



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

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:

The broad thrust of this proposal is welcome, but the intended protections are rendered ineffective if the home addresses of existing officers remain publicly available on previous CRO filings.

Recent legislative developments in the UK are worth noting. Since 18 November 2025, companies are no longer obliged to keep a register of directors' residential addresses. The Economic Crime and Corporate Transparency Act 2023 (**ECCTA**) repealed section 165 of the Companies Act 2006 which required companies to maintain such registers. Section 165 did not apply to private companies that instead opted to keep the relevant information in the register of directors' residential addresses on the central register. This alternative regime was also repealed by the ECCTA. The new measures require companies to make notifications to ensure that the record of directors' residential addresses maintained at Companies House is correct and up to date.

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:

The broad thrust of this proposal is welcome, but the intended protections are rendered ineffective if the home addresses of existing officers remain publicly available on previous CRO filings.

Again, the UK position is worth noting. Similar protections have been in place for almost twenty years and there is a system for redacting historical data upon request.

The Companies Act 2006 imposes restrictions on the use and disclosure of "protected information" by the company itself and the registrar of companies. The home addresses of directors and former directors are protected information for these purposes.

Under section 242 of the Companies Act 2006, the registrar of companies must omit protected information from the material on the register of companies that is available for public inspection where it is contained in a delivered document in which such information must be stated. The registrar is not obliged, however, to check other documents or other parts of the document to ensure the absence of protected information.

The above provisions were not retrospective in nature. However, section 1088 of the Companies Act 2006 created a mechanism to redact historical information on the register that comes within the protection regime (See: [Removing your home address from the Companies House register](#)).

DETE should examine the feasibility of establishing a similar regime in Ireland.

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:

Agree with proposal

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:

The security and identity theft risks associated with the public disclosure of home addresses, dates of birth and signatures of company directors have already been well-articulated by the Law Society of Ireland, the Company Law Review Group and Transparency Ireland.

The UK government recently noted that it was: "a key principle that individuals running companies should register their details so they can be held to account for the company's affairs. However, there are instances where disclosure of information on the public register can lead to an increased risk of fraud and identity theft, or put individuals at risk for other reasons, such as in cases of domestic abuse." [[Preventing abuse of personal information on the register](#)]

An Coimisiún Toghcháin recently recommended changes in relation to the [inclusion of candidate addresses on ballot papers](#), lending further weight to the arguments in favour of respecting the privacy of those engaged in public life.

There has been a distinct lack of urgency in addressing the real risks posed to company officers both in terms of the flawed 10-year-old T1 exemption process and now in the proposal to keep accessible the private information of existing company officers. Ireland's approach remains difficult to explain to directors of multinational companies and SMEs alike. It is an unnecessary price of doing business in Ireland and we urge the DETE to give further consideration to the proposals.

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:

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:

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:

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:

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:

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:

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:

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:

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:

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