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# OPEN OWNERSHIP

The Global Beneficial Ownership Register

## Beneficial Ownership

From policy to practice: introducing the  
beneficial ownership data standard

Introduction session

[www.openownership.org](http://www.openownership.org)



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# Agenda overview - today

Coffee, breakfast and introductions	09:15 - 10:00
Welcome	10:00 - 10:45
Beneficial ownership: the key concepts	10:45 - 11:30
Coffee	11:30 - 11:45
Piecing together beneficial ownership	11:45 - 12:45
Lunch	12:45 - 13:45
Modelling beneficial ownership data using BODS	13:45 - 15:00
Collecting data on beneficial ownership: aligning policy and technology	15:15 - 16:30
Re-cap and close	16:30 - 17:00

# Welcome



# OpenOwnership

OpenOwnership drives greater corporate transparency across the world by making it easy to publish and access high-quality, linked data about who owns companies.

We provide two main technical tools:

- **the OpenOwnership Register.** Currently in beta, our aim is to Release version 1.0 of the Register by March 2019. Version 1.0 will establish systems allowing for validation and verification of submitted data and an effective user feedback loop. We will also develop an API to enable third party applications.
- **the Beneficial Ownership Data Standard.** The Standard is being developed in collaboration with dozens of international experts in company data and in technical standard-setting. It will enable the resulting beneficial ownership data to be interoperable, more easily reused, and higher quality.

Founded by the world's leading transparency organizations in 2016, including Transparency International, Global Witness, the ONE Campaign, the B Team, Open Contracting Partnership, and OpenCorporates.

# Global momentum

- G20 establishes high-level beneficial ownership principles (2014)
- UK's fully open data Persons of Significant Control register comes online (2016), closely followed by Ukraine and Slovakia, and Denmark in 2017
- EITI requires standard-implementing countries to publish beneficial ownership data for extractives companies operating in their jurisdictions (2016)
- OECD establishes standard for sharing beneficial ownership data via the automatic exchange of information program (2016)
- 5th European Anti-Money Laundering Directive to require all EU countries to establish public registers of beneficial ownership (2017)
- UK Parliament votes to require overseas territories to comply with the same levels of transparency as the UK (2018)

# From policy to practice

Opening up beneficial ownership data means:

- the data is more usable, and has more uses
- improved data quality
- genuine benefits to both society and business

# Introductions

**Who?**

Briefly introduce yourself

**Where?**

Where you are from, what is your role?

**Why?**

Why are you interested in beneficial ownership data?

# Our vision: useful and usable data

OpenOwnership accelerates a norms change around corporate transparency by making it simple to publish and access high-quality data about who owns companies.

# OPEN OWNERSHIP

Two key tools:

- OpenOwnership Register
- Beneficial Ownership Data Standard

The screenshot shows the OpenOwnership Register beta website. At the top right, there are links for Home, Learn more, Get involved, Feedback, Sign in, and Sign up. Below that is a search bar with the placeholder "Search company or name of person". A "Transliterate" button is also present. The main content area displays a list of registered companies with small profile icons and brief descriptions of their ownership structure.

Owner	Shareholding Details
Jennie Ann Fleming	Ownership of shares - More than 25% but not more than 50% Ownership of voting rights - More than 25% but not more than 50%
Timothy Glyn Davies	Ownership of shares - More than 25% but not more than 50% Ownership of voting rights - More than 25% but not more than 50%
William Robert Badham	Ownership of shares - More than 25% but not more than 50% Ownership of voting rights - More than 25% but not more than 50%
PRACTICAL PARTICIPATION LIMITED	

The screenshot shows the Beneficial Ownership Data Standard (BODS) beta website. The top navigation bar includes links for Primer, Data Schema, User Guides, Example Data, Tool Box, and About. The main content area is titled "BETA" and contains sections for "Primer" and "Search...". The "Primer" section includes links for "What is beneficial ownership?", "Why beneficial ownership is a useful concept", "What is beneficial ownership data?", and "What is the Beneficial Ownership Data Standard?". Below this is a question about what the Data Standard covers.

...data must be shared in standardised way...

The Beneficial Ownership Data Standard (BODS) provides a structured data format, along with guidance for collecting, sharing and using data on beneficial ownership:

- The [data schema](#) describes how and what data should be shared. It can also inform the design of data collection and management systems;
- The [user guides](#) give support for publishers and users of the data.

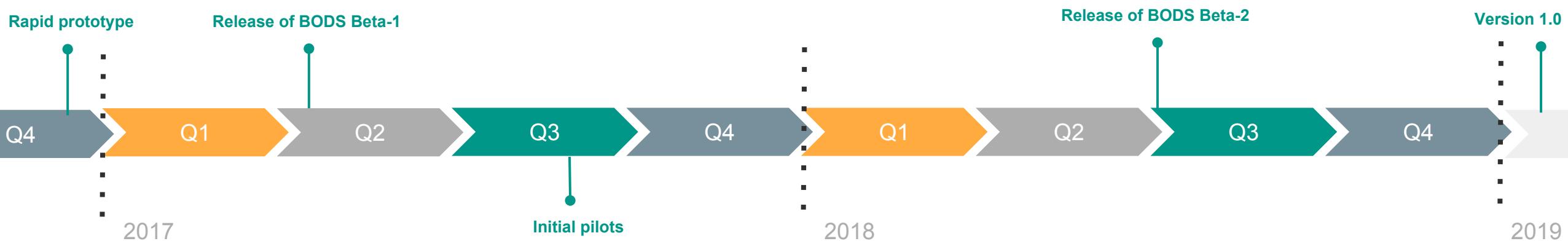
A diagram illustrating the data flow. It shows four separate stacks of documents, each with a red arrow pointing down to a central teal box labeled "standardised data". Below this is a circular diagram showing a network of entities: "Person A" is connected to "Company 1" and "Company 4", which are further connected to "Company 2" and "Company 3". Labels indicate "100% share owned by" and "50% director appointed by".

# The Beneficial Ownership Data Standard

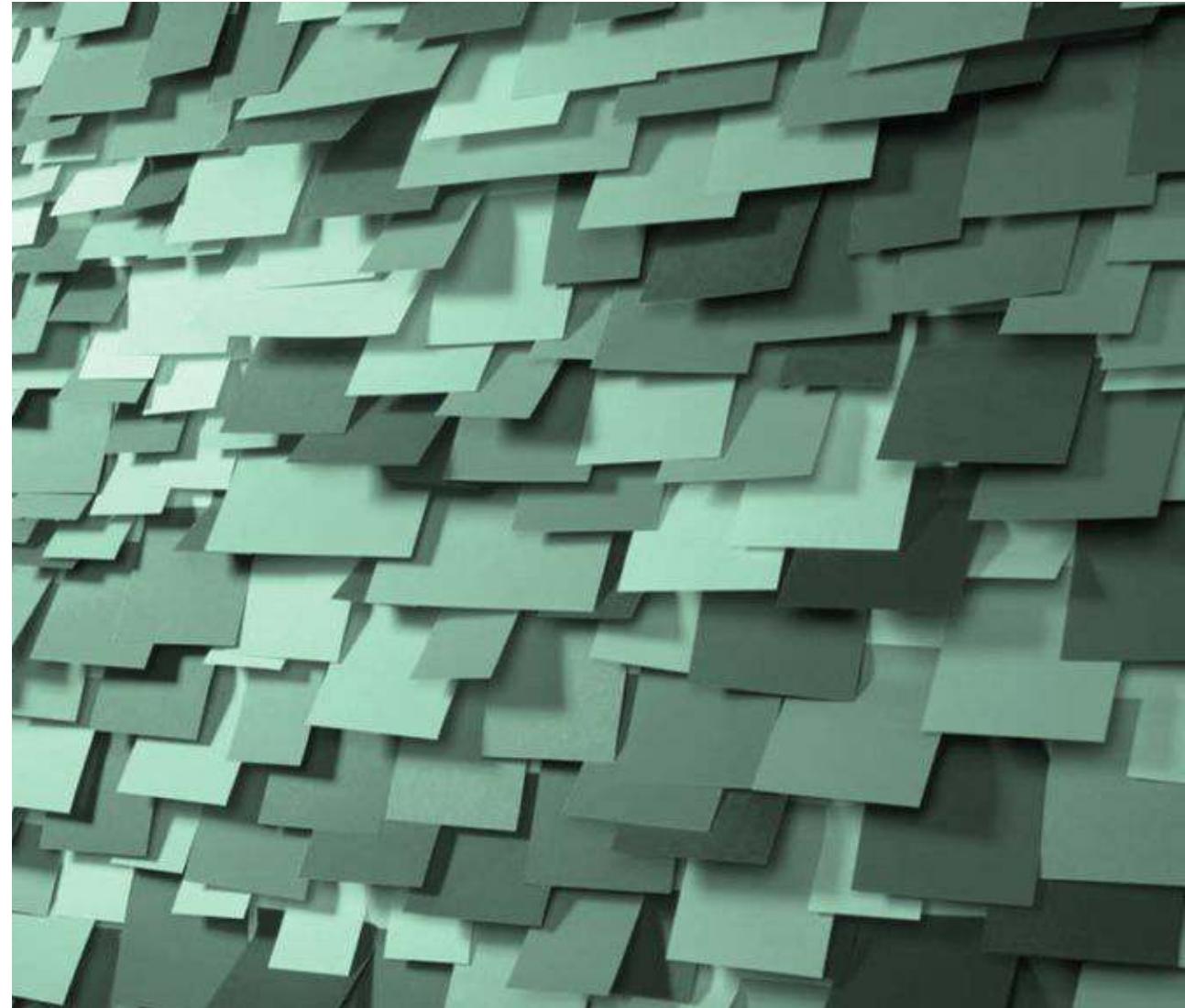
An **open data standard** for publishing information about **beneficial owners**.

Developed as a **public good** to make sure beneficial ownership disclosures are **usable, useful and in use**.

Under active development through an open standards process.



Based on data  
publisher and  
data user needs



# Based on publisher and data user needs

- Public Registers of Beneficial Ownership
- Self-submitted data
- Third-party submitted data
- Self-published data



# Based on publisher data user needs

- Public Registers of Beneficial Ownership
- Self-submitted data
- Third-party submitted data
- Self-published data

## Public Registers

As the government agency responsible for beneficial ownership disclosure we need a template for collecting and publishing data so that the database we build is useful and usable.

# Based on data publisher and data user needs

- Procurement & onboarding: screening and audit
- General investigations
- Data-led investigations
- Data validation



# Based on data publisher and data user needs

- Procurement & onboarding: screening and audit
- **General investigations**
- Data-led investigations
- Data validation

## General investigations

As an officer responsible for Know Your Customer (KYC) monitoring I **need** to search for beneficial disclosures of a particular company **so that** I can make sure we are aware of any Politically Exposed Persons (PEPs) involved in the company

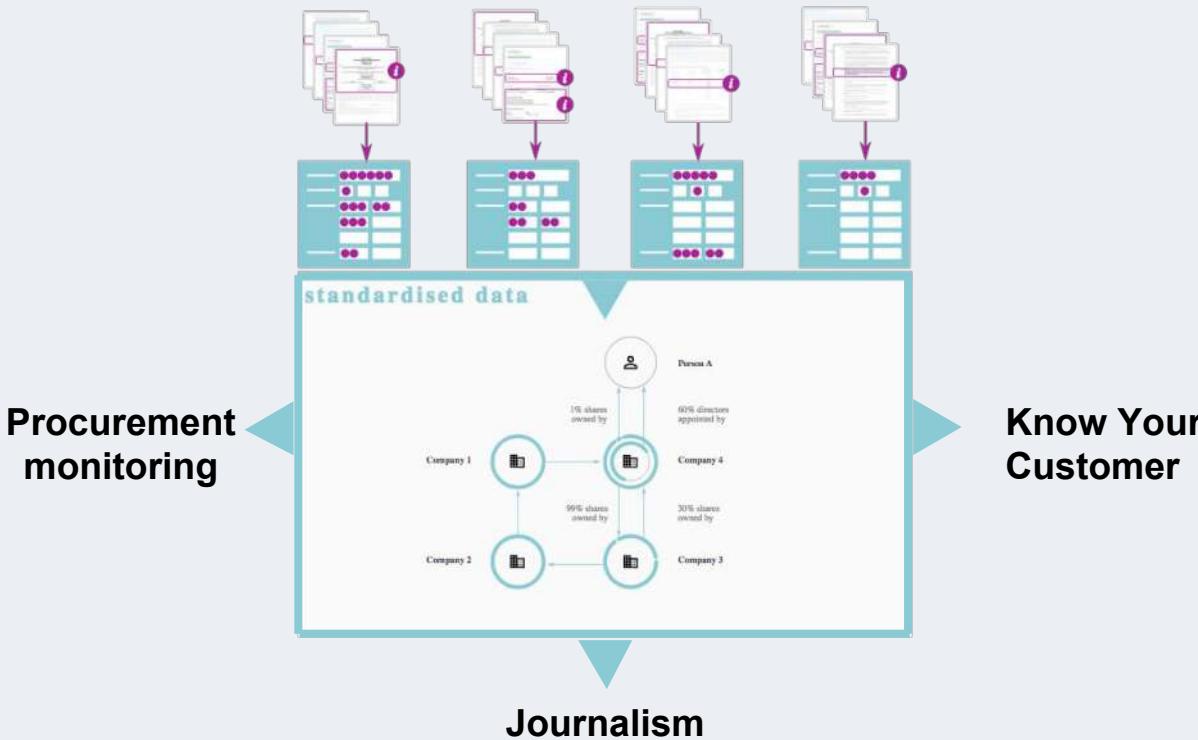
# Based on data publisher and data user needs

- Procurement & onboarding: screening and audit
- General investigations
- **Data-led investigations**
- Data validation

## Data led investigations

As a data journalist I **want to** explore the potential networks of ownership around a particular person **so that** I can research an article about corruption.

Publish once, use anywhere



Joining up between systems.

To meet these needs, we need data

- Structured data
- Standardised data
- Shared and open data

# An open standard

- Free, non-proprietary and open governance process
- Built on open technology and common standards
- Common approach with other open data standards

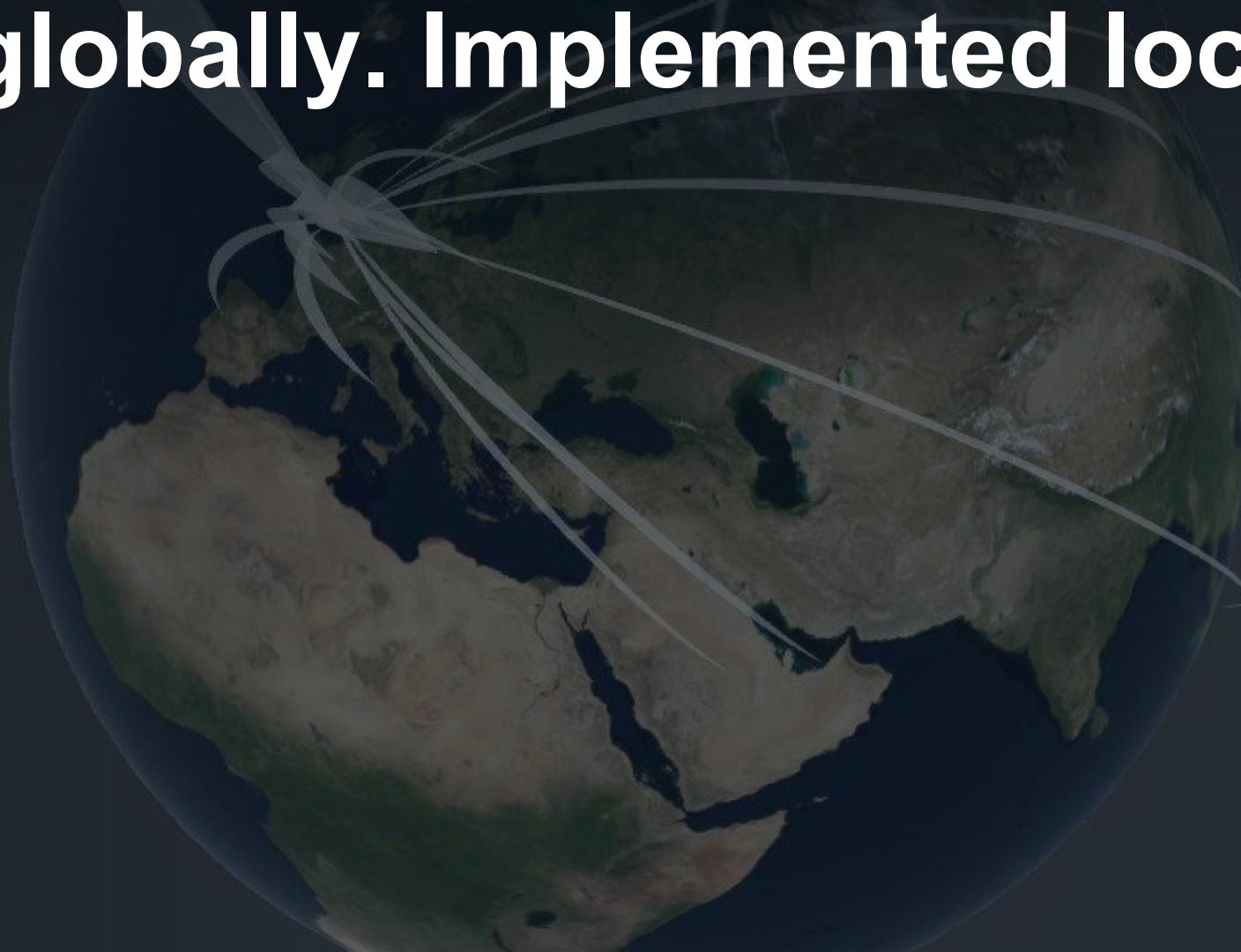
## Ownership or control Statement

An ownership or control statement is made up of an entity, an interested party (a reference to an entity, natural person, arrangement or trust), details of the interest and provenance information for the statement.

```
{  
  "id": "ownership-or-control-statement.json",  
  "$schema": "http://json-schema.org/draft-04/schema#",  
  "version": "0.2-beta",  
  "title": "Ownership or control Statement",  
  "description": "An ownership or control statement is made up of an entity, an int  
  "type": "object",  
  "properties": {  
    "statementID": {  
      "$ref": "../components.json#/definitions/ID"  
    },  
    "statementType": {  
      "title": "Statement type",  
      "description": "This should always be set to `ownershipOrControlStatement`.",  
      "type": "string",  
      "enum": [  
        "ownershipOrControlStatement"  
      ]  
    },  
    "statementDate": {  
      "$ref": "../components.json#/definitions/StatementDate"  
    },  
    "subject": {  
      "title": "Subject",  
      "description": "The subject of an ownership or control relationship.",  
    }  
  }  
}
```



