

Submission on discussion document: *Publication of Directors' Residential Addresses on the Companies Register*

Your name and organisation

Name	Kathy Dent
Organisation	Kathryn Dent & Associates Ltd

Please select if your submission contains confidential information:

I would like my submission (or specified parts of my submission) to be kept confidential, and attach my reasons for this for consideration by MBIE.

Responses to discussion document questions

1	Do you have any comments of our assessment of the options for approaching directors' residential addresses on the Companies Register?
	With a DIN there is no need for any address to be publically available.
2	What is your preferred option?
	An address for service will in small companies be the same as a residential address and therefore creates another layer of compliance for the small companies. Just making publically available the directors city from their residential address would be sufficient for those using the register to research companies and directors.
3	Are there interested parties who may have a legitimate reason to need to access directors' residential addresses? If so, who?
4	Is there a public interest in directors' residential addresses being provided to third parties such as journalists?
	None
5	Under what circumstances should directors' residential addresses be released to an interested party?
	On proof of a legitimate purpose, we already receive enough spam.
6	Do you agree that government departments and agencies should have automatic access to

	directors' residential addresses?
	Yes
7	Should this access be limited to the enforcement of law or are there other situations where it may be appropriate for government departments and agencies to have access to directors' residential addresses?
	Yes
8	Are there other factors which you think should be included in considering approaches to directors' residential addresses in historic documents?
9	Do you agree with our preferred approach to historic documents on the companies register?
10	Have you encountered situations where you consider that members of the public have abused this provision? If so, please provide details.
	It is hard to tell where our spam comes from, but often it is addressed to "director".
11	Do you agree that shareholders' residential addresses should be treated the same way as directors' residential addresses (ie replaced with an address for service)?
	Replaced with a city address only.
12	Are there circumstances where third parties might have a legitimate interest in the residential address of a shareholder?
	Only for law enforcement.
13	Do you think any changes need to be made to the residential address requirements for officers of other types of entities?
	The recording of trust names as shareholders rather than just trustees names.

Other comments

Could the acquisition of a DIN be made along with the first company annual return after implementation date rather than as a separate process. The annual return could be pre-populated with directors who already have a DIN and the application process completed for all those who don't. This would spread the processing and provide an ongoing portal for acquiring a DIN essentially making it compulsory for any company filing an annual return to have up to date information and DINs for all its directors.