



Department for
Business, Energy
& Industrial Strategy

Lord Henley PC
Parliamentary Under-Secretary of State

Department for Business, Energy & Industrial
Strategy
1 Victoria Street
London
SW1H 0ET

Lord Campbell-Savours
House of Lords
London SW1A 0PW

T +44 (0) 20 7215 5000
E enquiries@beis.gov.uk
W www.gov.uk

18 April 2018

Further to the debate on the draft Companies (Disclosure of Address) (Amendment) Regulations 2018 on Monday 16th April 2018 I am writing as promised about points which you raised.

You asked why the companies register will show the first half of the postcode. In deciding what should be shown on the register in relation to someone who does not have to maintain a current address on the register, our aim has been to strike an appropriate balance between protecting that person from harm whilst still providing some information from that historic record to those who search the register.

Retaining the first half of the postcode on the companies' register will provide the area where the applicant was based, while protecting their residential address. It would not be appropriate to retain the full postcode as this would make it easier to identify where an individual lived and would not provide suitable protection.

Fully suppressing the residential address would remove all trace of where a person was based and may make it more difficult for searchers to check whether they have been involved in other companies, particularly where the director has a common name. We consider that the partial suppression of the residential address provided for by the 2018 Regulations strikes the right balance between protection and transparency.

You also asked why the police form a special category of persons in the legislation. In addition to what was the focus of these amendment regulations, the Companies (Disclosure of Address) Regulations 2009 also allow applications for higher protection which prevent the Registrar from disclosing residential address information to credit reference agencies. The Explanatory Memorandum to the 2009 Regulations state that "Following discussions with the security services, the policy is also that employment by one of the security services or the police should also be grounds for higher protection" (paragraph 7.12).

The 2018 Regulations do not change this position but merely seek to close a potential loophole which could frustrate the original policy intent of the 2009 Regulations. As I mentioned during the debate, it would be a matter for police constables themselves to consider whether they would wish to make an application for higher protection.

I am copying this letter to Lord Stevenson of Balmacara and Lord Fox and a copy will be placed in the House of Lords Library.

*you are
Peter*

Rt Hon Lord Henley