# Shared globally. Implemented locally.



# Our goals for today

- Build up an understanding of beneficial ownership **piece by piece**
- Experience the **advantages of structuring data**
- Start thinking about the **policy and technical challenges** of collecting quality data

# Agenda overview - today

Ideas Parking  
Lot

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# OPEN OWNERSHIP

The Global Beneficial Ownership Register

## Beneficial ownership

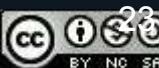
The Key Concepts

Presented by Kadie Armstrong

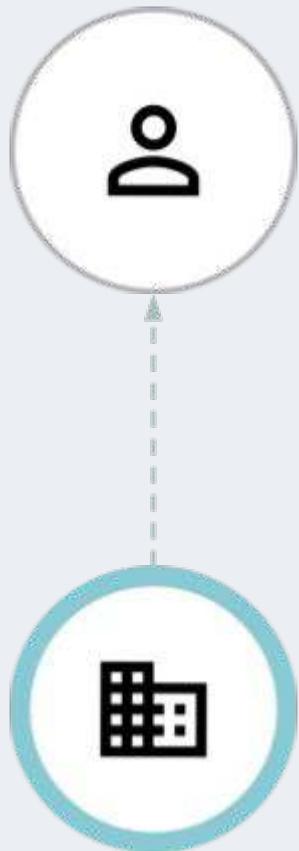
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# Session objectives



## Key concepts

Legal ownership      Companies  
  
Provenance    Entities    (In)direct ownership  
  
Arrangements      Trusts  
  
People as interested parties  
  
Ownership interest      Verification  
  
Interests      Thresholds  
  
Controlling interest      Change  
  
Beneficial ownership

Companies or people can **own**  
other companies...

## Key concepts

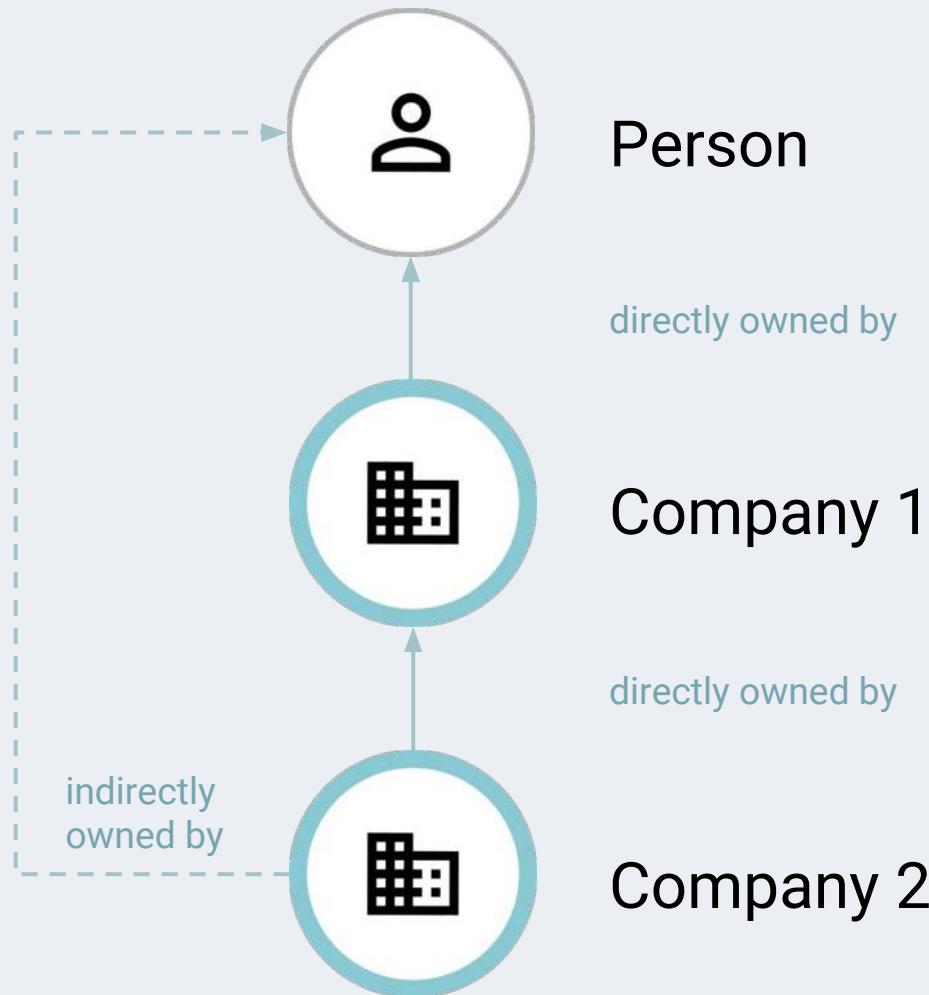
Legal ownership

Companies

Trusts



...but it's **people** that ultimately benefit...



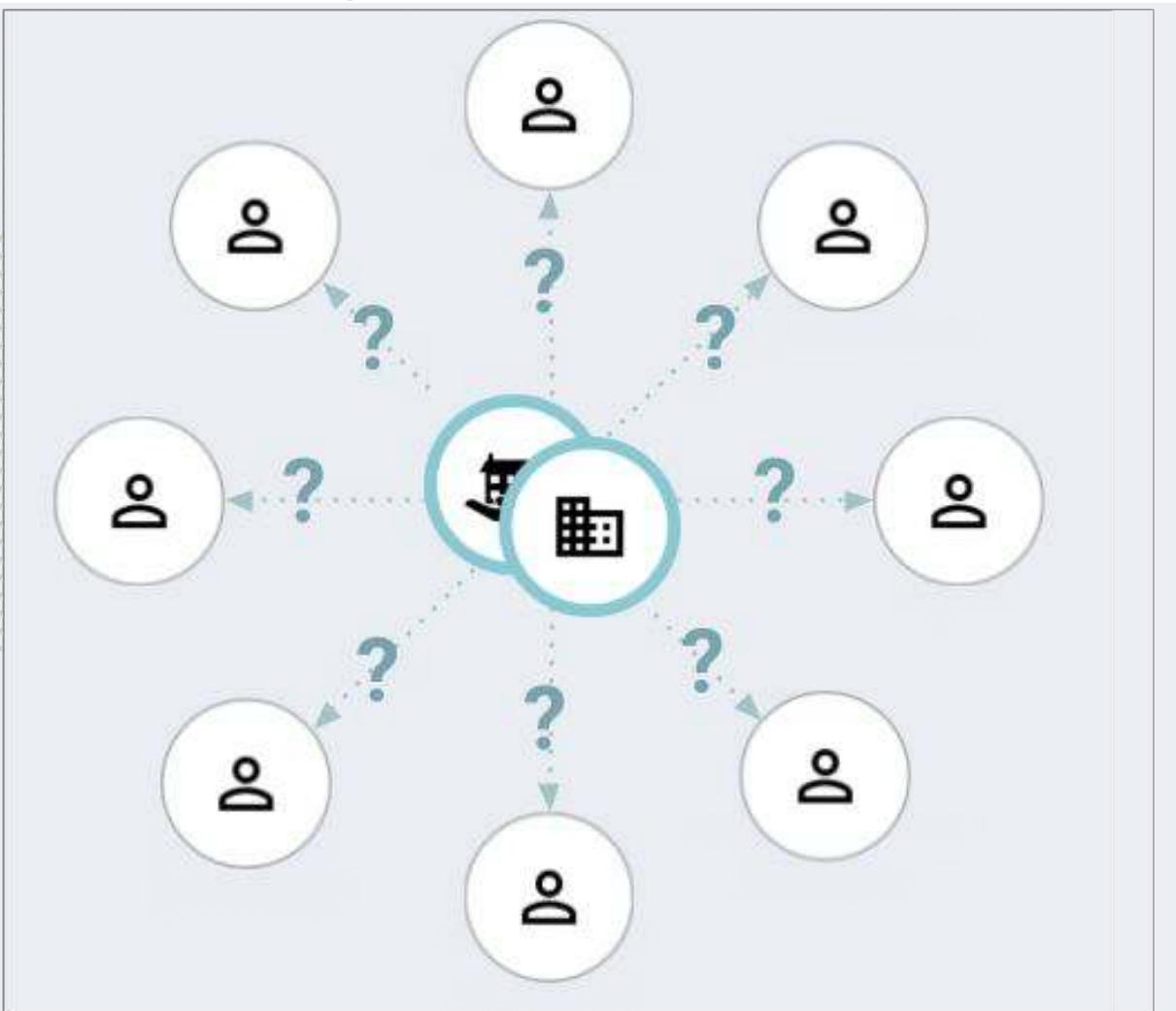
## Key concepts

Legal ownership      Companies

**Entities**    (In)direct ownership

Arrangements      Trusts

# What **interests** can people have in a company or trust?



## Key concepts

- Legal ownership      Companies
- Entities    (In)direct ownership
- Arrangements      Trusts
- People as interested parties**
- Ownership interest**
- Interests**
- Controlling interest**

# Why **control** matters

## Direct resources

Influence hiring decisions

Influence corporate structure

Channel investment

Control contracting

Influence acquisitions and mergers

Shape corporate tax planning

## Key concepts

Legal ownership      Companies

Entities    (In)direct ownership

Arrangements      Trusts

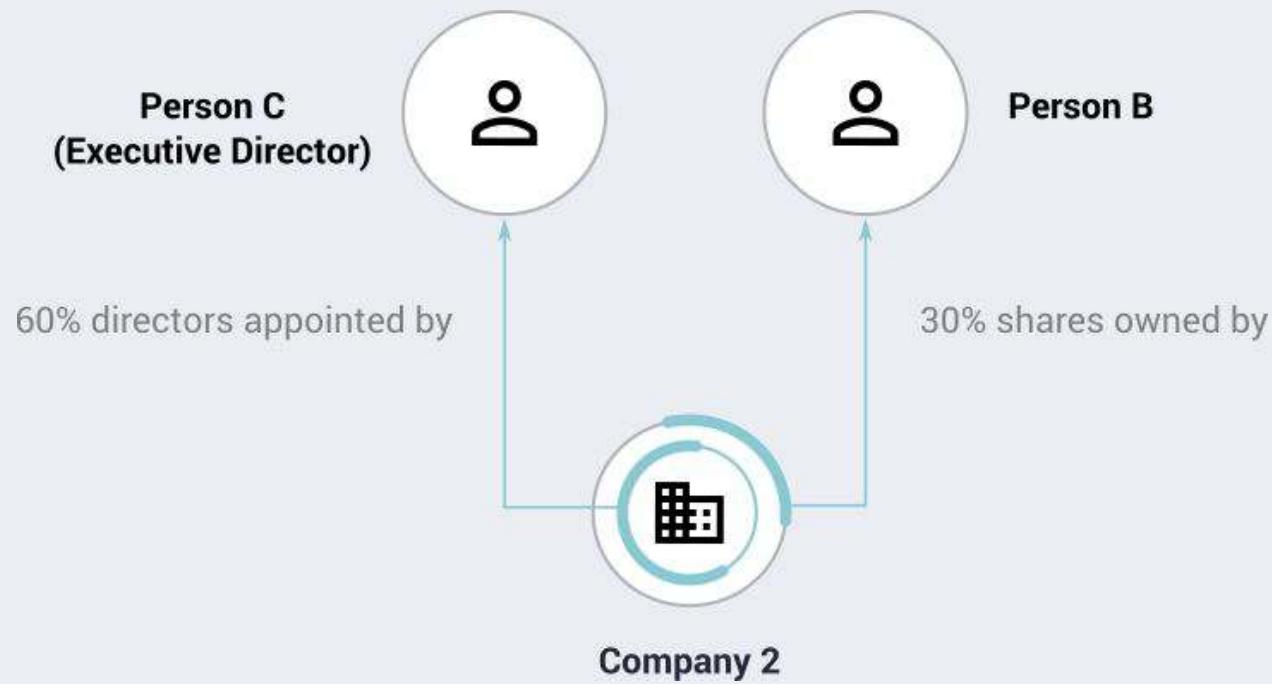
People as interested parties

Ownership interest

Interests

Controlling interest

# Definition

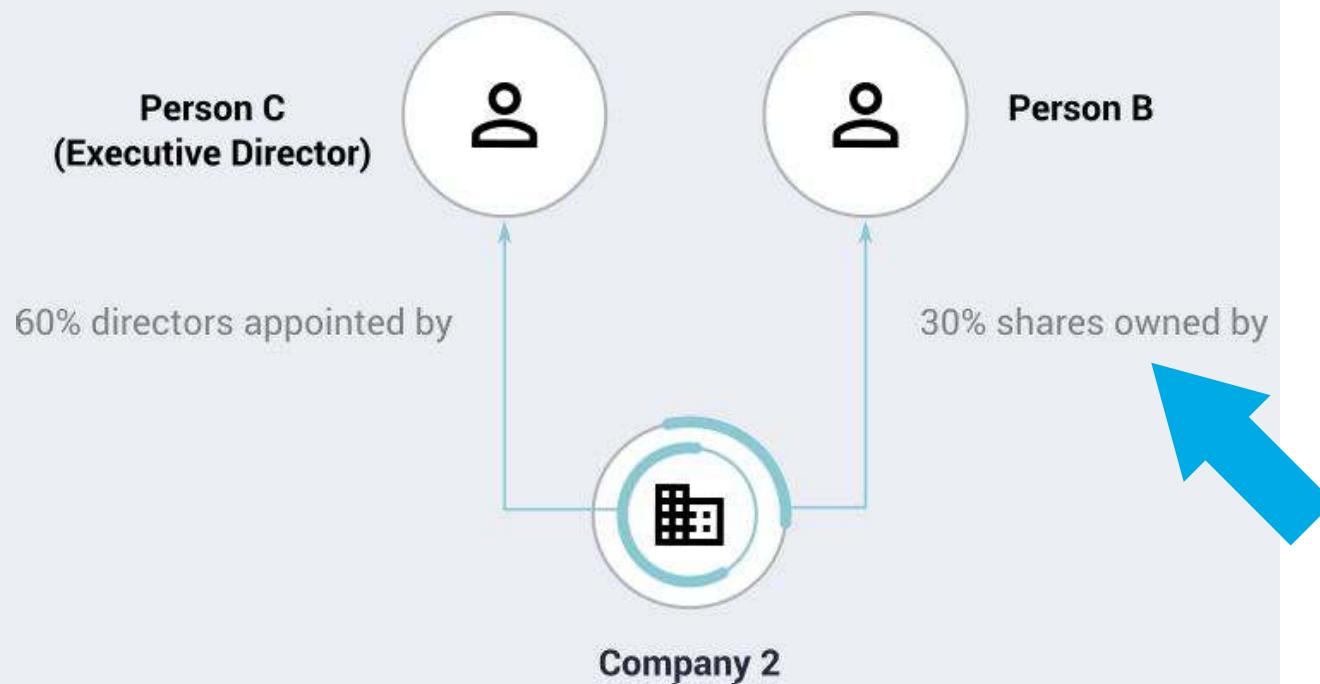


**Beneficial ownership** is the right of a person, directly or indirectly:

- to some share of a legal entity's income or assets (legal ownership), or
- to direct or influence the entity's activities (control).

