



An Roinn Fiontar,  
Turasóireachta agus Fostaíochta  
Department of Enterprise,  
Tourism and Employment

# Public Consultation on proposed changes to the Companies Act 2014 and related legislation

## Response Template

As set out in the Public Consultation paper, the Department of Enterprise, Tourism and Employment is seeking the views of stakeholders and interested parties on proposed changes to the Companies Act 2014 (“the 2014 Act’), in relation to access to the residential addresses of company officers and with similar changes to be reflected in the drafting of the Co-Operative Societies Bill and the Registration of Limited Partnership and Business Names Bill.

Please include your response in the space underneath each question and set out/ explain your views. Completing the template will assist with achieving a consistent approach in responses returned and facilitate collation of responses.

Respondents have the opportunity to comment more generally in the questions at the end of each section should they wish.

When responding please indicate whether you are providing views as an individual or representing the views of an organisation.

<b>Name(s):</b>	██████████ on behalf of Arthur Cox LLP
<b>Organisation:</b>	Arthur Cox LLP
<b>Email address:</b>	██
<b>Telephone number:</b>	██████████

Respondents are requested to return their completed templates by email to [companylawconsultation@enterprise.gov.ie](mailto:companylawconsultation@enterprise.gov.ie) by **5pm on Friday, 19<sup>th</sup> December 2025**.

## Section A: Proposed amendments to the Companies Act 2014

### Implications of the proposed changes for information maintained by companies:

**Question A1:**

**Do you have any views on the intended approach relating to the maintenance by companies of address details of relevant officers?**

**Response:**

We welcome the Department's consultation and support the proposals to reform the disclosure of company directors' and secretaries' residential addresses, including discontinuing the default public availability of relevant officers' "usual residential addresses" in favour of an option to provide a public "contact address" in the State for public record.

However, the continued public availability of residential addresses contained in historic CRO filings constitutes a disproportionate interference with the privacy, security, and personal safety of relevant officers and their family members, co residents, and neighbours. We recommend that the Department consider targeted mechanisms to address legacy disclosures in historic filings. On application by a relevant officer, the CRO should have limited, clearly framed powers to suppress, redact or remove residential addresses from the public record.

**Implications of the proposed changes for filing with the Companies Registration Office:**

**Question A2:**

**Do you have any views on the intended approach relating to the filing with, and maintenance by, the Companies Registration Office of address details of relevant officers?**

**Response:**

We agree with the Department's intended approach whereby, if a relevant officer provides a "contact address," that address is used in CRO filings where appropriate and is the only address displayed on the public record.

**Restricted access to the “usual residential address”:**

**Question A3:**

**Do you have any views on the proposed list of entities that may be granted access to the “usual residential address” of relevant officers?**

**Response:**

We note that it is intended to provide that the Minister prescribe relevant entities, for the purposes of law enforcement, regulatory compliance and judicial proceedings, drawing on the current Tier 1 RBO user cohort to whom disclosure, from the Register of Companies, of the relevant officer’s “usual residential address” should be permitted. We agree with this approach.

We would welcome legislative clarification that service of proceedings may be validly effected at the “contact address”, with an express power for the court to order disclosure of a “usual residential address” where necessary for access to justice and where service at the “contact address” is impracticable or has failed, subject to appropriate safeguards.

**Question A4:**

**Are there any other comments you wish to make on the proposed approach to dealing with the “usual residential address” of relevant officers?**

**Response:**

As noted in our response to Question A1 above, the continued public availability of residential addresses contained in historic CRO filings constitutes a disproportionate interference with the privacy, security, and personal safety of relevant officers and their family members, co-residents, and neighbours.

Without a mechanism to suppress, redact, or remove this legacy information, the proposed protections would be largely ineffective for existing officers and would, in practice, benefit only those appointed prospectively.

We acknowledge that a wholesale review and redaction of historic filings would require significant resources, but submit that a targeted, application-based mechanism would strike a proportionate balance. In the UK, individuals, including company directors, may apply to Companies House to remove personal details, including residential addresses, from the public register. We request that limited statutory powers be conferred on the CRO to enable it, on application by a relevant officer, to suppress, redact, or remove residential addresses from the public record, modelled on the UK Companies House system.

