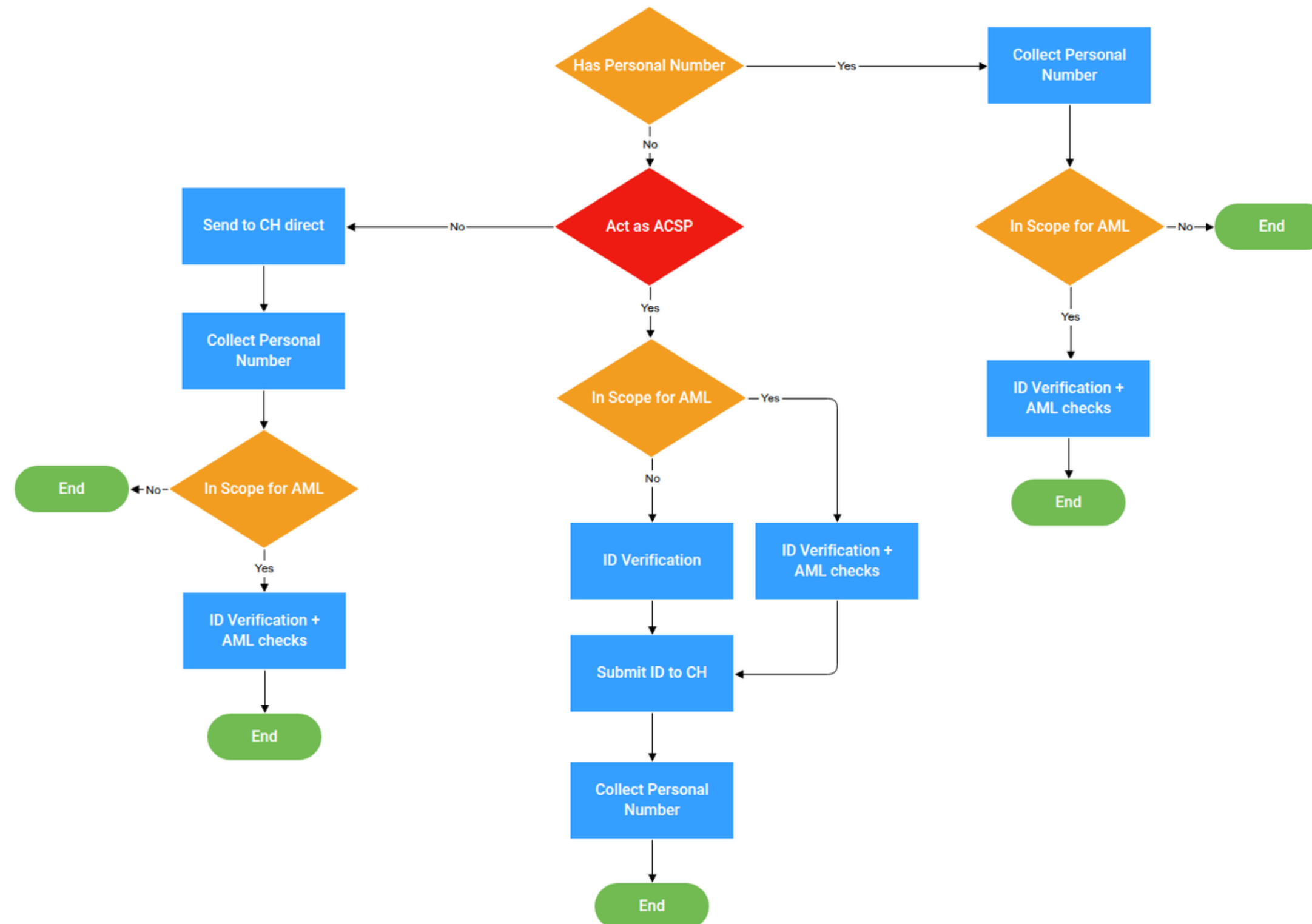
We do not want to create unnecessary **duplication** or miss out on using **existing processes**.

