



The European Business Registry Association (EBRA), together with our peer organizations International Association of Commercial Administrators (IACA), Corporate Registers Forum (CRF) and ASORLAC, sought member feedback on the impact of the COVID-19 Pandemic on business registries. The response period was open from 8 March to 16 April 2021. We hereby present the received responses from our member jurisdictions.

Country	United Kingdom
Jurisdiction	England and Wales, Scotland, Northern Ireland
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COVID-19 in your country

The COVID-19 pandemic has had a profound effect on the UK and the wider economy. The UK government, the Scottish Government and Welsh assembly have all imposed restrictions on businesses and individuals to reduce transmission which have contributed towards a sustained reduction in GDP. There have been several periods of lockdown since the first UK-wide lockdown on 23 March 2020 and each devolved administration has also created a regional set of rules which have varied over time and across the jurisdictions. This has resulted in considerable uncertainty for business and imposed limitations on a wide range of activities.

The restrictions have by necessity limited social interactions, leisure activities and travel, which has impacted heavily on certain sectors of the economy, while other sectors have fared better. Those sectors of the economy which have been able to adapt to the change in circumstances or have businesses models which have not been heavily impacted by the pandemic and subsequent restrictions have been the least impacted. There has also been a subset of businesses benefitting from the changes in customer behavior during the pandemic.

The pandemic response and need to safeguard employees have prompted a huge surge in homeworking in those businesses that can adapt to this requirement. The UK Government has also introduced support measures for businesses and employees including grants and furlough payments. These are intended to mitigate the economic impact and allow businesses to remain viable during the pandemic and also to partially offset the expected spike in unemployment.

The most recent lockdown measures are now starting to be eased in all three jurisdictions as COVID-19 infections and deaths decrease following the success of the vaccination program. This has resulted in all three administrations gradually easing the restrictions on business and travel.



Impact of COVID-19 on workload and operations

The combination of UK businesses adapting their working practices to safeguard staff, the need to comply with COVID-19 restrictions and the wider macro-economic impacts from the pandemic have significantly impacted the workload for the organisation. There have been sustained reductions in workload on a broad spectrum of transaction types including those which are impacted by wider macroeconomic factors such as the registration of mortgages and charges. Conversely certain transaction types such as the incorporation of a new company have risen as individuals seek to adapt to the changing climate for business and employment. To December 2020 of this financial year we have already incorporated 598,950 new companies, against an overall 665,495 in 2019-2020.

Companies House has also seen a substantial shift away from paper filings to those transactions which have been digitally enabled. Our digital take-up has increased on all digitally enabled filings resulting in a sharp reduction in paper documents being received in the 2020-2021 financial year against previous years. This is a trend that the organization has actively sought to encourage due to reduced burden on businesses and the associated reduction in manual intervention required within Companies House for digital transactions compared to the paper equivalents.

While this shift in customer behavior was welcome in the circumstances, Companies House also proactively explored measures for mitigation of the pandemic impacts. In order to ensure service continuity and further support UK business, Companies House instigated an emergency taskforce to address two key goals:

- Keeping our colleagues safe by mobilising the workforce to work from home*
- Supporting the UK economy by ensuring companies could continue to use our services and meet their statutory obligations*

To facilitate this, we adopted agile approaches and empowered colleagues to take decisions at the lowest possible levels whilst enabling fast and responsive escalation. In doing so we have developed new services for customers and new internal processes and improvements to systems.

In record time we:

- Adapted and launched an automated system for companies to apply for an extension to their filing deadline – over 130,000 companies used this service in the first few months:
<https://www.gov.uk/guidance/apply-for-more-time-to-file-your-companys-accounts>*
- Launched a service where customers could have their critical authentication code delivered to their home address rather than their office address which was inaccessible due to lockdown arrangements:
<https://beta.companieshouse.gov.uk/auth-code-requests/start>*
- Launched an upload service where customers can upload documents and filings that have been paper-based for decades. Further development to this service means that those documents are now transferred straight onto our internal processing systems – enabling faster processing and better customer service:
<https://beta.companieshouse.gov.uk/efs-submission/start>*
- Adapted, enhanced and broadened existing services in some areas – promoting them to more customers and a wider area – for example introducing a digital application process for customers who may be at risk of harm, a further service for customers who wish to remove personal information from the register, and prioritised further development*



on the pay a late filing penalty service and enhancements to the late filing penalty appeals service.

As well as these new services Companies House also significantly broadened the scope of documents which were enabled for front end scanning (paper documents received being scanned) meaning the vast majority of the residual paper filings can now be worked on from home. To supplement these measures, we have restricted access to our offices and suspended our same day and counter services to reduce footfall into our offices and further reduce the scope for transmission.