[Note: this is sometimes referred to as *ultimate beneficial ownership*]

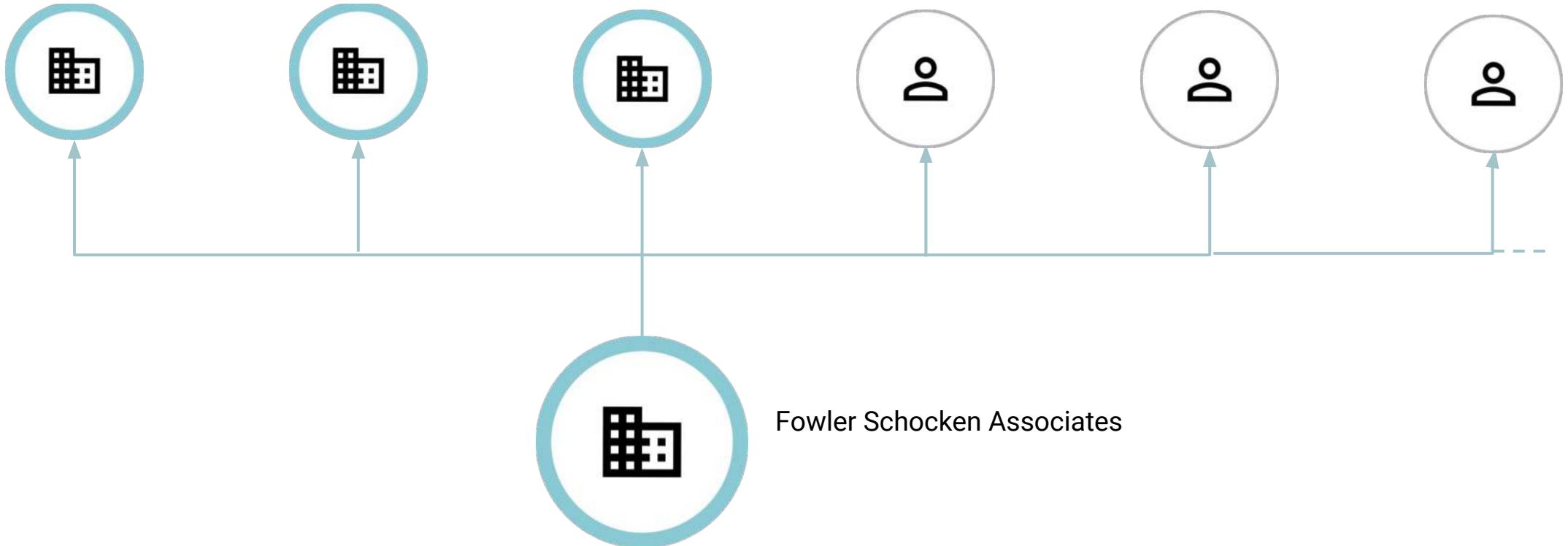
# Thresholds



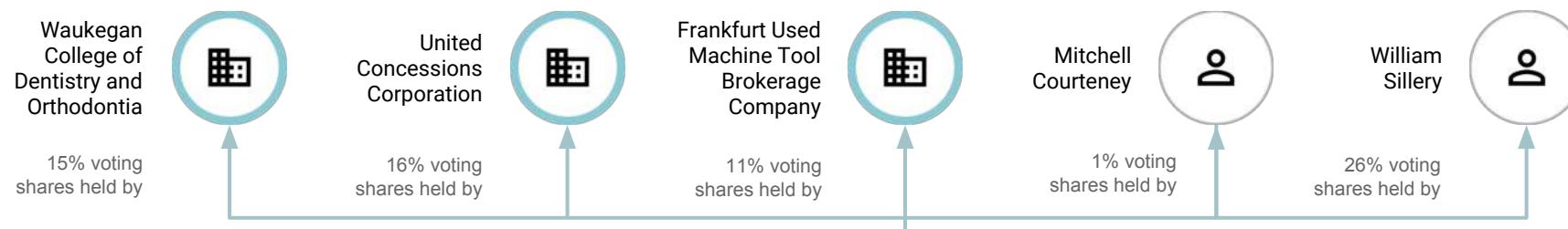
## Examples:

- UK a >25% ownership or controlling interest
- FATCA (USA) 10% for foreign investment vehicles
- Argentina 20%

# Legal owner vs. Beneficial owner (1)



# Legal owner vs. Beneficial owner (2)



# Key concepts

Legal ownership      Companies

Entities    (In)direct ownership

Arrangements      Trusts

People as interested parties

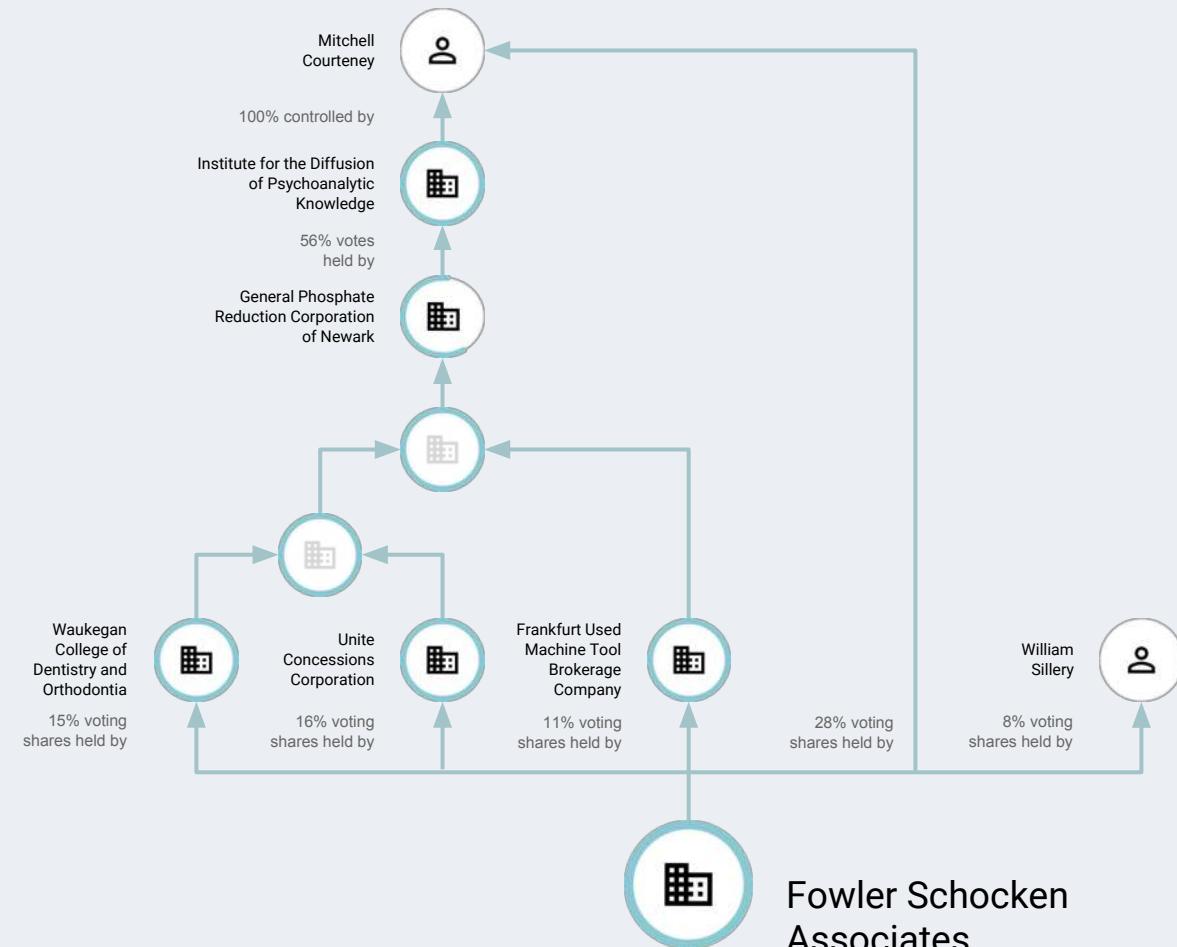
Ownership interest

Interests      **Thresholds**

Controlling interest

**Beneficial ownership**

# Three final features...

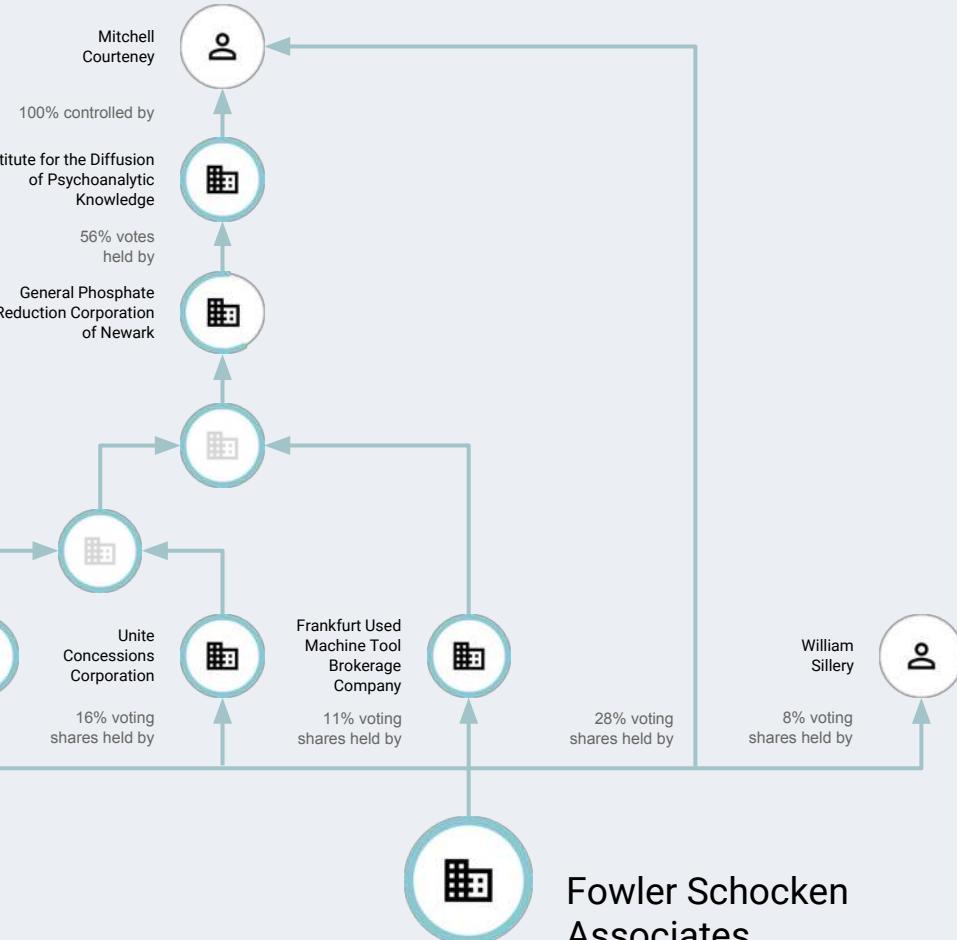


- Beneficial ownership **changes** over time.
- Where does the information come from anyway? (**provenance**)
- Even if the information comes from a real (and trusted source) how confident are we in its accuracy? (**verification**)

A simplified representation of a corporate ownership/control structure detailed in *The Space Merchants* by Frederik Pohl and Cyril M. Kornbluth (1952)

# Three final features...

## Key concepts



Legal ownership      Companies

Provenance      Entities      (In)direct ownership

Arrangements      Trusts

People as interested parties

Ownership interest      Verification

Interests      Thresholds

Controlling interest      Change

Beneficial ownership

A simplified representation of a corporate ownership/control structure detailed in *The Space Merchants* by Frederik Pohl and Cyril M. Kornbluth (1952)

... and a reminder



## Key (real world) concepts

Legal ownership      Companies  
  
Provenance    Entities    (In)direct ownership  
  
Arrangements      Trusts  
  
People as interested parties  
  
Ownership interest      Verification  
  
Interests      Thresholds  
  
Controlling interest      Change  
  
Beneficial ownership

# OPEN OWNERSHIP

The Global Beneficial Ownership Register



# Piecing together beneficial ownership information

Presented by Jack Lord



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# Based on data publisher and data user needs

- Procurement & onboarding: screening and audit
- General investigations
- **Data-led investigations**
- Data validation

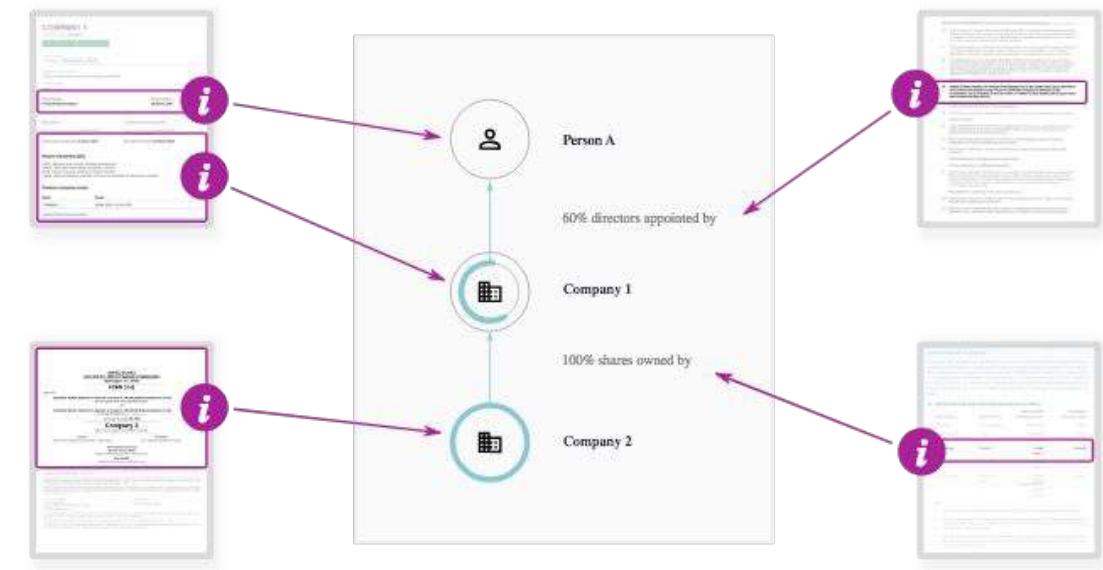
## Data led investigations

As a data journalist I **want to** explore the potential networks of ownership around a particular person **so that** I can research an article about corruption.

# Where is the data?

...data describing ownership and control is often scattered across documents...

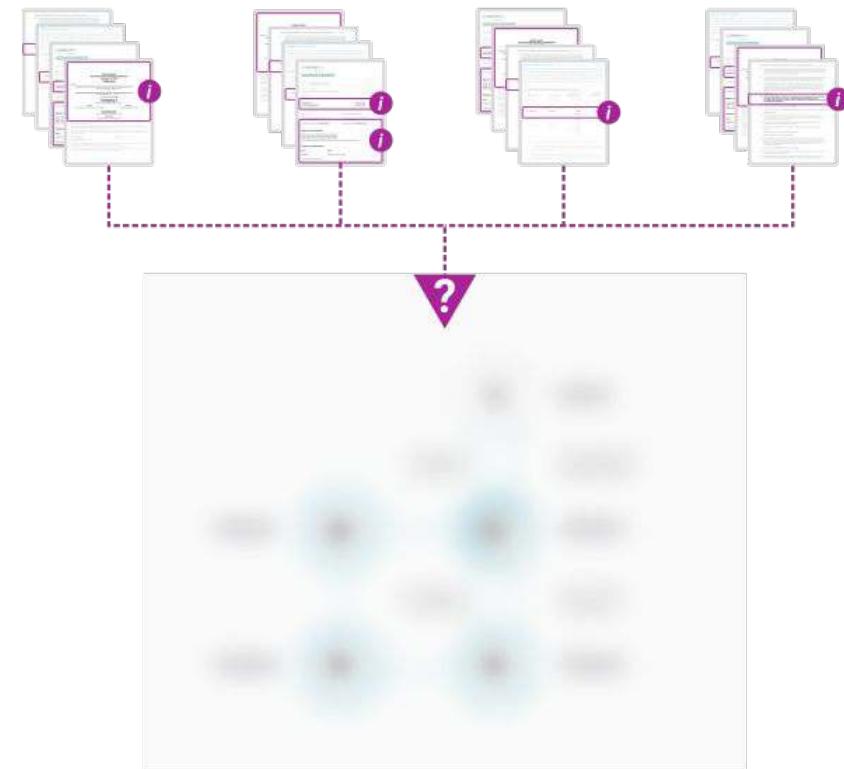
The data is often included in companies' annual reports, founding articles and filings to regulatory authorities. Bringing it all together can build the big picture about a company's beneficial owners.



# Bringing the data together

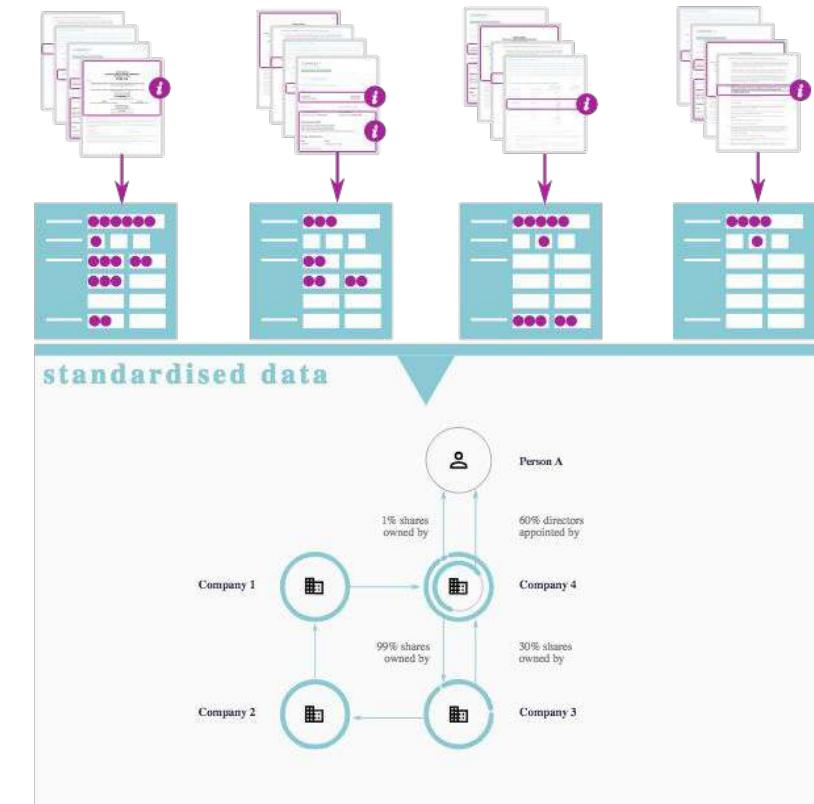
...from a variety of sources helps us understand complicated ownership and control structures.

