Companies House logo

Cardiff
Belfast
Edinburgh
London

Driving confidence in the UK economy.
Companies House is an executive agency, sponsored by the Department for Business, Energy & Industrial Strategy.

|  |
| --- |
|  |
| Request for Information  Identity Verification  6th October 2022 |
|  |

# Invitation

We would like to notify you of an upcoming requirement, and by doing so we are keen to understand where the market stands in terms of our requirement below.

This Request for Information (RFI) seeks information relating to Identity Verification by Companies House.

Please note the following general conditions:

* This RFI will help us to refine the requirements.
* Information contained within this document is confidential and must not be revealed to any third party without prior written consent from us.
* No down-selection of Potential Providers will take place as a consequence of any responses or interactions relating to this RFI.
* We expect that all responses to this RFI will be provided by Potential Providers in good faith to the best of their ability in the light of information available at the time of their response.
* No information provided by a Potential Provider in response to this RFI will be carried forward, used, or acknowledged in any way for the purpose of evaluating the Potential Provider, in any subsequent formal procurement process.
* Any and all costs associated with the production of such a response to a RFI must be borne by the Supplier. We will not contribute in any way to meeting production costs of any response.

**INFORMATION REQUESTED**

Companies House would like to invite suppliers with the relevant experience to meet with the project team and deliver responses to the questions below in person. These Q&A sessions will be held at Companies House offices in Cardiff (Companies House Crown Way, Cardiff, CF14 3UZ). We will hold sessions week starting 17th October.

Please email **Claire Mace** at [**cmace@companieshouse.gov.uk**](mailto:cmace@companieshouse.gov.uk)

# Background

**Companies House**

Companies House is the custodian of the register of companies in the UK. We register company information, incorporating and dissolving limited companies, enabled via our digital services. We make company information available to the public.

More than 4.8 million limited companies are registered in the UK. Over 600,000 new companies are incorporated each year.

Our strategic goal is to drive confidence in the UK economy. We aim to achieve this through better use of the data we collect and make available for consumption by multiple entities across the UK. The information on the register is searched billions of times a year to support the making of millions of business decisions and is also used every day by UK and overseas law enforcement, by civil society, and by citizens.

Currently, our main responsibilities are to:

* incorporate and dissolve limited companies
* examine and store company information
* make information available to the public

**Legislative reform**

On 28 February 2022, our parent agency BEIS (Department for Business Energy and Industrial Strategy) published a White Paper on “[Corporate transparency and register reform”,](https://www.gov.uk/government/publications/corporate-transparency-and-register-reform) which includes 58 proposed reforms of the UK company regime intended to “help safeguard our national security, reduce the economic and social costs of fraud, and deliver real benefits to the whole business community”.

An outcome of the paper was the introduction of The Economic Crime and Corporate Transparency Bill, introduced to parliament on 22 September 2022. The resulting Act will enable Companies House to play a much broader role in tackling economic crime and improving corporate transparency.

The statutes include:

* anyone setting up, running, owning or controlling a company in the UK will need to verify their identity with Companies House
* Companies House will be given the power to challenge suspicious information, and to inform security agencies of potential wrongdoing
* company agents from overseas will no longer be able to create companies in the UK on behalf of foreign criminals
* the quality of information provided to Companies House will be improved, so that companies who rely on it to make business decisions can trust who they are doing business with
* filing processes for small businesses will be streamlined and digitised
* company directors will be better able to protect personal information published by Companies House which might put them at risk of fraud or other harm

The reforms to Companies House are the biggest changes in 170 years and are eagerly anticipated by campaigners and stakeholders.

# Objective

**This Request for Information (RFI) is aimed at verification solution providers to potentially work with Companies House in providing a solution to capture and manage identity information. This RFI is to source information and help share future activities within the project.**

As part of Legislative reform, it is anticipated that Individuals who register companies or file with the Registrar will have to prove they are who they say they are by verifying their identity. This will make it much harder to register fictitious directors or beneficial owners, helping to prevent fraudulent appointments from reaching the Companies House register.

Identity verification will be a simple, quick process without significantly adding to the existing pressures on the business. Businesses of all sizes will benefit from greater assurance from the Companies House register when they are sourcing information on which to base business decisions.

This will apply to existing directors, People with Significant Control, and those delivering documents to the Registrar. Companies already on the register will have a transition period in which to comply with the new method of verification. Identity verification requirements will also apply to all new registered company directors and People with Significant Control.

*It is important to clearly state that the implementation of verification is subject to the ongoing parliamentary process associated with the Economic Crime Bill.* [*Economic Crime and Corporate Transparency Bill - Parliamentary Bills - UK Parliament*](https://bills.parliament.uk/bills/3339)

# Companies House Draft Requirements

Companies House are currently working on requirements for a verification service. Below is a high-level summary. Please note that these requirements remain in draft and are subject to changes as the Legislative Bill proceeds through the parliamentary process.

These requirements have been provided to support potential suppliers in their response to this RFI document.