In terms of keeping colleagues safe - we established a tiered approach with some critical services requiring colleagues to be in the office and others that could be done remotely. We then established an approach of moving processes from being 'office' based to being feasible 'remotely'. We did this by involving colleagues throughout – understanding their requirements, concerns, and the challenges of the individual processes (of almost 700 identified). We encouraged and rewarded innovation and creative thinking to develop new ways of working – including with external partners such as the courts, other government departments and law enforcement agencies.

As a combined consequence of these measures Companies House was able to expand the scope for staff working from home considerably - at key points during the pandemic our regular onsite workforce was reduced to just over fifty individuals out of a workforce of over a thousand. This in turn allowed our staff to continue to support customers throughout the pandemic and maintain a high level of service continuity.

The reduction in onsite staff also allowed Companies House to introduce a range of new measures to safeguard staff onsite. The increased floorspace available allowed for enhanced social distancing and each staff member to be allocated their own workspace. In our main office, key departments such as our Document Management Services team were split over more than one working area to mitigate the risk of transmission. Large areas of the building were re-designed by our estates team to support social distancing and new policies and procedures were introduced to mitigate the risk of staff with possible COVID-19 symptoms or those who are vulnerable from coming into work. The onsite canteen and other facilities were also suspended to further reduce the movement of people into and within the building.

With so many staff transitioning to working remotely over such a brief period, Companies House faced new challenges in terms of collaboration and communication. The organisation provided all affected staff with laptops and associated equipment to facilitate homeworking and rolled out a range of digital communication tools to the entire workforce – primarily based on MS Teams. Despite the challenges this has presented, the proactive communication, management visibility and clear concern for staff welfare has meant that staff engagement has been excellent. This has been demonstrated by an increase in our department's scores in the Civil Service People Survey from 70% to 75%.

In terms of meeting customer needs, we worked closely with stakeholders across the economy to understand their emerging requirements and responded to their feedback. We sought customer input and analyzed queries received, input from our customer care and customer services teams and feedback on social media and elsewhere. We enhanced and adapted our processes and existing services – informed by user insight and rapidly



conducted research – and prioritized the development of new services, working tirelessly to meet customer needs.

We implemented hundreds of changes and developments within a short period of time, working in an agile way and developing innovative solutions to meet the challenges of the pandemic.

Our response to the pandemic has been commended as being ‘best in class’ across government and this is further reinforced by our ability to maintain a very strong customer satisfaction score of 86% in extremely challenging circumstances.

Impact of COVID-19 on development projects and strategy

In the period immediately following the UK governments initial COVID-19 measures Companies House identified two key goals to support delivery of our pandemic response:

- *Keeping our colleagues safe by mobilising the workforce to work from home*
- *Supporting the UK economy by ensuring companies could continue to use our services and meet their statutory obligations*

To free up our digital, design, development and technology functions, as well as our policy and operational colleagues and supporting teams, to address these challenges, the Companies House Executive and main board took the bold decision to suspend all project-based activity for six months. This was intended to allow for key stakeholders to be seconded into an emergency taskforce, and for appropriate resource to be available to rapidly develop and implement solutions to the range of challenges the pandemic response presented. This approach also allowed us to quickly enhance and build on recently and previously developed functionality by utilizing the development teams with the best fit of skills and knowledge for those services and functions.

Prior to the pandemic Companies House had already been engaged in a sustained period of transition towards a fully digital organization. A large-scale organizational design activity was also underway as part of a wider transformation program that had commenced the previous year. The transformation program also included several other key work streams that were focused on mobilizing the workforce and enhancing services for customers.

The new taskforces were able to leverage the detailed analysis and work that had already taken place on these work streams and to call on the skills of a range of specialists and experts with detailed knowledge of our services who had previously been engaged on these activities. Consequently, the taskforces effectively had a ‘head start’ on progressing mitigation measures for the pandemic, both in terms of an excellent pre-existing level of awareness in the requirements for facilitating homeworking and in digitizing activities to allow customers to continue to file. Our approach also allowed us to develop these proposals quickly by creating working groups of specialists and assigning our analysis resource to quickly explore and assess the viability of proposals. This meant that any non-viable proposals were eliminated quickly and that the bulk of the effort could be focused on value adding activities and viable solutions from early on.

This combination of early triage of ideas and leveraging of our previous analysis activities meant that by the end of March 2020 the main proposals for mitigation were



already identified and being worked on. The proposals for a PDF upload service, residential address service for authentication codes, expansion of front-end scanning and a raft of other proposals were all initiated within this early period. Our policy and legal colleagues were heavily involved in this activity and embraced a pragmatic approach to delivery of services by looking for innovative solutions to any policy or legal constraints. Our use of an agile development approach allowed us to deliver discrete elements of functionality which would deliver value as early as possible. As a result, we were able to offer new services early on and then iteratively expand them to include more functionality to facilitate additional filings and interactions over time.