## **Section B: Proposed changes to the Co-operative Societies Bill:**

### **Implications for information retained by a Co-operative Society:**

**Question B1:**

**Do you have any views on the intended approach relating to the maintenance by co-operative societies of address details of relevant officers?**

**Response:**

We support consistent adoption of the approach for co-operative societies. Harmonisation across legal forms promotes coherence, reduces compliance complexity, and enhances practical effectiveness.

### **Implications of the proposed changes for information maintained by the Registrar of Co-operative Societies:**

**Question B2:**

**Do you have any views on the intended approach relating to the filing with, and maintenance by, the Registrar of Co-operative Societies of address details of relevant officers of co-operative societies?**

**Response:**

We agree with the Department's intended approach.

**Restricted access to the “usual residential address”:**

**Question B3:**

**Do you have any views on the proposed list of entities that may be granted access to the “usual residential address” of relevant officers of co-operative societies?**

**Response:**

Please the response to Question A3 above.

**Question B4:**

**Are there any other comments you wish to make on the proposed approach to dealing with the “usual residential address” of relevant officers of co-operative societies?**

**Response:**

Please see the response to Question A4 above regarding historic filings.

We recommend an application-based suppression/redaction mechanism for historic filings to mitigate ongoing risks posed by legacy disclosure.

## **Section C: Changes to the Registration of Limited Partnerships and Business Names Bill:**

### **Implications for information retained by the LP:**

**Question C1:**

In relation to the implications for Limited Partnerships, do you have any comments on the proposals?

**Response:**

We support consistent adoption of the approach for Limited Partnerships with partners' "usual residential addresses" kept off the public record in favour of a public "contact address". Harmonisation across legal forms promotes coherence, reduces compliance complexity, and enhances practical effectiveness.

### **Implications of the proposed changes for information on LPS maintained by the Registrar of Companies:**

**Question C2:**

**Do you have any views on the intended approach relating to the filing with, and maintenance by, the Registrar of Companies of address details of a partner in a Limited Partnership?**

**Response:**

We agree with the Department's intended approach.

**Implications of the proposed changes for information on Register of Business names maintained by the Registrar of Companies:**

**Question C3:**

**Do you have any views on the intended approach relating to the filing with, and maintenance by, the Registrar of Companies of address details of a person registering a business name?**

**Response:**

We agree with the Department's intended approach.

**Restricted access to the "usual residential address" for an LP and a registered business name:**

**Question C4:**

**Do you have any views on the proposed list of entities that may be granted access to the "usual residential address" of a partner of a Limited Partnership or a registered business name applicant?**

**Response:**

Please see the response to Question A3 above.

**Question C5:**

**Are there any other comments you wish to make on the proposed approach to dealing with the “usual residential address” of a partner of a Limited Partnership or a registered business name applicant?**

**Response:**

Please see the response to Question A4 above regarding historic filings.

We recommend an application-based suppression/redaction mechanism for historic filings to mitigate ongoing risks posed by legacy disclosure.

### **Freedom of Information Act 2014 and Publication of Submissions**

Your attention is drawn to the fact that information provided by you in submissions is subject to release by the Department under the Freedom of Information Act 2014. In responding to

this public consultation, all individuals and organisations should clearly indicate where their submission contains personal information, commercially sensitive information, or confidential information which they would not wish to be made publicly available by being published on the Department's website or released by the Department pursuant to the receipt of an FOI Request under the Freedom of Information Act 2014.

### **General Data Protection Regulation (GDPR) and Data Protection Acts 1988 to 2018**

The Department of Enterprise, Tourism and Employment is subject to the provisions of the GDPR and Data Protection Acts 1988 to 2018. In this context, the Department will treat all personal information which you provide in submissions as part of this public consultation process with the highest standards of security in line with our data protection compliance requirements. We would like to draw your attention to the Department's Data Protection Privacy Notice which is available on our website and explains how and when we collect personal data, why we do so and how we treat this information. It also explains your rights in relation to the collection of your personal information and how you can exercise your rights under data protection laws.

**November 2025**