Scenarios to consider

Has Personal Code	Beneficial owner in scope of AML
No	No
No	Yes
Yes	No
Yes	Yes

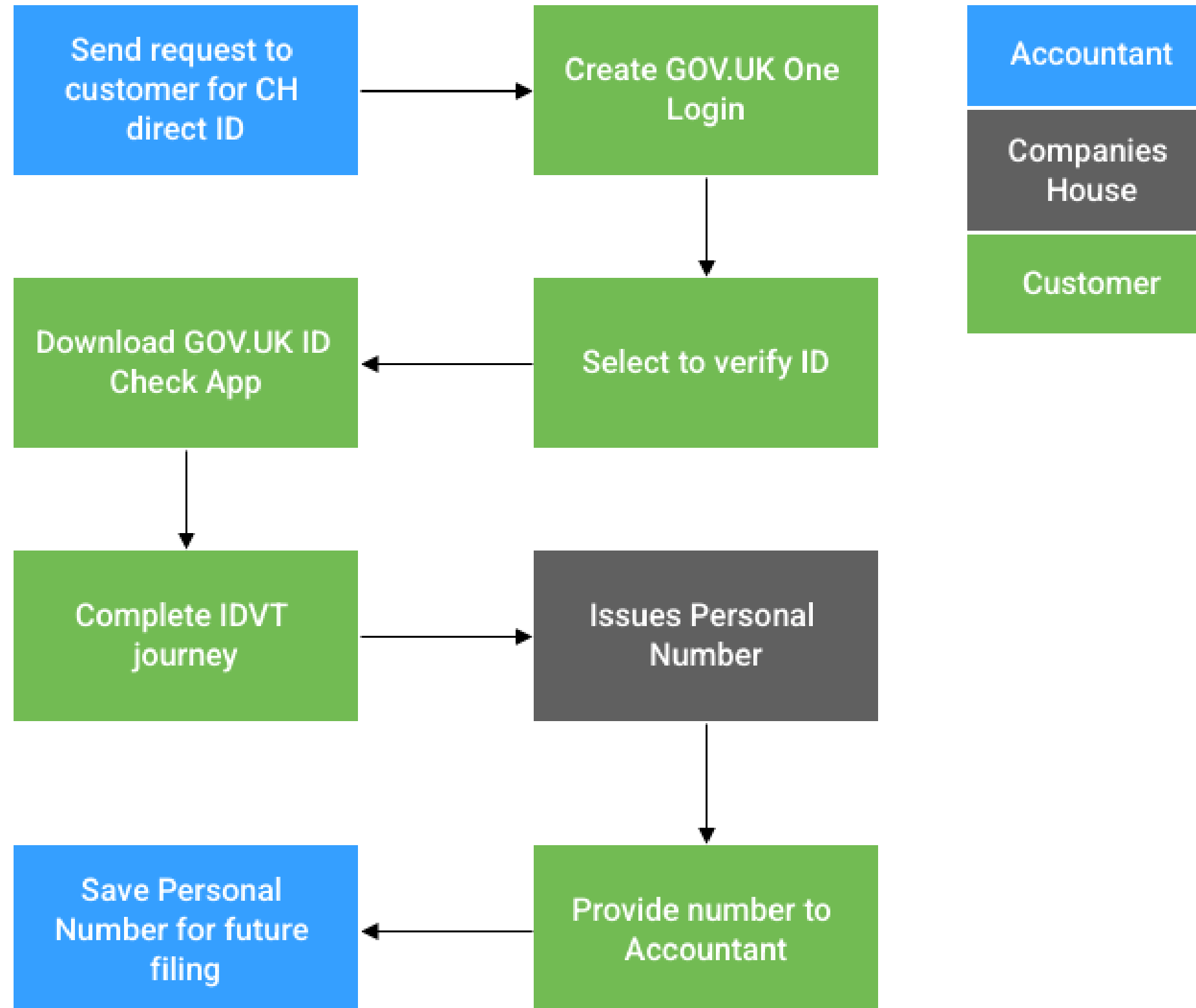
Scenarios to consider - workflow

Workflow for CH and AML requirements

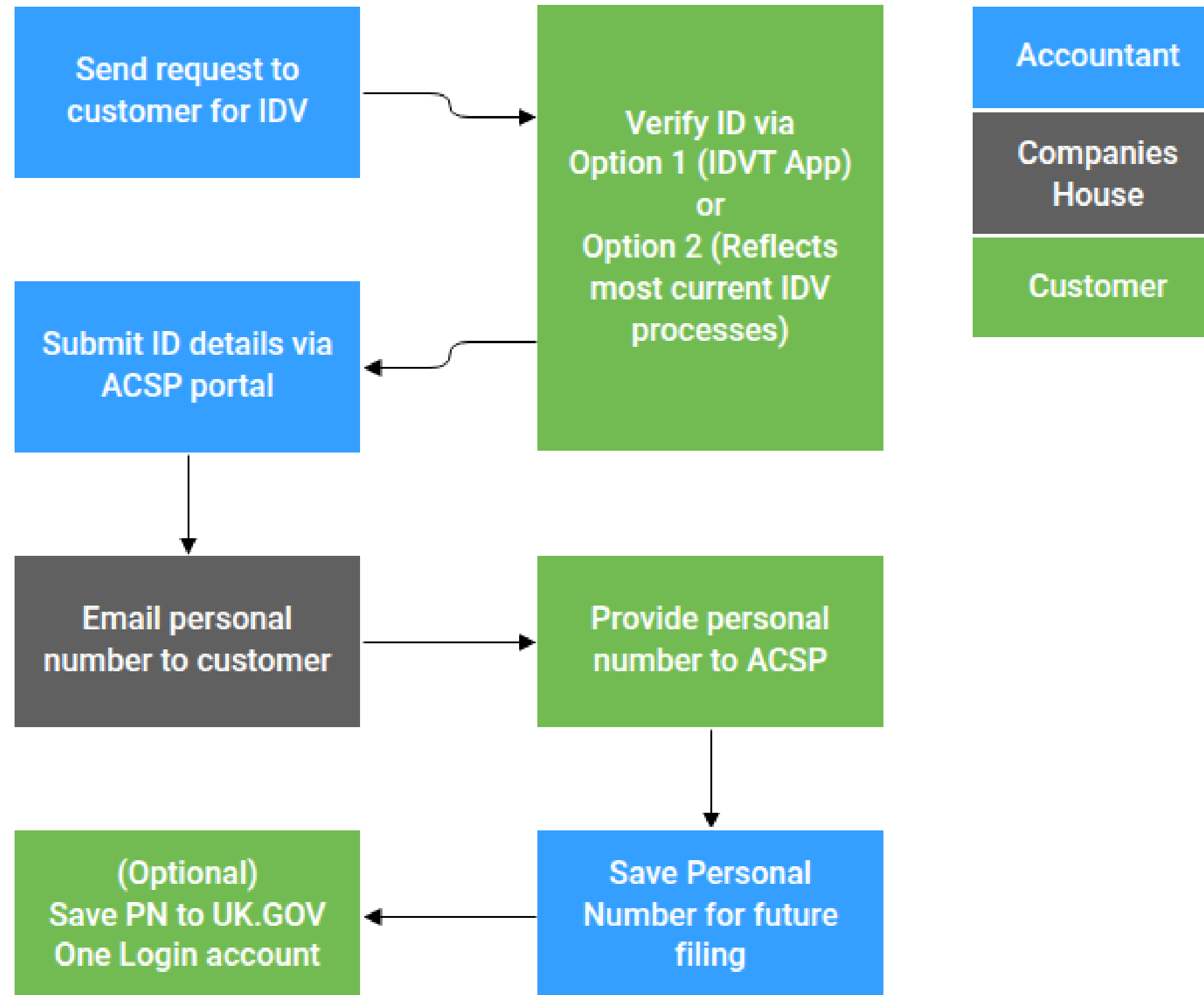


Generating a Personal Number

Customer directly with CH



ACSP Route



Comparing CH direct vs ACSP

CH Direct	ACSP
Fully outsourced - no risk or cost of IDVT	Easier to track customer progress and incorporate into firm workflows
Limitation of GOV.UK One Login might result in diverting to post office verification	Supporting customers who cannot navigate Companies House or GOV.UK One Login app
Personal number automatically stored in GOV.UK One Login account	Reduce bottle necks and delays by using existing identities and documents - reduce duplication of IDV

ACSP Route - 2 Options

Options for IDV - ACSP route

ACSP Option 1	ACSP Option 2
Mirrors CH Direct route	ACSP facilitates IDV through a flexible combination of document and technology based solutions
No human judgement allowed - relies 100% on technology	Human judgement and training combined with support from IDVT