But, without common standards, combining and analysing data from different sources can be extremely difficult, expensive and time-consuming...



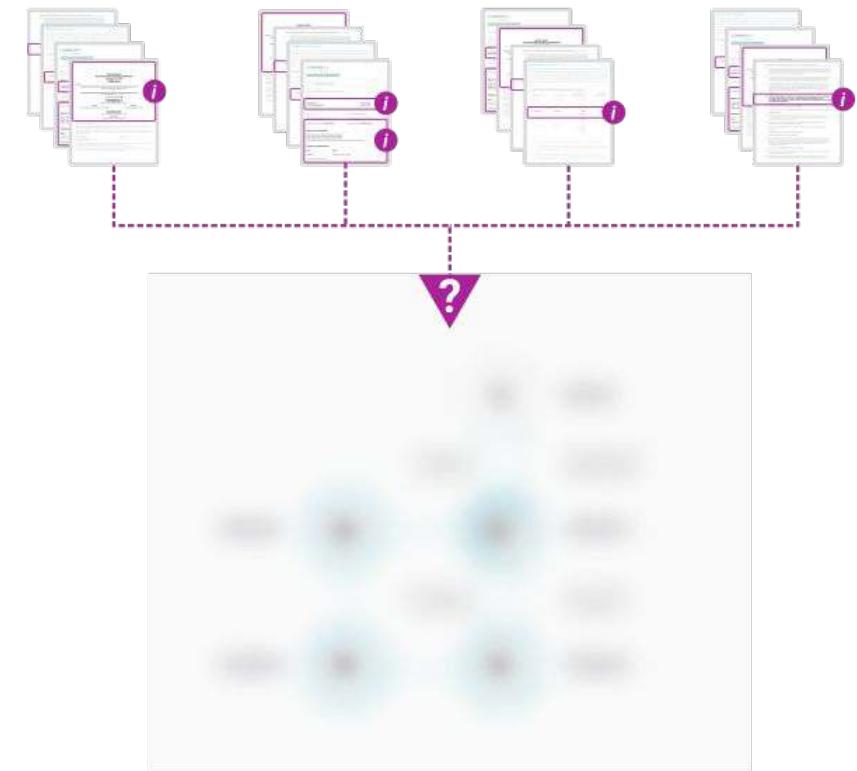
# A data standard is better

...Using a standard for beneficial ownership data reduces the cost of extracting, analysing and linking beneficial ownership data....



# A data standard is better

...but we need implementers to coalesce around a standard to make this possible.



# Piecing together beneficial ownership data



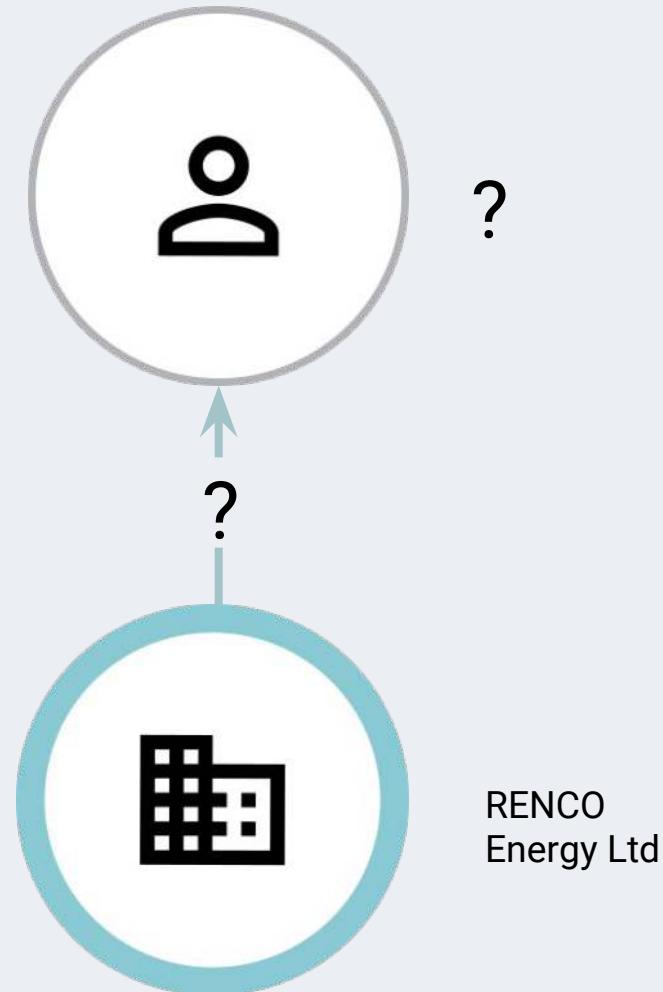
# Based on data publisher and data user needs

- Procurement & onboarding: screening and audit
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## Data led investigations

As a data journalist I **want to** explore the potential networks of ownership around a particular person **so that** I can research an article about corruption.

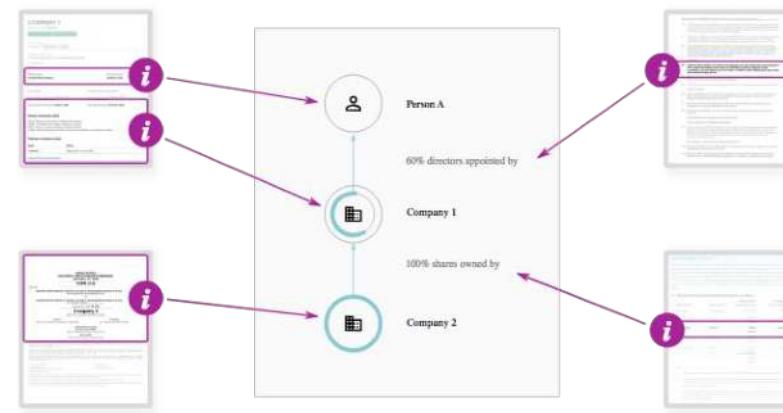
# Who are the beneficial owners of RENCO Energy Ltd?



A mining license was awarded to a large oil company in 2011. Records have emerged of undeclared payments being made to a local company, **RENCO Energy Ltd**, believed to have connections to political figures, including the Junior Minister for Mines and Oil, **Roberto López**. The Minister for Mines and Oil, **Ernesto Gómez Garrido**, has promised to investigate.

# Piecing together beneficial ownership

The goal of this task is to find the **beneficial owner(s)** of **RENCO Energy Ltd**, based in the fictional country of Diamondia by pulling together information in different documents.



# Piecing together beneficial ownership

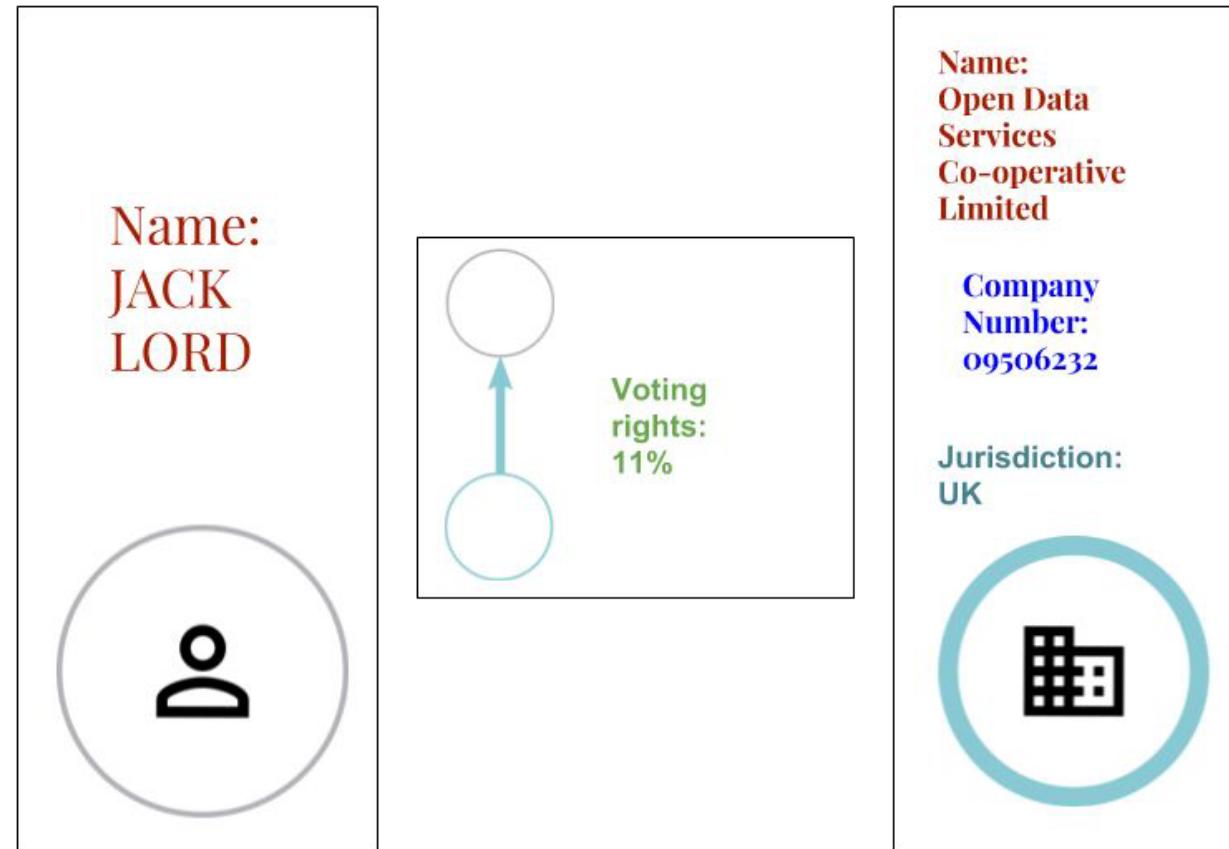
Each group has a **document pack**.

The **document pack** contains information on companies, people and legal and beneficial ownership.

Fill out three kinds of **template**: person, entity or relationship.

Place templates onto a large piece of paper to create a map that leads to the beneficial owner(s)

# Piecing together beneficial ownership



# Getting started

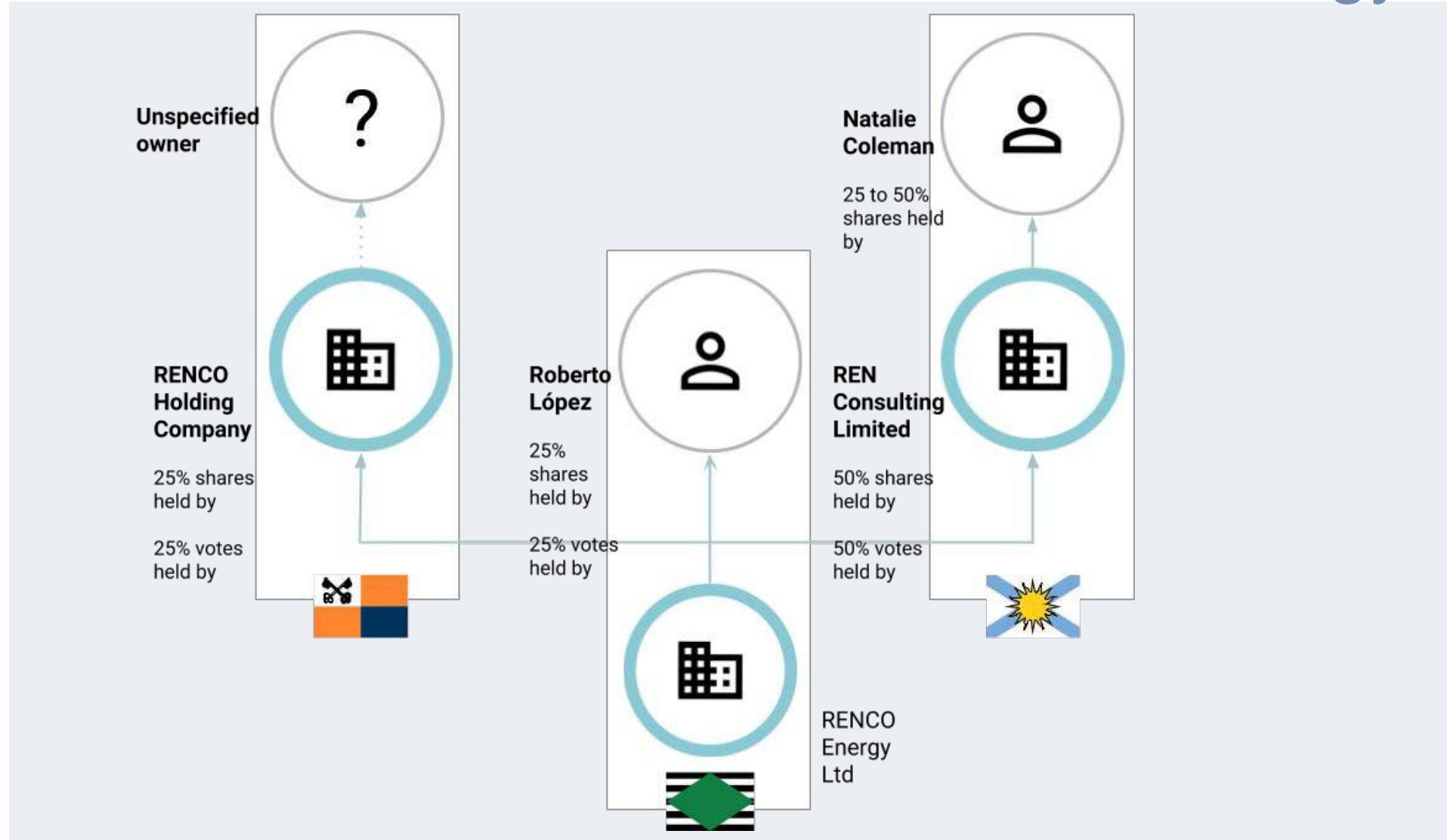
1. Use the *register of politicians' interests* to find any **beneficial owners** of RENCO Energy Ltd. Fill out templates for these people.
2. Use the *Diamondia company register* to find the shareholders (the **legal owners**) of RENCO Energy Ltd. Create new templates, or add detail to existing templates, for these entities or people.
3. Use the other documents to try and find the **beneficial owners** of the entities that own RENCO Energy Ltd.

# Who are the beneficial owners of RENCO Energy Ltd?

# Discussion

- What information was hard/impossible to find?
- What ambiguities were there in the data?
- What new information would be required to deal with other use cases?

# Who are the beneficial owners of RENCO Energy Ltd?



# OPEN OWNERSHIP

The Global Beneficial Ownership Register

## Good work:

You pieced together some  
beneficial ownership  
information!

[www.openownership.org](http://www.openownership.org)



# OPEN OWNERSHIP

The Global Beneficial Ownership Register



## Modelling beneficial ownership data using BODS\*

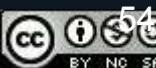
Presented by Tim Davies



\* **Beneficial Ownership Data Standard**

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# The BODS data schema

The data schema describes how data about the beneficial owners of a legal entity can be expressed and organised.

The schema is defined in a structured data format called JSON.

The image shows a side-by-side comparison between a physical annual return document from Companies House and its digital representation as JSON data.

