

## AN UPDATE ON THE NEW PPSN DISCLOSURE REQUIREMENT FOR DIRECTORS OF IRISH COMPANIES

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As highlighted in a previous article, the Companies (Corporate Enforcement Authority) Act 2021 contains a provision requiring all Directors of Irish companies to provide their personal public service number (PPSN) or a Verified Identity number (VIN) when:

- Incorporating a new company (CRO Form A1)
- Filing an annual return (CRO Form B1)
- Notifying a change of director (CRO Form B10)

This new requirement took effect from 11th June 2023. The purpose of the new disclosure requirement is to reduce the risk of identity theft by introducing additional identity validation checks when submitting personal information relating to directors to the CRO, and to improve the accuracy and integrity of the information held by the CRO. A director's unique PPSN will be used for identity validation purposes but will not be publicly available on the CRO website.

### Don't have an Irish PPS Number?

Those who do not have a PPSN will be required to apply to have a VIN issued to them by completing a Form VIF. This form must state the name, date of birth, nationality and address of the director who is applying for the VIN.

The director must solemnly declare this information to be correct and true, and have this declaration verified, witnessed by a notary public and signed. Only one VIF is required in respect of each director. Once this has been processed successfully and a Verified Identity number (VIN) is issued by the Registrar, that number can be used for making future filings for that person.

If an RBO number was previously issued to a director for the purpose of filings with the Central Register of Beneficial Ownership of Companies and Industrial & Provident Societies (RBO), this number will be reclassified as a VIN and it will not be necessary to obtain and provide a separate number in these cases.

### What should I do next?

Given the potential for delays in the initial implementation period, company directors and presenters should act now to ensure that the information associated with directors PPS numbers is consistent with the information held at the CRO or to apply for VIN where needed.

If you are a client who is a director of an Irish company, our company Secretarial Team will be in touch soon or if you would like more information regarding the new requirements, please don't hesitate to contact a member of our Company Secretarial team on [companysecretarial@cavanaghkelly.com](mailto:companysecretarial@cavanaghkelly.com).