IDVT example



Google Play and Apple Store
Demo



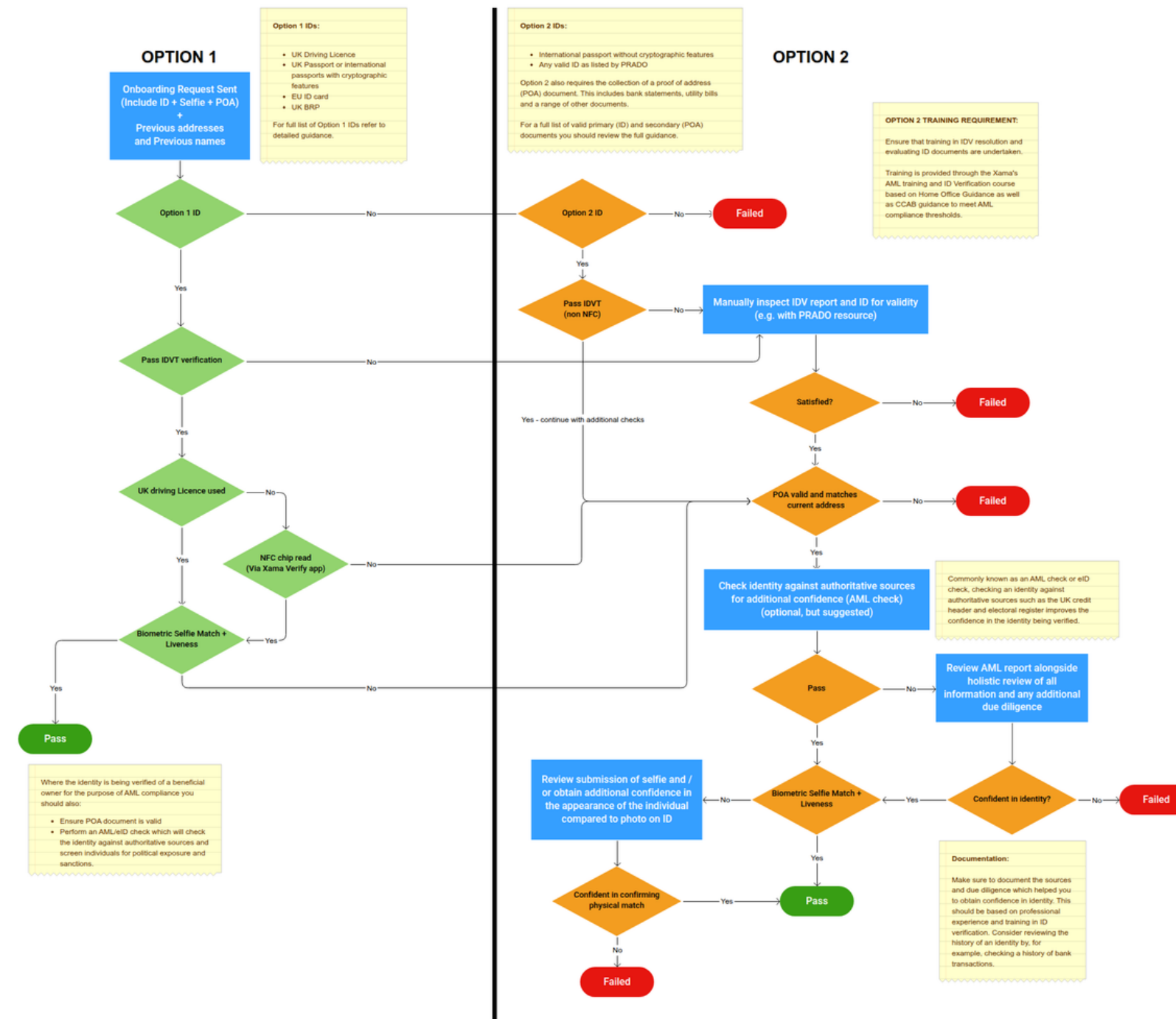
CH and Option 1 pitfalls

Pitfalls	Description
Documents	Requires Passports with cryptographic features (electronic chip) or UK driving licence (other documents too - but the list is limited)
Technology	IDVT technology does not have a 100% pass rate. Various reasons, could cause a result that is not a definitive pass.
Accessibility	Whether it is a disability, unfamiliarity with technology or restrictions on app installations on a device, there are various reason CH or Option 1 might not be accessible to all

**You process is only as strong as the
weakest link**

Flexible IDV using Option 1 and 2

USING ONBOARDING REQUESTS TO INITIATE ID VERIFICATION - MEETING COMPANIES HOUSE STANDARD



More about this diagram:

The Companies House standard for ID verification provides two options for verifying identities. These two options are demonstrated within this diagram.

- Option 1** relies entirely on IDVT (Identity Document Validation Technology), with little or no manual intervention or review required.
- Option 2** provides an alternative route, typically used for a wider range of identity documents or in cases where IDVT technology has not been able to reach a definitive conclusion based on the images and cryptographic features provided.

It is also important to note that while Option 1, if successful, meets the Companies House standard, parts of Option 2—such as verifying address information through a proof of address document or via an electronic ID (eID/AML) check—may still be required to meet the threshold for AML compliance.



Final thought on Option 2

If you prepare your firm to use Option 2 as a viable backup to CH Direct and Option 1...

How can Option 2 be utilised to further streamline the process in preference of CH Direct and Option 1.

Does it make sense to use Option 2 as the preferred option?

Option 2 training requirement

Step 3: Check the evidence is real

If the evidence is being checked by a person, they must be trained in detecting false documents and be familiar with the [guidance on examining identity documents to detect basic forgeries](#). Companies House cannot recommend any specific training providers but they must follow the Home Office best practice guide.

Additional Training and Guidance

Source	Description
AML Compliance Training (Xama AML Academy)	Training for those involved with CDD includes IDV best practice training
Webinars	We regularly do webinars covering good practice
Xama IDV training	Recorded IDV course on Home Office guidance
Our ACSP guidance	Regularly updated with updated guidance and specific focus on meeting CH following good practice with flow diagrams, checklist and additional guidance

More information on accessing guidance and training will be shared in a follow up email

Q&A

(ps. no such thing as a silly question)