**Companies House Document (Left):**

- Header:** AR01 (ef) Annual Return
- Details:** Received for filing in Electronic Format on the: 05/06/2016 X5856037V
- Company Information:** Company Name: MONSOON LIMITED, Company Number: 02585514

**JSON Data Schema (Right):**

```
...  
  "statementID": "938gj2vv-68gh-k67w-pp03-94uffjwgd45a",  
  "statementType": "entityStatement",  
  "groupID": "ab3fe482-ab3b-44e3-gfd5-45pl5930h394",  
  "statementDate": "2016-06-06",  
  "entityType": "registeredEntity",  
  "name": "Drillgreat Limited",  
  "foundingDate": "2007-06-26",  
  "identifiers": {  
    "scheme": "GB COH",  
    "id": "66292597",  
    "validationType": "strict"  
  },  
  ...  
  "statementID": "jky057dh-235d-00ut-106h-0pr55tghj341",  
  "statementType": "beneficialOwnershipStatement",  
  "groupID": "ab3fe482-ab3b-44e3-gfd5-45pl5930h394",  
  "statementDate": "2016-06-06",  
  "subject": {  
    "entity": {  
      "type": "entityStatement",  
      "describedByStatement": "5748fgey-3fg7-j78k-8j8d-14l09hn36fs6"  
    }  
  },  
  "interestedParty": {  
    "entity": {  
      "type": "entityStatement",  
      "describedByStatement": "938gj2vv-68gh-k67w-pp03-94uffjwgd45a"  
    }  
  },  
  "interests": [  
    {  
      "type": "shareholding",  
      "interestLevel": "direct",  
      "share": {  
        "exact": 98.7  
      }  
    },  
    {  
      "type": "voting-rights",  
      "interestLevel": "direct",  
      "share": {  
        "exact": 99.99  
      }  
    }  
  ]  
}  
JSON
```

# What happens without structured data and standards?

Compare

Nationality

Type in your nationality

```
{  
  "nationality": "UK"  
}
```

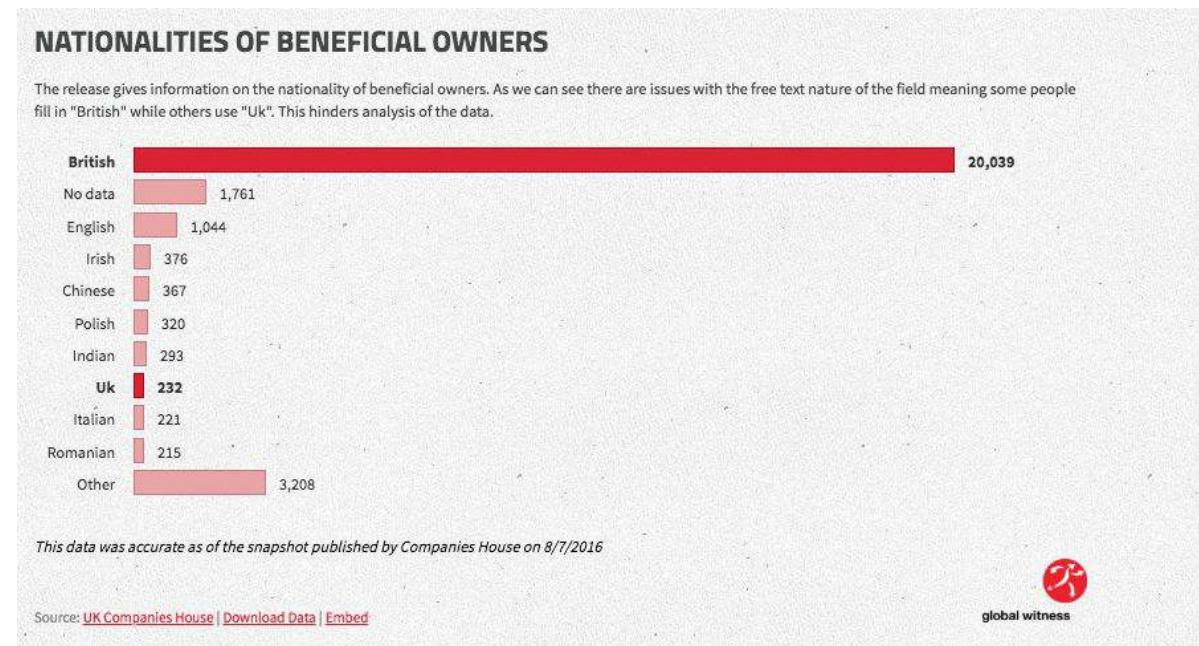
```
{  
  "nationality": "French"  
}
```

Nationality

 Select from the list

```
{  
  "nationality": {  
    "name": "United Kingdom",  
    "code": "GB"  
  }  
}
```

```
{  
  "nationality": {  
    "name": "la France",  
    "code": "FR"  
  }  
}
```



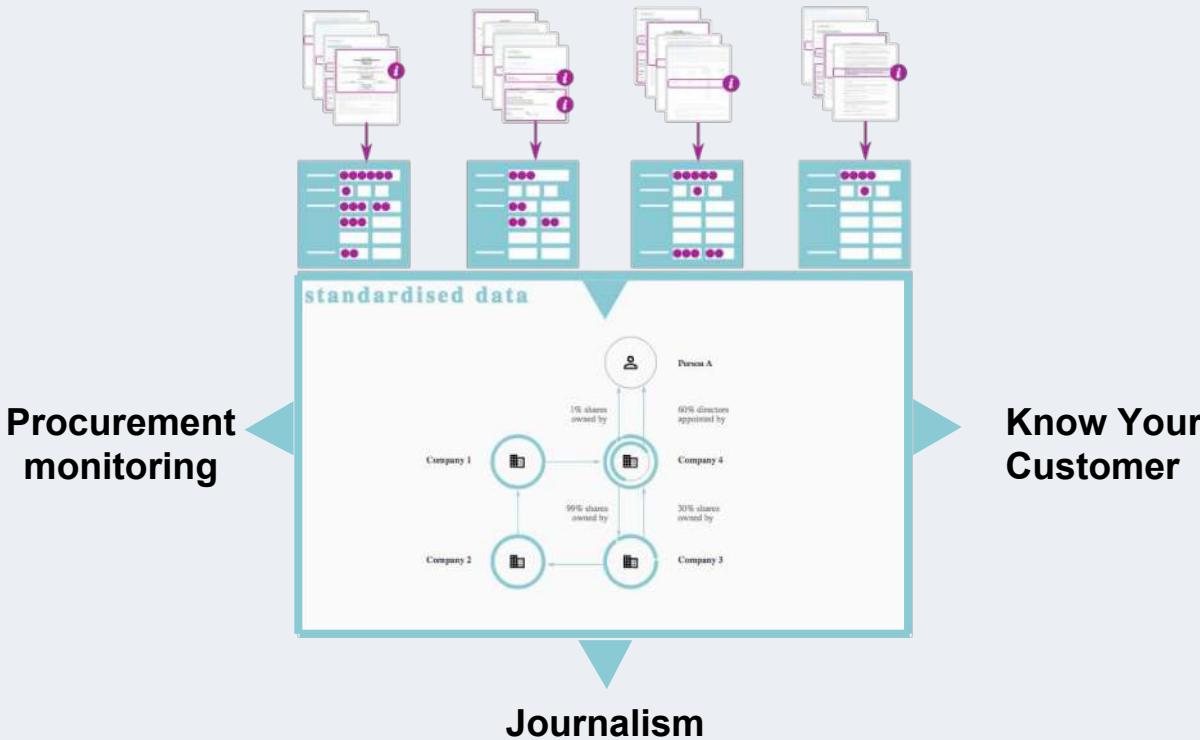
Early analysis from the UK Persons of Significant Control data found over 3,000 'nationalities' described.

This makes the nationality field less reliable for matching people's identities.

See: <https://www.globalwitness.org/en/blog/first-look-uk-beneficial-ownership-data/>

# Why use BODS?

Publish once, use anywhere



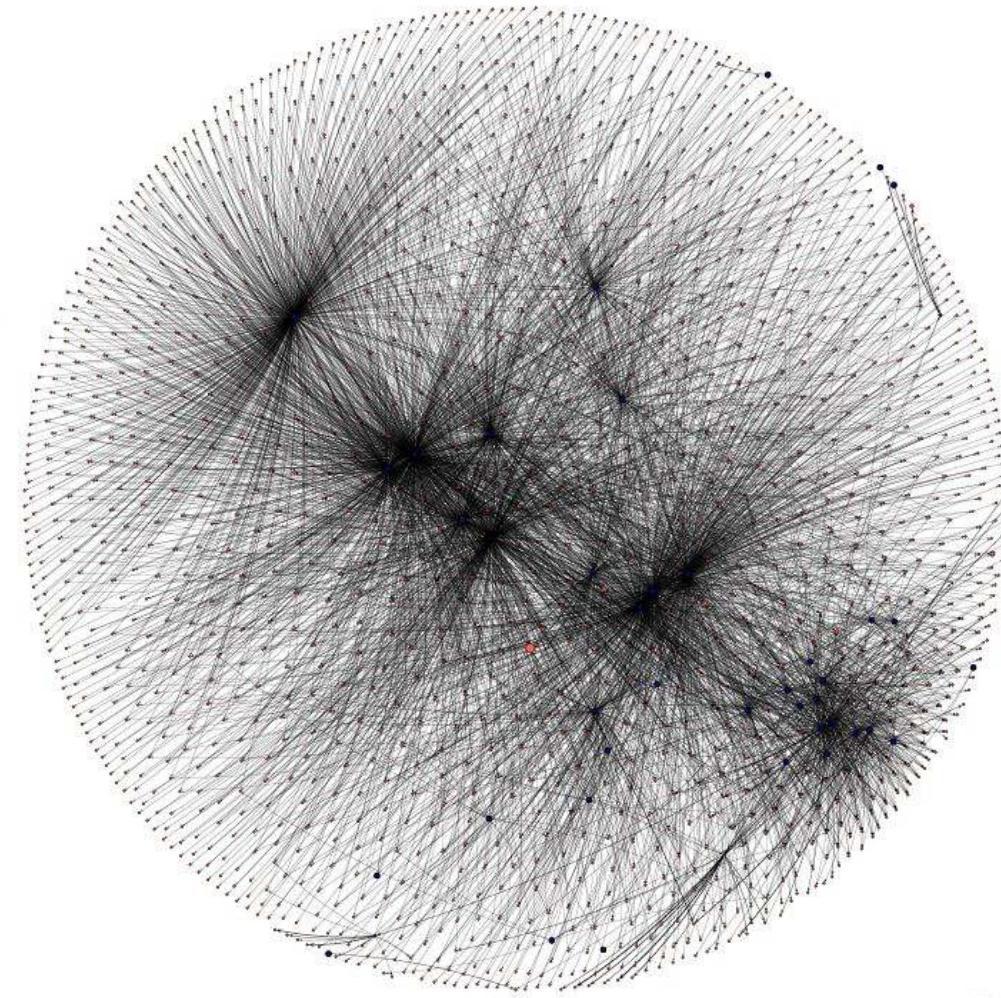
# What happens **with** structured data and standards?

The better the structure, the more chance of:

- Finding connections;
- Finding errors;
- Supporting analysis

And the lower the burden on users:

- Interpret the data
- Build reusable tools



# Schema documentation

Available at <http://standard.openownership.org>

- **Primer** - introducing key concepts
- **Data model** - high level description of data structure
- **Schema reference** - definition of fields and codelist values
- **Examples** - see how the data looks
- **About**

Beneficial Ownership Data Standard (beta) Primer Data Schema Example Data About

BETA

Search...

Data Schema

Key concepts

Schema reference

Schema browser

- Ownership or control statement
- Entity statement
- Person statement

Technical guidance

ChangeLog

Conformance and validation

Ownership or control statement

An ownership or control statement is made up of an entity, an interested party (a reference to an entity, natural person, arrangement or trust), details of the interest and provenance information for the statement.

**statementID**  
Statement identifier

**statementType**  
constant string ownershipOrControlStatement  
This should always be set to ownershipOrControlStatement.

**statementDate**  
Statement date

**subject**  
Subject

The subject of an ownership or control relationship.

**interestedParty**  
Interested party

**interests**  
array Interest  
A description of the interests held by the interestedParty covered by this statement in the entity covered by this statement.

**source**  
Source

The source of the information that links the entity and the interested party, or that supports a null statement.

**annotations**  
array Annotation  
Annotations about this statement or parts of this statement

**replacesStatements**  
Replaces statement(s)



# The data model

---

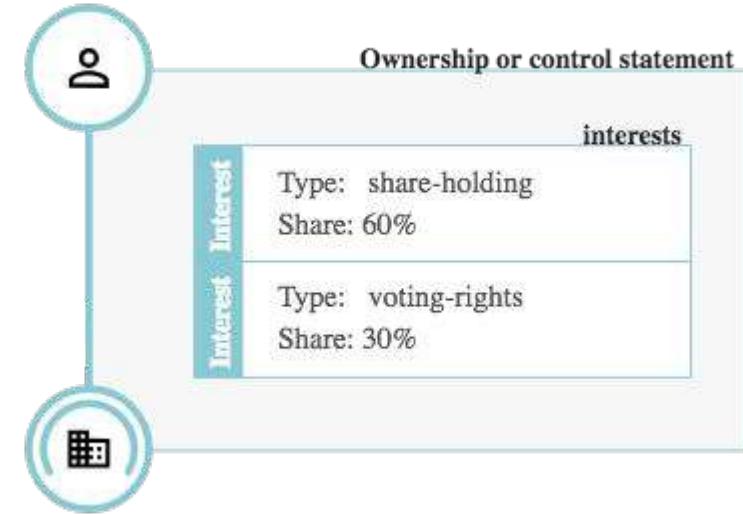
Overview

# BODS: key concepts

- Statements
- Statement identifiers
- Components
- Real-world identifiers
- Interests

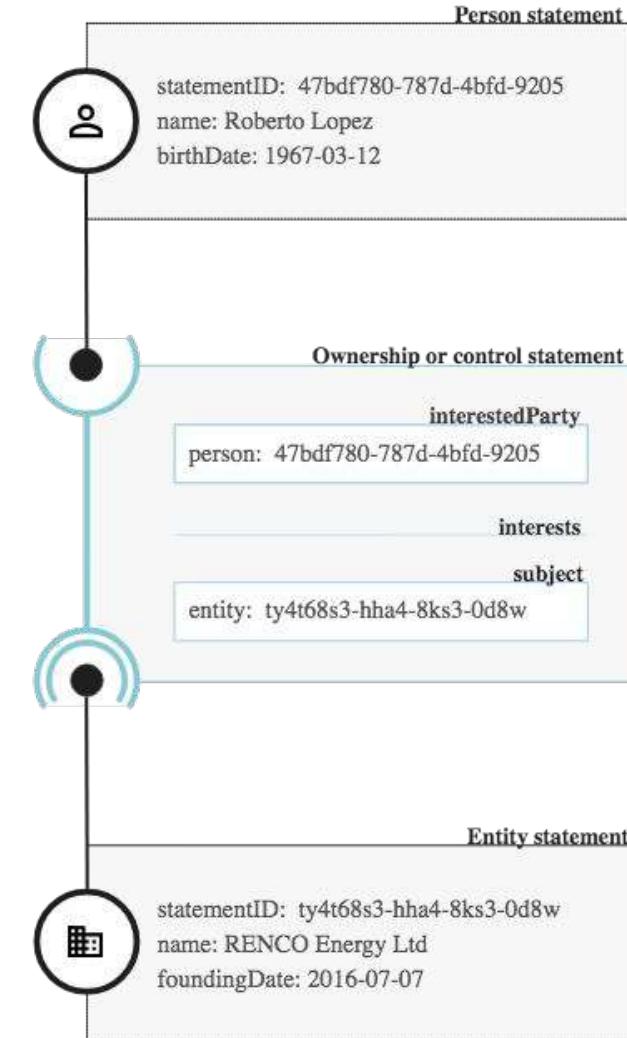
# BODS: key concepts - statements

- Statements
- Statement identifiers
- Components
- Real-world identifiers
- Interests



# BODS: key concepts - statements

- Statements
- Statement identifiers
- Components
- Real-world identifiers
- Interests



# BODS: key concepts - activity

- Statements
- Statement identifiers
- Components
- Real-world identifiers
- Interests

[...] Names

Type	'individual', 'translation', 'former', 'alias', 'aka', 'nick', 'birth'
Full name	
Family name	
Given names	
Patronymic Name	

Person statement

Statement identifier	648bd064-6c1c-4705-81cb-01e72b50f909
Statement type	personStatement
Statement date	14/07/2018
Person type	anonymousPerson
Missing information reason(s)	
[...] Names	
Type	'individual', 'translation', 'former', 'alias', 'aka', 'nick', 'birth'
Full name	
Family name	
Given names	
Patronymic Name	
[...] Identifiers	
ID	
Scheme	
Scheme name	
URI	
[...] Nationality	
Name	
Country code	
Date of birth	
Death date	
Place of birth	
Type	'birth'
Address	
Postcode	
Country	
[...] Addresses	
Type	'home', 'registered'
Address	
Postcode	
Country	
[...] Addresses	

Entity statement

Statement identifier	648bd064-6c1c-4705-81cb-01e72b50f909
Statement type	entityStatement
Statement date	14/07/2018
Type	'registeredEntity', 'entity'
Missing information reason(s)	
Entity name	
[...] Alternative names	
Incorporated in Jurisdiction	
Name	
Country code	
[...] Identifiers	
ID	
Scheme	
Scheme name	
URI	
[...] Addresses	
Type	'YYYY-MM-DD'
Founding date	
Dissolution date	
[...] Addresses	
Type	'home', 'registered'
Address	
Postcode	
Country	
[...] Addresses	

Ownership or control Statement

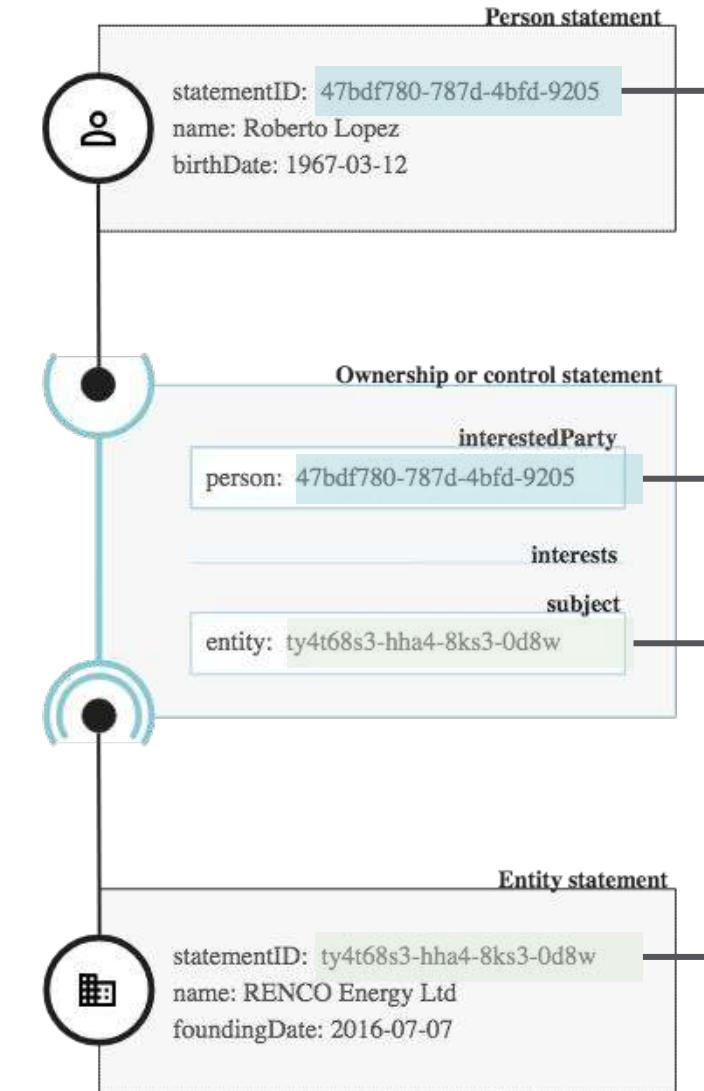
Statement Identifier	648bd064-6c1c-4705-81cb-01e72b50f909
Statement type	entityStatement
Statement date	14/07/2018
Subject	
Described by entity statement	648bd064-6c1c-4705-81cb-01e72b50f909
Interested party	
Described by entity statement	648bd064-6c1c-4705-81cb-01e72b50f909
(Or) Described by person statement	648bd064-6c1c-4705-81cb-01e72b50f909
(Or) Unspecified or unknown ownership and control	
Reason	
If required enter one of 'no-beneficial-owner', 'subject-unable-to-confirm-or-identify-beneficial-owner', 'interested-party-has-not-provided-information', 'subject-exempt-from-disclosure', 'interested-party-exempt-from-disclosure' or 'unknown'. Check code list for definitions.	
Description	
[...] Interests	
st	
Enter one of 'shareholding', 'voting-rights', 'appointment-of-board', 'influence-or-control', 'senior-managing-official', 'settlor-of-trust', 'trustee-of-trust', 'protector-of-trust', 'beneficiary-of-trust', 'other-influence-or-control-of-trust', 'rights-to-surplus-assets', 'rights-to-profit-or-income'. Check code list for definitions.	
of	'direct', 'indirect', 'unknown'
of	'true' or 'false'
is	
are	
are	
are	
sum	'true' or 'false'
sum	'true' or 'false'
te	'YYYY-MM-DD'
te	'YYYY-MM-DD'

Get a person statement sheet for each person involved in your beneficial ownership chain.

