



GOVERNMENT WHIPS' OFFICE

HOUSE OF LORDS

LONDON SW1A 0PW

FROM THE LORD LEONG

GOVERNMENT WHIP DBT, DSIT

020-7219 3778

Telephone 020-7219 3131

www.lordswhips.org.uk

holgovernmentwhips@parliament.uk

6 August 2025

Dear Chris,

You may recall the SI debate on the 13 January for the Registrar (Identity Verification and Authorised Corporate Service Provider) Regulations 2025 and the Unique Identifiers (Application of Company Law) Regulations 2025. These regulations since came into force in March this year.

I want to offer my sincere and profuse apologies for the delay in following up with the additional details I promised during January's debate. I deeply regret not getting back to you sooner and hope you will accept my apology.

Authorised Corporate Service Providers ("ACSPs")

During the debate, you asked why there is a need for ACSPs. The creation of ACSPs was agreed by Parliament during passage of the Economic Crime and Corporate Transparency Bill (now Act). It is important not to undermine the established role of legitimate third parties such as lawyers and accountants who interact with Companies House on behalf of their clients. Equally it is important to address the known risk of professional enablers in facilitating economic crime. ACSPs will support both these ambitions by adding a layer of protection to Companies House filings whilst ensuring legitimate firms can continue to provide their services to clients.

ACSP suspension and deauthorisation process

You also asked about the process for suspending or deauthorising ACSPs and whether there was any right to appeal against such a suspension. An ACSP must be supervised under UK Anti-Money Laundering regulations at all times, and Companies House and the supervisors will regularly share intelligence and changes to an ACSP's supervisory status. If the ACSP ceases to be supervised they will automatically cease to be an ACSP. Additionally, Companies House can suspend or

deauthorise an ACSP if they think they are no longer fit and proper to perform these functions.

The ability to quickly suspend and deauthorise (or “cease”) an ACSP following intelligence received or the identification of suspicious activity will greatly reduce the impact of the fraudulent behaviour.

Following the identification of suspicious activity, the registrar may issue a suspension notice, which will include the intention to issue a cessation notice after 28 days, the reason why cessation is intended and how to object. The Registrar will publish notice of the suspension and notify the supervisory authority. The ACSP will not be able to perform any of its ACSP related functions during this period. After the expiry of 28 days, the registrar may issue a notice of cessation after taking into account any objections that were made during the 28-day period. The registrar will then publish notice of the cessation and notify the supervisory authority.

An ACSP is able to object to its suspension throughout the 28-day period, and the registrar must consider any objections that have been made before determining if cessation is appropriate. No appeals process is set out in law, but Companies House intend to allow ACSPs to appeal its cessation through an independent adjudication process, engaged by Companies House. An ACSP will also be able to challenge its cessation via judicial review.

ACSP records and transferring ownership

You also asked questions relating to the records an ACSP must keep, and their rights to transfer ownership. I am uncertain of the exact context of your question relating to transferring ownership, however it may be helpful to clarify an ACSP is required to be supervised for Anti-Money Laundering purposes at all times. When an ACSP is a firm, and it is the firm itself that is supervised, it is free to change its directorships. It would be unable to transfer its ACSP status to a different firm. If an individual is supervised, such as a sole trader ACSP, the account cannot be transferred to a different individual. A new ACSP account will be needed in the name of the new supervised owner.

ACSPs will be required to keep data related to identity verification checks they have completed for seven years from the date they undertook the check. Failure to comply will be a criminal offence which could result in imprisonment or a fine (or both).

When an ACSP confirms that they have verified a client's identity, they will be required to provide to Companies House a description of the evidence they relied on to verify the identity, which could include, for instance, passport numbers. Companies House will not by default collect other data related to the identity checks, however they are empowered to request that the ACSP provide this data if necessary to confirm that the ACSP is complying with requirements.

Use of unique identifiers

Finally, you asked if unique codes will be used for other purposes in categorising companies or if they will be used discretely by Companies House only in this activity. Unique identifiers are personal codes issued by Companies House to individuals who have verified their identity and to registered ACSPs. They are a key part of the identity verification mechanism to enable Companies House to correctly identify individuals and ACSPs. Unique identifiers will allow one individual's appointments across the register to be linked. They will also eventually be linked to filings so Companies House knows who is filing what. They will be used only by Companies House and will not be made publicly available or used elsewhere.

Future parliamentary engagement

There is a statutory requirement to lay before the House an annual report on the implementation and operation of parts 1-3 of the Economic Crime and Corporate Transparency Act. This year's report was published in June and can be found here - [Second progress report on the implementation and operation of Parts 1 to 3 of Economic Crime and Corporate Transparency Act 2023](#) The regulations debated in January also contain a requirement to undertake a Post Implementation Review to assess the effectiveness of these measures within five years after they come into force.

I hope this will provide Parliamentarians with the opportunity to scrutinise the implementation of these significant reforms.

Once again, sincere apologies for the delay in responding to the helpful comments you provided during the January debate. If you have any further questions, please do get in touch. My officials and I stand ready to provide answers to any questions you may have.

I will place a copy of this letter in the library of the House.

Yours Sincerely,

A handwritten signature in black ink, appearing to be 'Leong', with a long, sweeping horizontal stroke extending to the right.

LORD LEONG CBE