

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

## Your name and organisation

<b>Name</b>	Paul Hughes
<b>Organisation</b>	Personal

## 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

<b>1</b>	Do you have any comments of our assessment of the options for approaching directors' residential addresses on the Companies Register?
	They do not attach enough significance to the importance to maintain transparency, which is more important than privacy. The whole exercise is based on only 13 submissions in an earlier process. This does not warrant changing the principles of the status quo
<b>2</b>	What is your preferred option?
	I do not support any of your options as they as misguided and of less value than the status quo You need to maintain transparency for the register What we do need is court order protection for people subject to certain high importance situations such as Domestic Protection Orders There is merit in using a DIN for all directors, but only as a unique number for all directors to ensure that all directorships can be reliably linked, and this does not warrant replacing the need for company officials to lodge director addresses as at present
<b>3</b>	Are there interested parties who may have a legitimate reason to need to access directors' residential addresses? If so, who?
	Everyone – in the interests of transparency
<b>4</b>	Is there a public interest in directors' residential addresses being provided to third parties such as journalists?

	Everyone – in the interests of transparency
5	Under what circumstances should directors’ residential addresses be released to an interested party?
	All circumstances - unless there is a court order that withholds similar to a Domestic Protection Order
6	Do you agree that government departments and agencies should have automatic access to directors’ residential addresses?
	Everyone – in the interests of transparency
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?
	Everyone – in the interests of transparency
8	Are there other factors which you think should be included in considering approaches to directors’ residential addresses in historic documents?
	No “approach” is needed – the present practice keeps it all transparent
9	Do you agree with our preferred approach to historic documents on the companies register?
	No The status quo is working well.
10	Have you encountered situations where you consider that members of the public have abused this provision? If so, please provide details.
	I am not aware of any – all information can be abused – we should not let that get in the way of transparency, which ensures that different types of a more significant abuse do not occur
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)?
	Definitely not - the present practice keeps it all transparent – both directors and shareholders
12	Are there circumstances where third parties might have a legitimate interest in the residential address of a shareholder?
	Not applicable - the present practice keeps it all transparent
13	Do you think any changes need to be made to the residential address requirements for officers of other types of entities?
	Yes – we need transparency around all legal entities – including trusts, incorporated societies, charities etc.

## Other comments

I consider that this exercise is misguided. The whole exercise is based on only 13 submissions in an earlier process. This does not warrant changing the principles of the status quo. It inappropriately combines several matters together. The changes proposed would greatly diminish transparency as they apply to everyone and would lead to a wholesale loss of transparency, rather than the very few that may warrant special treatment. I do see some merit in a reliable means to ascertain all directorships/shareholdings of an individual, but that does not warrant changing the need for company officials to lodge all name and address information.