Fill in their name.

# BODS: key concepts - statement identifiers

- Statements
- Statement identifiers
- Components
- Real-world identifiers
- Interests



# BODS: key concepts - statement identifiers

- Statements
- Statement identifiers
- Components
- Real-world identifiers

Assign identifiers to all your person and entity statements

Person statement	
Statement Identifier	648bd664-6c1c-4705-81cb-01e72b50f909-p 1 - v 1
Statement type	personStatement
Statement date	16/07/2018
Person type	'anonymousPerson', 'unknownPerson', 'knownPerson'
Missing information reason(s)	

Each statement MUST have an entirely unique identifier. There MUST be no possibility of collision between identifiers for different statements.

Possible strategies for identifier creation

- Generating a [UUID](#) for each statement, storing this in internal systems, and updating it whenever the relevant record(s) that make up a statement are updated;
- Generating a [UUID](#) as a publisher-related prefix, and appending a local record identifier, and version identifier to it;
- 

Add a unique identifier to each person statement

ash function that generates N representation of the with a low collision probability.

# BODS: key concepts - statement identifiers

- Statements
- Statement identifiers
- Components
- Real-world identifiers
- Interests

## Quick quiz

What does the statement identifier identify?

- (A) A person
- (B) Information about a person
- (C) Information provided about a person by a particular source at a particular point in time

# BODS: key concepts - statement identifiers

- Statements
- Statement identifiers
- Components
- Real-world identifiers
- Interests

## Quick quiz

What does the statement identifier identify?

- (A) A person
- (B) Information about a person
- (C) Information provided about a person by a particular source at a particular point in time

# BODS: key concepts - statement identifiers

- Statements
- Statement identifiers
- Components
- Real-world identifiers
- Interests

## Quick quiz

When new information becomes available about a person you should:

- (A) Update an existing statement
- (B) Create a new statement with a new statement identifier
- (C) Publish an PDF on your website with a handwritten list of changes

# BODS: key concepts - statement identifiers

- Statements
- Statement identifiers
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## Quick quiz

When new information becomes available about a person you should:

- (A) Update an existing statement
- (B) Create a new statement with a new statement identifier
- (C) Publish an PDF on your website with a handwritten list of changes

# BODS: key concepts - components

- Statements
- Statement identifiers
- Components
- Real-world identifiers
- Interests

## Fields and codelists

Providing a set of common values to choose between.

 Person statement

Statement Identifier	648bd664-6c1c-4705-81cb-01e72b50f909-----
Statement type	personStatement
Statement date	16 / 07 / 2018
Person type	'anonymousPerson', 'unknownPerson', 'knownPerson'
Missing information reason(s)	[...]
[...] Names	Type: individual, translation, former, alias, aka, nick, birth Full name Family name Given names Patronymic Name
[...] Identifiers	ID Scheme Scheme name URI
[...] Nationality	Name Country code
Date of birth	
Death date	
Place of birth	Type: birth Address
Place of residence	Type: residence Address

# BODS: key concepts - components

- Statements
- Statement identifiers
- Components
- Real-world identifiers
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## [...] Arrays

More than one of these values can be provided.

E.g. multiple known names.

 Person statement

Statement Identifier	648bd664-6c1c-4705-81cb-01e72b50f909-----
Statement type	personStatement
Statement date	16 / 07 / 2018
Person type	'anonymousPerson', 'unknownPerson', 'knownPerson'
Missing information reason(s)	
[...] Names	
Type	'individual', 'translation', 'former', 'alias', 'aka', 'nick', 'birth'
Full name	
Family name	
Given names	
Patronymic Name	
[...] Identifiers	
ID	
Scheme	
Scheme name	
URI	
[...] Nationality	
Name	
Country code	
Date of birth	
Death date	
Place of birth	
Type	birth
Address	
Place of residence	
Type	residence
Address	

# BODS: key concepts - components

- Statements
- Statement identifiers
- Components
- Real-world identifiers
- Interests

## Quick quiz

A person can have more than one:

- Name
- Birth date
- Address
- Place of birth
- Nationality
- Identifier

# BODS: key concepts - components

- Statements
- Statement identifiers
- Components
- Real-world identifiers
- Interests

## Quick quiz

A person can have more than one:

- Name
- Birth date
- Address
- Place of birth
- Nationality
- Identifier

# BODS: key concepts - components

- Statements
- Statement identifiers
- Components
- Real-world identifiers
- Interests

## Objects

A collection of fields designed to maximise the linkability of data.

Person statement

Statement Identifier	648bd664-6c1c-4705-81cb-01e72b50f909-----
Statement type	personStatement
Statement date	16 / 07 / 2018
Person type	'anonymousPerson', 'unknownPerson', 'knownPerson'
Missing information reason(s)	[...]
Names	[...]
Type	'individual', 'translation', 'former', 'alias', 'aka', 'nick', 'birth'
Full name	
Family name	
Given names	
Patronymic Name	
Identifiers	[...]
ID	
Scheme	
Scheme name	
URI	
Nationality	[...]
Name	
Country code	
Date of birth	
Death date	
Place of birth	[...]
Type	birth
Address	
Place of residence	[...]
Type	residence
Address	

# BODS: key concepts - components: names

- Statements
- Statement identifiers
- Components
- Real-world identifiers
- Interests

[...] Names

Type	'individual', 'translation', 'former', 'alias', 'aka', 'nick', 'birth'
Full name	
Family name	
Given names	
Patronymic Name	

**Name:** Mr Roberto García Lopez  
**Known nicknames:** Beto Lopez

**Name:** Natalie Coleman PhD  
**Maiden name:** Natalie Smith

# BODS: key concepts - components: nationality

- Statements
- Statement identifiers
- Components
- Real-world identifiers
- Interests

**Tip:** Diamondia's ISO country code is 'XD'

[...] Nationality

Name	<input type="text"/>
Country code	<input type="text"/>

**Name:** Mr Roberto García Lopez

**Known nicknames:** Beto Lopez

**Nationality:**

- Diamondian
- United States

**Name:** Natalie Coleman PhD

**Maiden name:** Natalie Smith

**Nationality:**

- United Kingdom

# BODS: key concepts - components: dates

- Statements
- Statement identifiers
- Components
- Real-world identifiers
- Interests

Date of birth	<input type="text"/>
Death date	<input type="text"/>

Gregorian ISO 8601 standard. Partial dates allowed.

YYYY-MM-DD

**Name:** Mr Roberto García Lopez

**Known nicknames:** Beto Lopez

**Nationality:**

- Diamondian
- United States

**Date of birth:** 21st Jan 1967

**Name:** Natalie Coleman PhD

**Maiden name:** Natalie Smith

**Nationality:**

- United Kingdom

**D.O.B:** 05/04/79

# BODS: key concepts - components: dates

- Statements
- Statement identifiers
- Components
- Real-world identifiers
- Interests

## Quick quiz

A web form for entering dates should:

- Always ask the user to enter the date in ISO 8601 YYYY-MM-DD format
- Allow the user to enter the date in free text and output whatever they enter in the published data
- Use a form designed for the particular kind of date being entered, and the local context - but convert the date into ISO format when exporting data.

# BODS: key concepts - components: dates

- Statements
- Statement identifiers
- Components

## What is your date of birth?

For example, 31 3 1980

Date of birth must be in the past

Day      Month      Year

6	3	2076
---	---	------

<https://design-system.service.gov.uk/components/date-input/>

### Quick quiz

A web form for entering dates should:

- Always ask the user to enter the date in ISO 8601 YYYY-MM-DD format
- Allow the user to enter the date in free text and output whatever they enter in the published data
- Use a form designed for the particular kind of date being entered, and the local context - but convert the date into ISO format when exporting data.

# BODS: key concepts - components

## Components: key messages

The schema defines a set of components for representing data.

These are designed to accommodate data from different countries and contexts.

Think about how the data you collect could map to these components.

Think about whether your data collection design makes assumptions that may not be globally applicable. Use the components and codelists as a reference resource for this.

Design data input around users, and data representation around interoperability.

# BODS: key concepts - components: activity

The screenshot shows a user interface for filling out BODS statements. It features two main sections side-by-side:

- Person statement:** This section contains fields for identifying a person, including Statement Identifier, Statement type (personStatement), Statement date (16/07/2018), Person type ('anonymousPerson', 'unknown'), and Missing information reason(s). It also includes sections for Names (Full name, Family name, Given names, Patronymic Name) and Identifiers (ID, Scheme, Scheme name, URI).
- Entity statement:** This section contains fields for identifying an entity, including Statement Identifier, Statement type (entityStatement), Statement date (16/07/2018), Type ('registeredEntity', 'legalEntity', 'arrangement', 'anonymousEntity', 'unknownEntity'), and Missing information reason(s). It includes sections for Entity name, Alternative names, Incorporated In Jurisdiction (Name, Country code), and Identifiers (ID, Scheme, Scheme name, URI). It also includes fields for Founding date and Dissolution date.

Both sections have a '... Addresses' component at the bottom, which includes fields for Type ('home', 'registered', 'service', 'alternative'), Address, Postcode, and Country.

Make sure you have a statement form for each **person** or **company** in your beneficial ownership diagram.

Fill in any details you can **except** the [...] identifiers component.

# BODS: key concepts - components: activity

The screenshot shows a 'Person statement' form with the following fields:

- Statement Identifier:** 648bd664-6c1c-4705-81cb-01e72b50f909-\_\_\_\_\_
- Statement type:** personStatement
- Statement date:** 16 / 07 / 2018
- Person type:** 'anonymousPerson', 'unknownPerson'
- Missing information reason(s):** [...]
- [...] Names:**
  - Type: 'individual', 'translation', 'former', 'alias', 'aka', 'nick', 'birth'
  - Full name
  - Family name
  - Given names
  - Patronymic Name
- [...] Identifiers:**
  - ID
  - Scheme
  - Scheme name
  - URI
- [...] Nationality:**
  - Name
  - Country code

**Did anyone create an 'unknownPerson' statement?**

ement form  
ny in your  
m.  
xcept the

# BODS: key concepts - real world identifiers



## Entity statement

Statement Identifier 648bd664-6c1c-4705-81cb-01e72b50f909-c\_1\_v\_1

Statement type entityStatement

Statement date 16/07/2018

Type registeredEntity

Missing information

reason(s)

Entity name RENCO Energy Ltd

Renco Energy Ltd

### Incorporated In Jurisdiction

Name Diamondia

Country code XD

### [...] Identifiers

ID

Scheme

Scheme name

URI



## Entity statement

Statement Identifier 648bd664-6c1c-4705-81cb-01e72b50f909-c\_2\_v\_1

Statement type entityStatement

Statement date 16/07/2018

Type registeredEntity

Missing information

reason(s)

Entity name Renco

Renco

### Incorporated In Jurisdiction

Name Diamondia

Country code XD

### [...] Identifiers

ID

Scheme

Scheme name

URI

Are these statements about the same company?

# BODS: key concepts - real world identifiers



## Entity statement

Statement Identifier 648bd664-6c1c-4705-81cb-01e72b50f909-c\_1\_v.1

Statement type entityStatement

Statement date 16 / 07 / 2018

Type registeredEntity

### Missing information

reason(s)

Entity name RENCO Energy Ltd

Renco Energy Ltd

### Incorporated In Jurisdiction

Name Diamondia

Country code XD

### [...] Identifiers

ID 65462342

Scheme

Scheme name

URI

65462342



## Entity statement

Statement Identifier 648bd664-6c1c-4705-81cb-01e72b50f909-c\_3\_v.2

Statement type entityStatement

Statement date 16 / 07 / 2018

Type registeredEntity

### Missing information

reason(s)

Entity name RELTD

RE LTD

### Incorporated In Jurisdiction

Name

Country code

### [...] Identifiers

ID 65462342

Scheme

Scheme name

URI

65462342

What about these statements?

# BODS: key concepts - real world identifiers

 **Entity statement**

Statement Identifier	648bd664-6c1c-4705-81cb-01e72b50f909-c_1_v_1
Statement type	entityStatement
Statement date	16/07/2018
Type	registeredEntity
Missing information reason(s)	
Entity name	RENCO Energy Ltd

**Incorporated In Jurisdiction**

Name	Diamondia
Country code	XD

**[...] Identifiers**

ID	65462342
Scheme	XE-DI-CR
Scheme name	
URI	

 **Entity statement**

Statement Identifier	648bd664-6c1c-4705-81cb-01e72b50f909-c_2_v_1
Statement type	entityStatement
Statement date	16/07/2018
Type	registeredEntity
Missing information reason(s)	
Entity name	Renco

**Incorporated In Jurisdiction**

Name	Diamondia
Country code	XD

**[...] Identifiers**

ID	65462342
Scheme	XE-DI-CR
Scheme name	
URI	

**When we know which register an identifier is from, and the identifier, we can make high confidence matches between statements.**

# BODS: key concepts - real world identifiers

- Statements
- Statement identifiers
- Components
- **Real-world identifiers**
- Interests

## Group survey

Do you collect **company identifiers** in your beneficial ownership register or forms?

# BODS: key concepts - real world identifiers

- Statements
- Statement identifiers
- Components
- **Real-world identifiers**
- Interests

## Group survey

Do you collect **company identifiers** in your beneficial ownership register or forms?

Do you collect **company identifiers** for overseas companies?

# BODS: key concepts - real world identifiers

- Statements
- Statement identifiers
- Components
- **Real-world identifiers**
- Interests

## To find identifiers

BODS uses a codelist from org-id.guide - **an open register of identifier lists**.



org-id.guide

I need identifiers for A company ▾

Registered in Afghanistan ▾

Working in Any sector ▾

SEE LISTS

# BODS: key concepts - real world identifiers: activity

The screenshot shows a form titled "Entity statement". It includes fields for Statement Identifier (with value 648bd664-6c1c-4705-81cb-01e72b50f909), Statement type (entityStatement), Statement date (16/07/2018), Type ('registeredEntity', 'legalEntity', 'arrangement', 'anonymousEntity', 'unknownEntity'), Missing information reason(s) (empty), Entity name (empty), [...] Alternative names (empty), Incorporated In Jurisdiction (Name empty, Country code empty), [...] Identifiers (ID empty, Scheme empty, Scheme name empty, URI empty), Founding date (YYYY-MM-DD empty), Dissolution date (YYYY-MM-DD empty), [...] Addresses (Type ('home', 'registered', 'service', 'alternative') empty, Address empty, Postcode empty, Country empty).

Look at your entity statements, and your source documents.

Use a copy of the org-id.guide register to fill in ID, Scheme and Schema Name fields for each entity.

**Extra task:** Look for identifier sources in your country in <http://org-id.guide>

Does the codelist need updating?

# BODS: key concepts - real world identifiers

- Statements
- Statement identifiers
- Components
- **Real-world identifiers**
- Interests

## Identifiers for people

- If you have a persistent ***internal*** identifier, provide this.
- If you have ***public*** known identifiers for a person, provide these (and work with BODS to update the schema codelist)
- Be careful of ***private*** identifiers that should not be included in open data.

# BODS: key concepts - real-world identifiers

## Real world identifiers: key messages

Collect company numbers, and details of the register the company number is from.

Publish company numbers and a schema/list code from org-id.guide.

Provide persistent identifiers for people where available.

Assess privacy implications of releasing other person identifiers.

Work with BODS on improving identifier source codelists for companies and people.