Companies House is anticipated to require:

1. A verification service **integrated with the internal Companies House** existing IDAM / Account services.
2. A verification service capable of supporting the verification of **approx. 7.25 million individuals over an initial 12-month period**.
3. Those transacting with Companies House can be of **any age**, therefore the verification solution must be able to accommodate this, while still meeting the medium level of assurance. While the legal requirement is that Directors of a company must be 16 or over, a **Person of Significant Control can be any age at all.**
4. Companies House are seeking to achieve a medium level of assurance in the verification of an individual’s identity ([GPG 45](https://www.gov.uk/government/publications/identity-proofing-and-verification-of-an-individual)).
5. After the initial approx. 7.25million individuals have been verified, Companies House will have an ongoing requirement to verify the identities of individuals transacting with them for the first time. This is estimated to be up to approx. 600,000-1m (tbc) new individuals each year. The verification service must be **scalable as the Register size changes over time**.
6. Companies House anticipates verification will be a **‘once and done’** process. However, at times Companies House may wish request ‘re-verification’ of any individual. The verification service should therefore have a process for Companies House to re-trigger the verification process where required.
7. Companies House seeks a verification service which provides **first line support** to individuals who are struggling to navigate the process, alongside more complex cases (such as where an individual is unable to verify, and the provider has exhausted all available routes)
8. Verification will be critical to the operations of Companies House. It is vital therefore that a verification provider can provide **assurance around service availability** and disaster recovery / business continuity plans**.**
9. A key challenge for Companies House is that **anyone,** **anywhere in the world** can transact with us, therefore the verification service must accommodate this (and ensure the same standard of verification is reached). At present Companies House has several hundred thousand registered officers whose usual residential country is not listed as the UK.
10. Companies House are seeking a **digital first solution**, which allows the majority of users to undertake self-service verification, within a matter of minutes. It is anticipated this process could be based around the use of a ‘selfie/video’ and photographic ID.
11. Where individuals are not able to progress through the standard digital route, assisted digital /alternative routes must be provided by the verification provider.
12. Companies House also recognises that not all those undertaking the verification process will have appropriate levels of documented identification, . In these situations, the verification service should be flexible and still support individuals in reaching a medium level of assurance where possible, through alternative methods
13. Companies House are keen to maximise the value of their data, using it to support the tackling of economic crime. We therefore have a requirement to have access to data associated with the verification process. The value of this will be determined by the type of data held, how long for, and how it is accessed.
14. It is imperative that the digital verification journey meets government accessibility standards and allows for tailoring to meet Government Data Services guidelines for website design. The service should also be compliant with the Equality Act 2010 and the Public Sector Bodies (Websites and Mobile Applications) (No.2) Accessibility Regulations 2018. This includes, but is not limited to:

* UI pages must meet WCAG 2.1 level AA standards
* Compatibility with accessibility tools such as screen readers, screen magnifiers, speech recognition software
* Compatibility with a range of browsers

|  |  |  |
| --- | --- | --- |
| Questions | | |
| No. | Topic: | Questions: |
| 1 | About Your Organisation | Provide a summary of your organisation and your experience with identity verification? |
| 2 | Verification Solution | Provide an overview of your verification service / product? Do you have any experience working with other government departments on verification activities? |
| 3 | Verification Solution | What data do you hold about each verification attempt (successful and unsuccessful). Please provide details of what is passed through to the client about the transaction, and what is retained by yourselves as the verification provider? |
| 4 | Verification Solution | Does your service offer fraud detection to identify any fraudulent documents or activity in the verification journey? |
| 5 | Requirements | Review the 14 requirements listed in section 3 of this RFI.  Where possible please explain how/where your organisation could address these? |
| 6 | Requirements | Review the 14 requirements listed in section 3 of this RFI.  What additional information would be beneficial to support a formal response, in the event Companies House were to issue a tender? |
| 7 | Requirements | Do you have any general feedback or concerns regarding the requirements outlined in section 3? |
| 8 | Onboarding | How long from point of contract award does it typically take for your service to be fully deployed and live for a customer? |
| 9 | Onboarding | Provide details about how you typically look to work with customers to onboard them and integrate with your verification services? |
| 10 | Commercial Arrangements | What is the charging model associated with your service? For example:   * Are you able to provide any indicative costs for each verification check performed? * Do costs vary based on how a user chooses to complete the verification process (assisted digital)? * Are you able to provide any indicative costs for the onboarding and integration process? * Are there any ongoing support costs, please provide indicative figures |
| 11 | Commercial Arrangements | What routes to market are available to procure your services? |
| 12 | Commercial Arrangements | Companies House recognises that the deployment of verification will require significant changes to our internal systems and services. We are aware that this integration work could be carried out by an integration partner, independent of the verification solution provider. For example, Companies House could procure a verification service from a supplier, and then work with a separate supplier to conduct integration activities.  We would like to understand the markets appetite to the above, and how this approach could be optimally adopted? |