The work that Companies House had previously carried out during this period on enhancements to services, smarter ways of working, digitization of filings and non-filing interactions also paid real dividends during the pandemic. The technological requirements and approach to facilitate homeworking were already defined and understood, which meant that the rollout needed to be quickly expanded rather than starting from nothing. While this was still a massive undertaking, it was the acceleration of an existing work stream rather than the initiation of an entirely new one. The fact that 83 of our highest volume filing transaction types had already been digitally enabled meant that we were able to proactively encourage filers to opt for these methods immediately rather than having to develop new services – this allowed us to push our digital take-up significantly higher over a short timeframe and allowed customers to continue to interact with us to meet the bulk of their filing requirements.

The work we had previously carried out on digitizing non-filing interactions such as requesting more time to file accounts, paying a late filing penalty and appealing a late filing penalty meant that we were able to quickly modify these services to expand their scope and roll out additional functionality using our iterative approach. As a consequence, when some of these interactions spiked after the lockdown measures were introduced, we were able to cope with additional volumes using automation.

COVID-19 and companies

Due to Companies House' understanding of customer requirements and the effects and importance of our filing transactions on the wider economy, our operational, analysis and corporate insight and policy teams were able to collaborate on creating a list of priority interactions and filing types that would potentially be impacted by the pandemic and consequently negatively affect filers. The teams also factored in which of these transactions would also be of interest to our stakeholders including central government. Additional reporting was introduced early on to flag changes in customer behavior on these transaction types that would act as indicators to the effects of the pandemic and mitigation measures on businesses and the wider economy.

This early insight work also allowed us to collaborate effectively with our colleagues in the department for Business, Energy & Industrial strategy policy teams to identify measures to support business by providing legislative easements to some of our filing requirements and allowing companies more scope for dealing with creditors. This resulted in the introduction of the Corporate Insolvency and Governance legislation which included a range of temporary extensions to filing deadlines for key transactions such as annual accounts, the annual confirmation statement and mortgages and charges. The legislative easements also included a new moratorium type, for companies in financial distress to be



given more time to negotiate with creditors and introduced measures to allow company's annual general meetings to be conducted digitally.

As well as the legislative easements, Companies House also engaged with other government departments and other stakeholders, such as the courts, to explore a range of non-legislative easements to support business. These included facilities to allow insolvency practitioners to interact digitally with Companies House, new authentication methods, the facility to accept unstamped court orders where the courts were unable to carry out business in person, alternative methods for indicating that stamp duty had been paid on the purchase of shares and measures to facilitate digital delivery of certain filings and transactions.

The “New Normal”

Following the COVID-19 pandemic Companies House will continue to adapt and develop additional measures to support corporate resilience and continuity while helping to support business and our wider stakeholders. Several of the measures that were introduced to mitigate the effects of the pandemic on our customers were activities that the organization had planned to carry out over our ongoing five-year transformation programme, or was in the process of developing. This meant that Companies House was well placed to adapt to the rapidly changing climate and enhance our products and services to meet the needs of the customer. While the pandemic has had a disruptive effect on some of our longer term planning the main effect has been to bring forward certain activities, and to change the relative priorities of others. Most of the activities and work that has been carried out has been closely aligned to the wider Companies House strategy and will remain in place post pandemic. Companies House recent adoption of a service model approach and our use of agile methodologies means that we are committed to iteratively improving and developing our existing services. Consequently, we will seek to continually progress our filing functionality through our ‘digitization spectrum’ from backend scanning to front end scanning, PDF upload or fully digital journeys as appropriate to meet the customer demand and in line with our cost/benefit approach to project governance.

As well as the push to digital inbound journeys for both filing and non-filing interactions Companies House is currently exploring the scope for increased provision of digital outputs to replace pre-existing paper and legacy data format output services such as the provision of certificates, certified copies, microfiche searches and hard file searches. We are also engaged in a longer-term activity to move more of our infrastructure onto cloud-based technologies which taken with the other digitization activities will allow us to further reduce our reliance on our physical estate to support our services.

Alongside the future transformation of our services Companies House continues to look towards how we will use our office space and technical capabilities to build on the acceleration of our Smarter Working programme, that the response to the Covid-19 pandemic has afforded us. Going forward we will utilise the responses from our preference exercise to establish how our office and home-working environment will support our ability to provide excellent customer service and maintain our register as we emerge from the pandemic into a more sustainable working model. Throughout, we will engage, educate and support colleagues to ensure a great working environment and community.



Please share anything else you find relevant in the context of coping with the COVID-19 pandemic that you haven't mentioned before. If you would like to submit any supporting information related to your response, please e-mail your file to survey@ebra.be, with clear reference to your country and jurisdiction.

Companies House Strategy 2020-2025 can be found using this link:
<https://www.gov.uk/government/publications/companies-house-strategy-2020-to-2025>.