# BODS: key concepts - interests

- Statements
- Statement identifiers
- Components
- Real-world identifiers
- Interests

## Ownership or control statements can

- Link entities and people
- Link entities to other entities
- Describe missing ownership or control information

<b>Subject</b>	<b>Described by entity statement</b>	648bd664-6c1c-4705-81cb-01e72b50f909-
<b>Interested party</b>	<b>Described by entity statement</b>	648bd664-6c1c-4705-81cb-01e72b50f909-
	<b>(Or) Described by person statement</b>	648bd664-6c1c-4705-81cb-01e72b50f909-
<b>(Or) Unspecified or unknown ownership and control</b>		
<b>Reason</b>	If required enter one of 'no-beneficial-owners', 'subject-unable-to-confirm-or-identify-beneficial-owner', 'interested-party-has-not-provided-information', 'subject-exempt-from-disclosure', 'interested-party-exempt-from-disclosure' or 'unknown'. Check codelist for definitions.	
<b>Description</b>		

# BODS: key concepts - interests: activity

- Statements
- Statement identifiers
- Components
- Real-world identifiers
- Interes

Fill in the **Subject** and **Interested Party** of an Ownership or Control statement for each relationship you have identified.

## Ownership or control statements can

- Link entities and people
- Link entities to other entities
- Describe missing ownership or control information

Subject  
Described by entity statement

Interested party  
Described by entity statement   
(Or) Described by person statement

(Or) Unspecified or unknown ownership and control  
Reason   
If required enter one of 'no-beneficial-owners', 'subject-unable-to-confirm-or-identify-beneficial-owner', 'interested-party-has-not-provided-information', 'subject-exempt-from-disclosure', 'interested-party-exempt-from-disclosure' or 'unknown'. Check codelist for definitions.

Description

# BODS: key concepts - reasons for no identified control

- Statements
- Statement identifiers
- Components
- Real-world identifiers
- Interests

UnspecifiedReason		
code	title	description
no-beneficial-owners	No beneficial owners	There are no beneficial owners who need to disclose ownership according to the rules under which this statement is made.
subject-unable-to-confirm-or-identify-beneficial-owner	Subject unable to confirm or identify beneficial owner	The subject of this ownership or control statement has, as the disclosing party, been unwilling or unable to confirm the existence of a beneficial owner.
interested-party-has-not-provided-information	Interested party has not provided information	The interested party in this ownership or control statement has not provided enough information to identify or confirm the identity of the beneficial owner.
subject-exempt-from-disclosure	Subject exempt from disclosure	The subject of this ownership or control statement is not required to disclose its beneficial owner. (Replaces noNotifiableOwners.)
interested-party-exempt-from-disclosure	Interested party exempt from disclosure	The interested party in this ownership or control statement is exempt from having their identity disclosed.
unknown	Unknown reason	The reason an interested party cannot be provided is not known.

# BODS: key concepts - interests

- Statements
- Statement identifiers
- Components
- Real-world identifiers
- Interests

An ownership or control statement can describe one or more interests of the interested party in the subject.

[...] Interests

Type of interest	<input type="text"/>
Enter one of 'shareholding', 'voting-rights', 'appointment-of-board', 'influence-or-control', 'senior-managing-official', 'settlor-of-trust', 'trustee-of-trust', 'protector-of-trust', 'beneficiary-of-trust', 'other-influence-or-control-of-trust', 'rights-to-surplus-assets', 'rights-to-profit-or-income'. Check codelist for definitions.	
Interest level	<input type="text"/> 'direct', 'indirect', 'unknown'
Beneficial ownership or control	<input type="text"/> 'true' or 'false'
Details	<input type="text"/>
Exact share	<input type="text"/>
Maximum share	<input type="text"/>
Minimum share	<input type="text"/>
Exclusive minimum	<input type="text"/> 'true' or 'false'
Exclusive maximum	<input type="text"/> 'true' or 'false'
State date	<input type="text"/> YYYY-MM-DD
End date	<input type="text"/> YYYY-MM-DD

# BODS: key concepts - interests: activity

- Statements
- Statement identifiers
- Components
- Real-world identifiers

Fill in your templates with details of the interests held.

An ownership or control statement can describe one or more interests of the interested party in the subject.

[...] Interests

Type of interest	<input type="text"/>
Enter one of 'shareholding', 'voting-rights', 'appointment-of-board', 'influence-or-control', 'senior-managing-official', 'settlor-of-trust', 'trustee-of-trust', 'protector-of-trust', 'beneficiary-of-trust', 'other-influence-or-control-of-trust', 'rights-to-surplus-assets', 'rights-to-profit-or-income'. Check codelist for definitions.	
Interest level	'direct', 'indirect', 'unknown'
Beneficial ownership or control	'true' or 'false'
Details	<input type="text"/>
Exact share	<input type="text"/>
Maximum share	<input type="text"/>
Minimum share	<input type="text"/>
Exclusive minimum	'true' or 'false'
Exclusive maximum	'true' or 'false'
State date	YYYY-MM-DD
End date	YYYY-MM-DD



# Congratulations!

---

You have created structured beneficial ownership data

```
[  
 {  
 "statementID": "3ff64336-9d26-49da-b0ce-f4685c6af139",  
 "statementType": "entityStatement",  
 "entityType": "registeredEntity",  
 "name": "REN Consulting Limited",  
 "identifiers": [  
 {  
 "scheme": "XE-KS-SRC",  
 "id": "93821344"  
 }  
 ],  
 "statementID": "5eb1e15c-fd25-40c7-8a75-246c79654185",  
 "statementType": "personStatement",  
 "name": "Natalie Coleman"  
 },  
 {  
 "statementID": "487e303b-f5be-4dc2-bcae-b0803546fa29",  
 "statementType": "ownershipOrControlStatement",  
 "subject": {  
 "describedByEntityStatement": "3ff64336-9d26-49da-b0ce-f4685c6af139"  
 },  
 "interestedParty": {  
 "describedByPersonStatement": "5eb1e15c-fd25-40c7-8a75-246c79654185"  
 },  
 "interests": [  
 {  
 "type": "shareholding",  
 "interestLevel": "direct",  
 "share": {  
 "minimum": 25,  
 "maximum": 50  
 },  
 "startDate": "2016-07-07"  
 },  
 {  
 "type": "voting-rights",  
 "interestLevel": "direct",  
 "share": {  
 "minimum": 25,  
 "maximum": 50  
 },  
 "startDate": "2016-07-07"  
 }  
 ]  
 }
```

```
[  
 {  
 "statementID": "1dc0e987-5c57-4aic-b3ad-61353b66a9b7",  
 "statementType": "entityStatement",  
 "statementDate": "2017-11-18",  
 "entityType": "registeredEntity",  
 "name": "CHRINON LTD",  
 "foundingDate": "2010-11-18",  
 "identifiers": [  
 {  
 "scheme": "GB-COH",  
 "id": "07444723"  
 }  
 ],  
 "statementID": "019a93f1-e470-42e9-957b-03559861b2e2",  
 "statementType": "personStatement",  
 "statementDate": "2017-11-18",  
 "personType": "KnownPerson",  
 "nationalities": [  
 {  
 "code": "GB"  
 }  
 ],  
 "names": [  
 {  
 "type": "individual",  
 "fullName": "Christopher Taggart",  
 "givenName": "Christopher",  
 "familyName": "Taggart"  
 },  
 {  
 "type": "aka",  
 "fullName": "Chris Taggart"  
 },  
 "birthDate": "1964-04",  
 "addresses": [  
 {  
 "type": "service",  
 "address": "Aston House, Cornwall Avenue, London",  
 "country": "GB",  
 "postCode": "N3 1LP"  
 }  
 ],  
 "statementID": "676ce2ec-e244-409e-85f9-9823e88bc099",  
 "statementType": "ownershipOrControlStatement",  
 "statementDate": "2018-01-05",  
 "subject": {  
 "describedByEntityStatement": "1dc0e987-5c57-4aic-b3ad-61353b66a9b7"  
 },  
 "interestedParty": {  
 "describedByPersonStatement": "019a93f1-e470-42e9-957b-03559861b2e2"  
 },  
 "interests": [  
 {  
 "type": "shareholding",  
 "interestLevel": "direct",  
 "beneficialOwnershipOrControl": true,  
 "startDate": "2016-04-06",  
 "share": {  
 "exact": 50  
 }  
 }  
 ],  
 "replaceStatements": [  
 "fbfd0547-d0c6-4a00-b559-5c5e91c34f5c"  
 ]  
 }
```

Data that is ready for processing.

Data with much less ambiguity.

Data that maximises the chance of connections being made.

Data that turns **policy into practice**.

# BODS: recap

## BODS Recap

Everything in BODS is a **statement**

Statements are linked by **statement identifiers**

Each statement is made up of structured data **components**

It is easier to link data when person and entity statements contain **real world identifiers**

**Ownership or control statements** describe the relationship between a person and a company (or other entities) and the interest they hold



The Global Beneficial Ownership Register

# End of session

# OPEN OWNERSHIP

The Global Beneficial Ownership Register

Collecting data on beneficial ownership: aligning policy and technology



[www.openownership.org](http://www.openownership.org)



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**1: Commit**

Secure political support. Determine scope. Identify legislative or policy changes required.

**2: User focus**

Identify key local drivers for data use. Engage data users early. Build skills for user-centred design.

**3: Data & design**

Map new or existing systems to BODS. Set-up mechanisms for structured, granular & changing data.

**4: Business process**

Establish business process for data entry, updates & validation. Design and test forms.

**5: Publication**

Set a license. Provide APIs and bulk data. Establish feedback loops to improve data.

**6: Maintenance**

Data cleaning and improvements. Make sure register is updated. Remove redacted data.

# The implementation journey

A dark wooden surface with several small bowls containing various dried ingredients like rice and beans.

You can only get out,  
what you put in

# Collection and publication

## Seven key decisions

1. Types of interest
2. Thresholds
3. Ultimate ownership vs. capturing the chain
4. Missing data & exclusions
5. Identifiers
6. Historical data
7. Source documents

The screenshot shows a Companies House Annual Return (AR01) document for MONSOON LIMITED. The document includes sections for 'Statement of Capital (Totals)', 'Full Details of Shareholders', and company details like 'Company Name: MONSOON LIMITED' and 'Company Number: 02588514'. A barcode is also present. To the right of the document, a JSON object represents the data extracted from the document, detailing statements about entity types, group IDs, statement dates, and specific identifiers for entities like 'DRILLGREAT LIMITED'.

```
... {  
  "statementID": "938gj2vv-68gh-k67w-pp03-94uffjwgd45a",  
  "statementType": "entityStatement",  
  "groupID": "a03fe48z-ab3b-44e3-gfd5-45pl5930h394",  
  "statementDate": "2016-06-06",  
  "entityType": "registeredEntity",  
  "entity": "DRILLGREAT LIMITED",  
  "foundingDate": "2007-06-26",  
  "identifiers": [  
    {  
      "scheme": "GB-COH",  
      "id": "06292597",  
      "validationType": "strict"  
    }  
  ],  
  ...  
  "statementID": "jky857dh-235d-00ut-186h-0pr5tghj341",  
  "statementType": "beneficialOwnershipStatement",  
  "groupID": "a03fe48z-ab3b-44e3-gfd5-45pl5930h394",  
  "statementDate": "2016-06-06",  
  "subject": "MONSOON LIMITED",  
  "entity": {  
    "type": "entityStatement",  
    "describedByStatement": "5748fgey-3fg7-j78k-8j8d-14l09hh36fs6"  
  },  
  "interestedParty": {  
    "type": "entityStatement",  
    "describedByStatement": "938gj2vv-68gh-k67w-pp03-94uffjwgd45a"  
  },  
  "interests": [  
    {  
      "type": "shareholding",  
      "interestLevel": "direct",  
      "share": {  
        "exact": 90.7  
      }  
    },  
    {  
      "type": "voting-rights",  
      "interestLevel": "direct",  
      "share": {  
        "exact": 99.99  
      }  
    }  
  ]  
}
```

# (1) Types of interest

**Which types of interest do you,  
or will you, collect information  
on?**



# (1) Types of interest: companies

**Which types of interest do you, or will you, collect information on?**

## Ownership

ownership of shares

rights over income or profits

rights to assets

## Control

voting rights

influence or control of firm

## Other

senior managing official

# (1) Types of interest: companies

## Why does it matter?



When beneficial owners have to disclose interests in detail, it is harder to disguise control.

For example, in the situation where a company owner gifted the **legal ownership** of the business to a relative, but retained significant influence over strategic direction and day-to-day activities, a robust disclosure regime might require a ‘significant influence or control’ interest to be declared by the original owner.

# (1) Types of interest: trusts

What about interests in trusts?

## Trusts

beneficiary

trustee

protector

settlor

senior managing official

See the **InterestType** codelist for the exact codes available in BODS.

# (1) Types of interest: whose interests?

**Whose interests are recorded?**

What kinds of entities should declare beneficial owners?

- Registered companies
- Partnerships
- Trusts
- Companies listed on stock exchanges

Who gets declared as a beneficial owner:

- Native beneficial owners
- Non-native beneficial owners

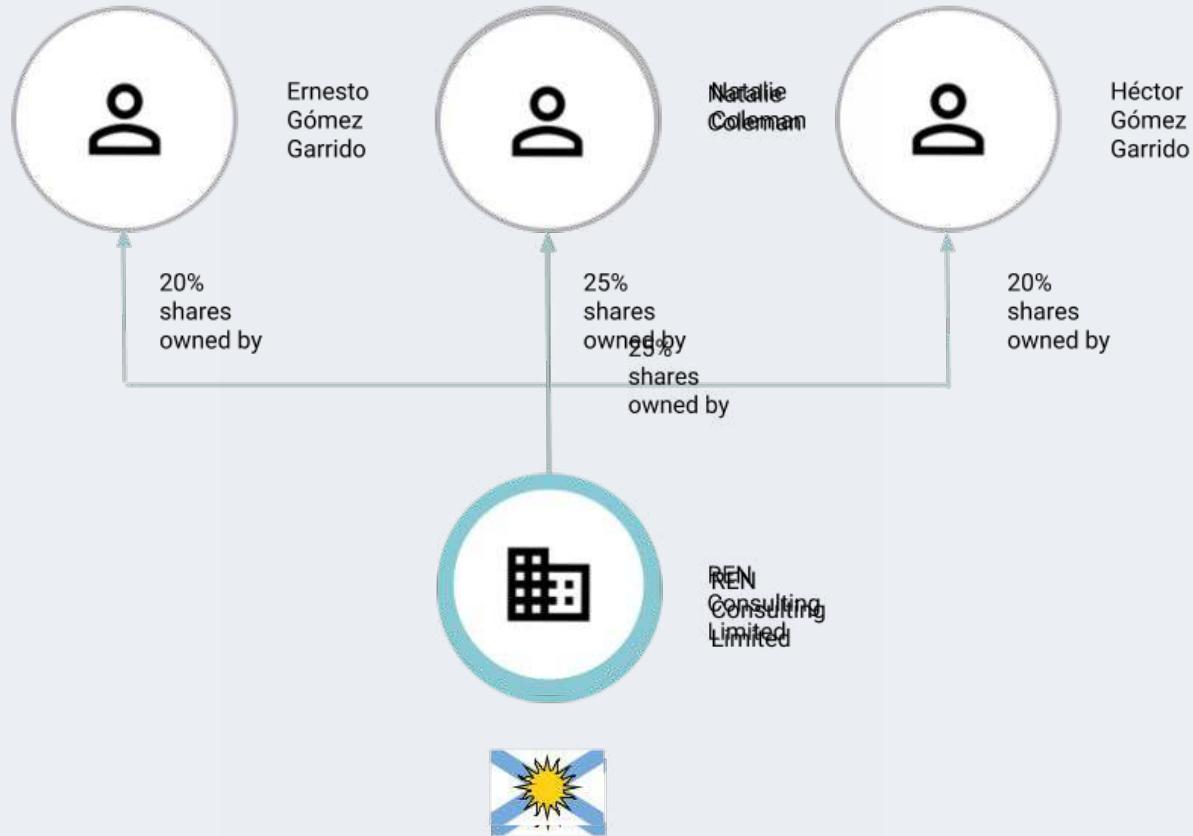
## (2) Thresholds

**What threshold have you, or will you, set for beneficial ownership disclosure?**

**Do you collect exact interests, or bands?**



## (2) Thresholds: what impact does it have?



Beneficial owners must declare an interest at:

**25% ownership**

## (2) Thresholds

What threshold have you, or will you, set for beneficial ownership disclosure?

Do you collect exact interests, or bands?



**OpenOwnership** sets no minimum threshold for beneficial ownership disclosures and collects exact percentages.

**BODS** can express both exact and banded interests, and sets no minimum on what can be disclosed.

## (2) Thresholds: making a decision

**What threshold have you, or will you, set for beneficial ownership disclosure?**

**Do you collect exact interests, or bands?**

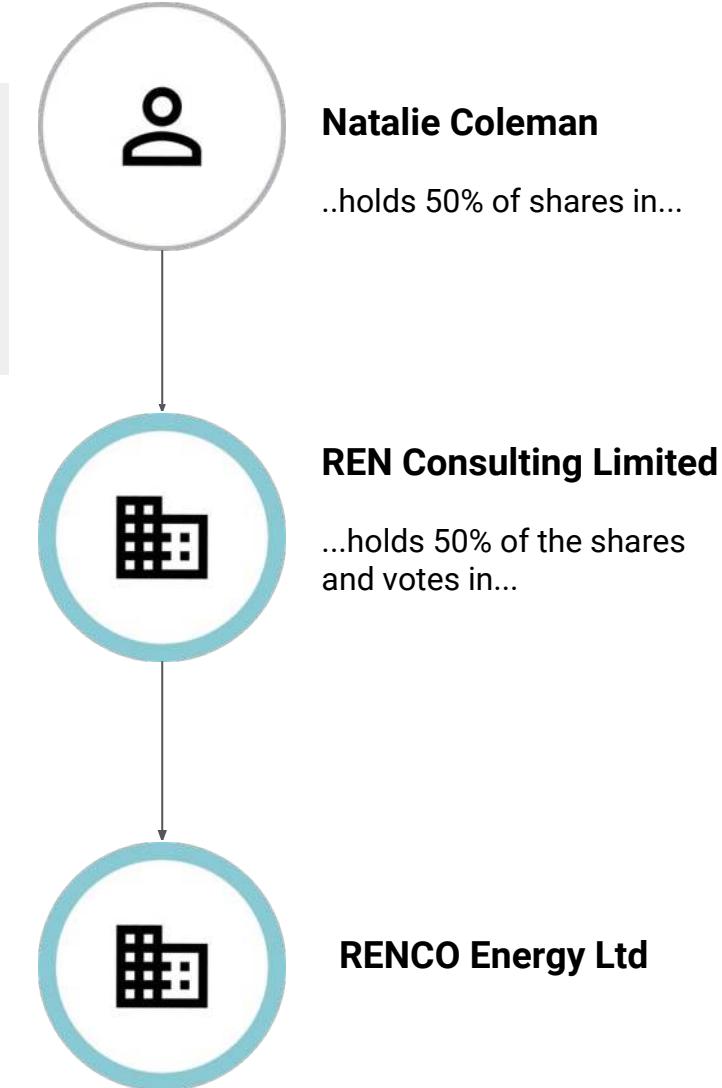
**Can data help you decide?**

- How many firms would be affected by a low threshold?
- What kind of firms are these?
- Is it useful for the firms to know?
- Which potential uses of data might be prevented by a high threshold?

# (3) Indirect or direct control

Will you collect information on intermediate steps in the ownership chain?

What should  
Renco Energy Ltd  
disclose?

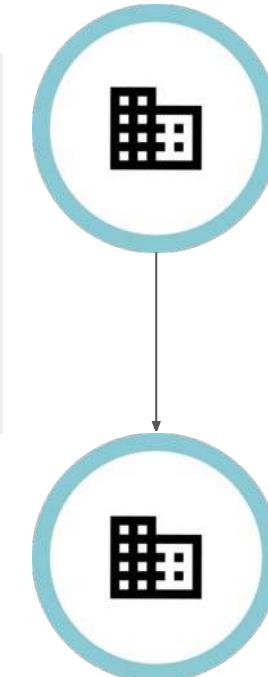


# (3) Indirect or direct control

Will you collect information on intermediate steps in the ownership chain?

Option 1: Just the next company.

... or nothing if there is already an open corporate registry that contains this?



**REN Consulting Limited**

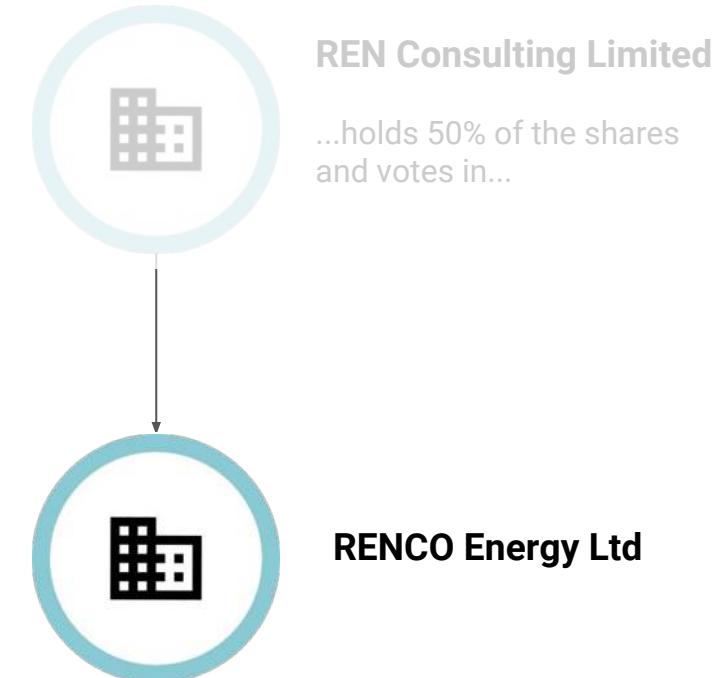
...holds 50% of the shares and votes in...

**RENCO Energy Ltd**

# (3) Indirect or direct control

Will you collect information on intermediate steps in the ownership chain?

Option 1: just the next **onshore** company.



# (3) Indirect or direct control

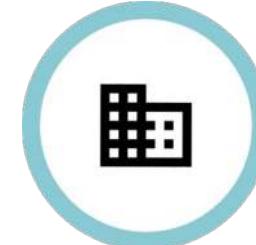
Will you collect information on intermediate steps in the ownership chain?

Option 2: just the ultimate beneficial owner



**Natalie Coleman**

..holds a 25% (indirect) interest in...



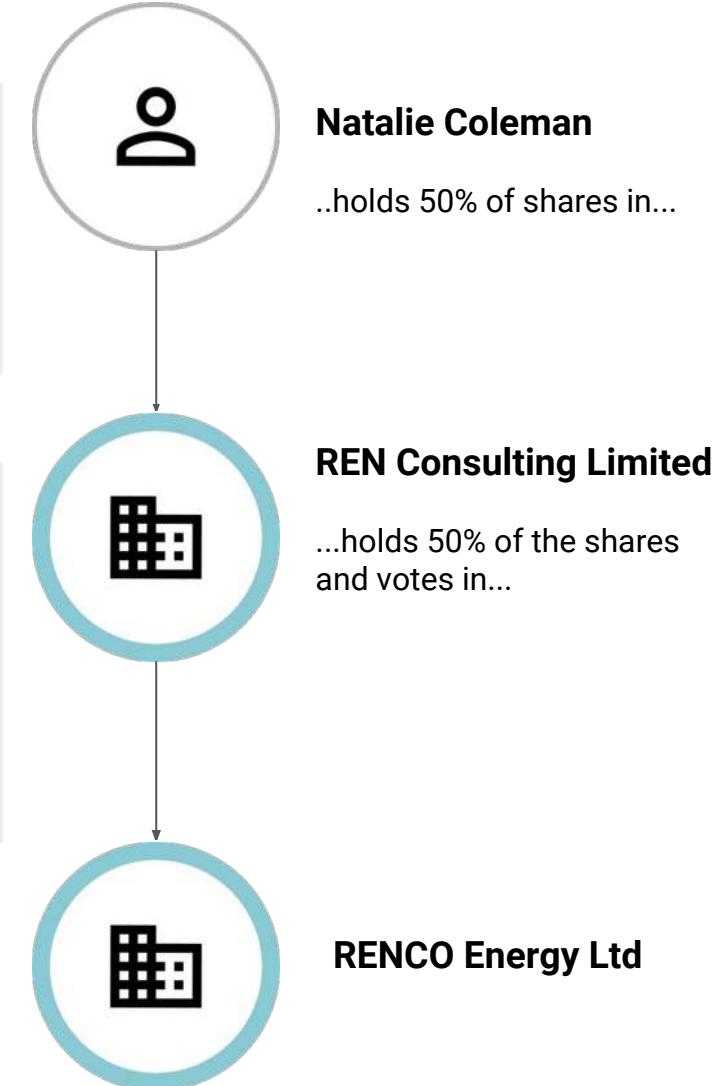
**RENCO Energy Ltd**

# (3) Indirect or direct control

Will you collect information on intermediate steps in the ownership chain?

Option 3: the beneficial ownership chain

...self-reported or imported from existing data to be confirmed by submitter.



# (3) Indirect or direct control

Will you collect information on intermediate steps in the ownership chain?

Direct links, and full ownership chains, open up a wider range of use cases.

The reporting burden this creates will depend on the design of business processes.

BODS can accommodate a mixed model with direct, indirect and unknown levels of interest.



2: User focus

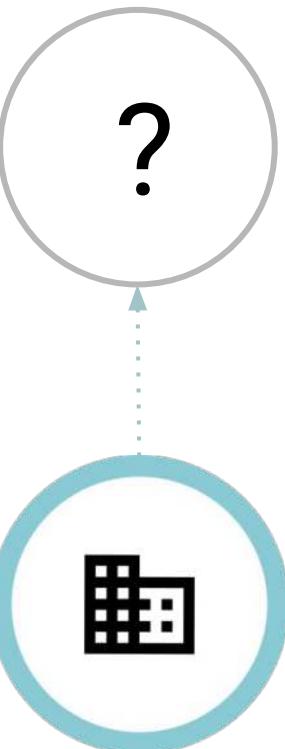
3: Data & design

4: Business process

# (4) Missing data & exclusions

**What reasons are there for not knowing a beneficial owner?**

Unspecified owner



RENCO  
Holding  
Company

# (4) Missing data & exclusions

**What reasons are there for not knowing a beneficial owner?**

It is important for verification purposes to know the particular reason.

## BODS 'UnspecifiedReason' codelist

---

No beneficial owners

---

Subject unable to confirm or identify beneficial owner

---

Interested party has not provided information

---

Subject exempt from disclosure

---

Interested party exempt from disclosure

---

Unknown reason

---

# (4) Missing data & exclusions

**What reasons are there for not  
*disclosing* a beneficial owner?**

# (4) Missing data & exclusions

## What reasons are there for not disclosing a beneficial owner?

OpenOwnership believe there should be **limited** and **strict** reasons for exemption.

When exemptions are used, information about the exemption should be published.

Non-disclosure doesn't mean disappearing - it means limited anonymity.

<b>personType</b>	string
Person type	Use the <a href="#">personType codelist</a> . The ultimate beneficial owner of a legal entity is always a natural person. Where the beneficial owner has been identified, but information about them cannot be disclosed, use 'anonymousPerson'. Where the beneficial owner has not been clearly identified, use 'unknownPerson'. Where the beneficial owner has been identified use knownPerson.

# (5) Identifiers

Which identifiers and identifying information will you collect, and validate?

## For organisations

- Do you only need to identify national companies? Or also international? What about other entities (trusts, etc.)

## For people

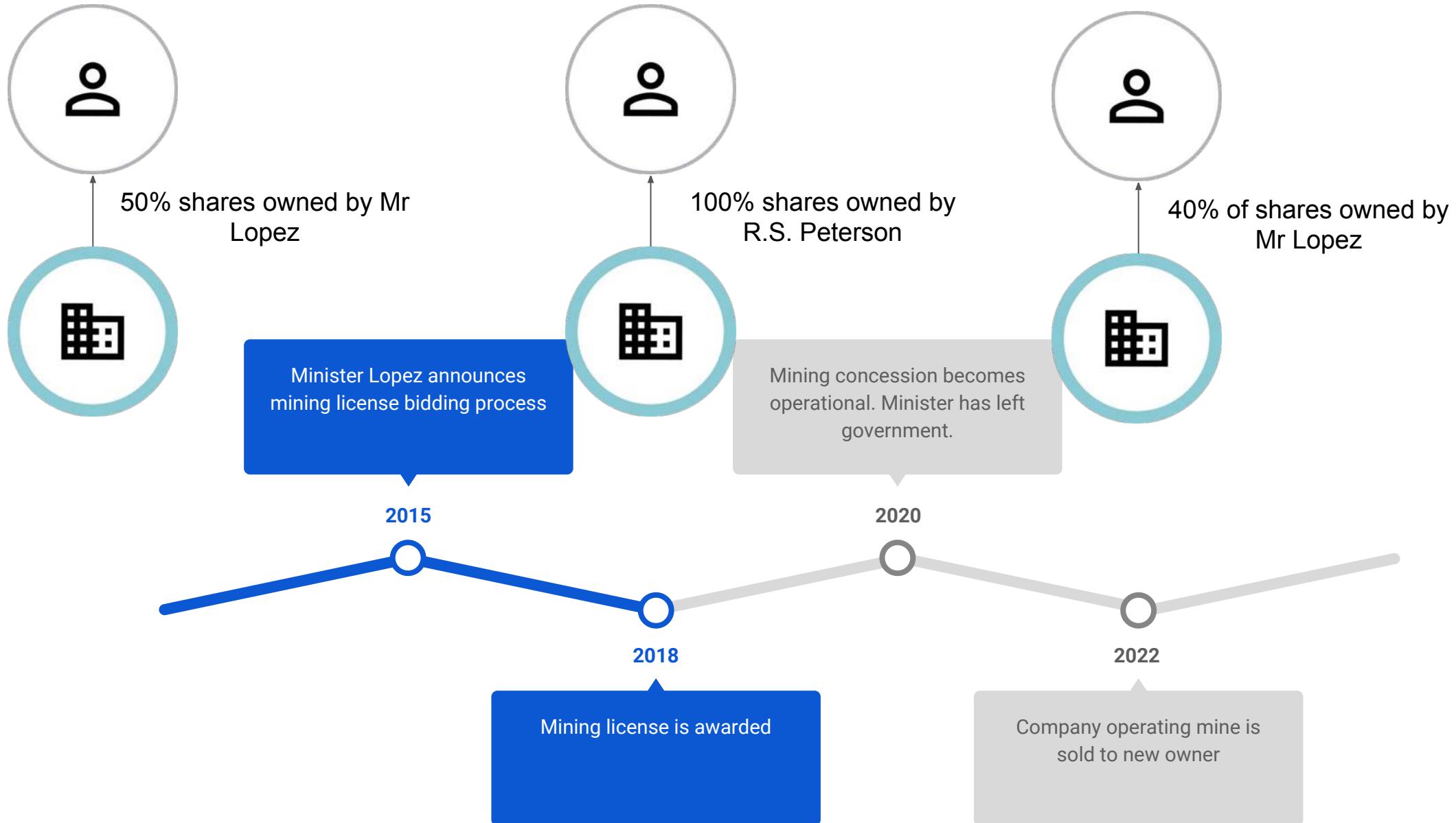
- Are you empowered to collect biographical data? (Name, date of birth, place of birth, identifiers, nationality)
- Can you publish this?

# (6) Historical data

**How long should data be available for?**

**A:** Identify as many reasons as you can for data to be made available long term.

**B:** Identify as many reasons as you can for data to be removed after a short set period.



# (6) Historical data

## How long should data be available for?

**BODS** is based on the idea of **immutable statements** - creating an updated ledger of claims about beneficial ownership over time.

With a collection of BODS data it should be possible to ‘rewind’ to understand what was known about ownership and control at a particular point in time in the past.

OpenOwnership believes there is a legitimate legal basis for maintaining a long-term archive of beneficial ownership data.

# (6) Historical data

**How long will data be available for?**

**Will you maintain an archive of past data - with immutable statements?**

## Consider

When data is under an **open license** you cannot *technically* control its redistribution.

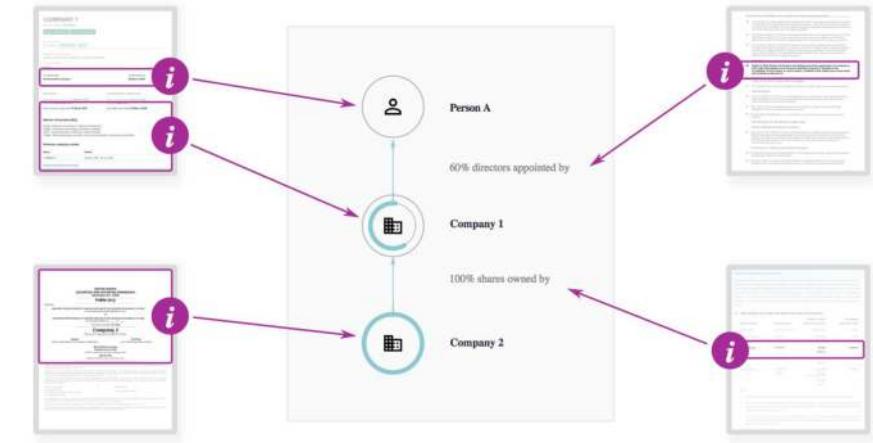
However, laws covering how data can be used still apply.

Though data can travel across borders, and laws vary from country to country.

**Open Ownership have commissioned research that will address some of these issues.**

# (7) Source documents

**Will you store, verify and provide access to, source documents?**



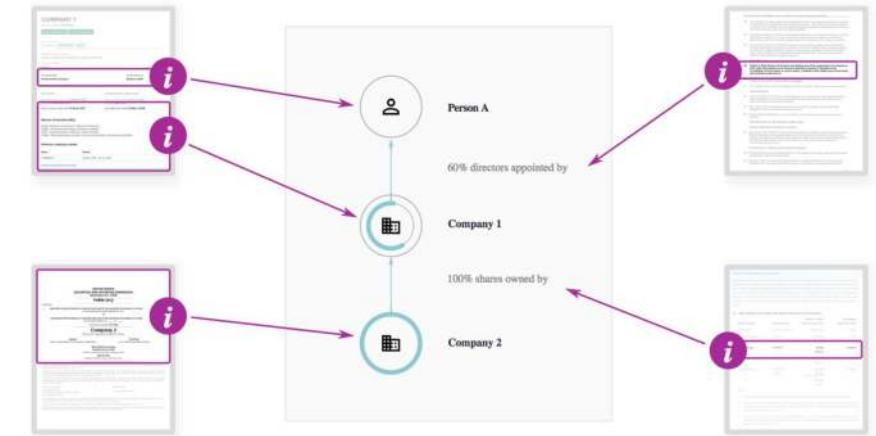
# (7) Source documents

**Will you store, verify and provide access to, source documents?**

How can we trust the information that is held in beneficial ownership registers?

How can we use beneficial ownership registers as a tool for accountability?

Best practice: linking to original source documents

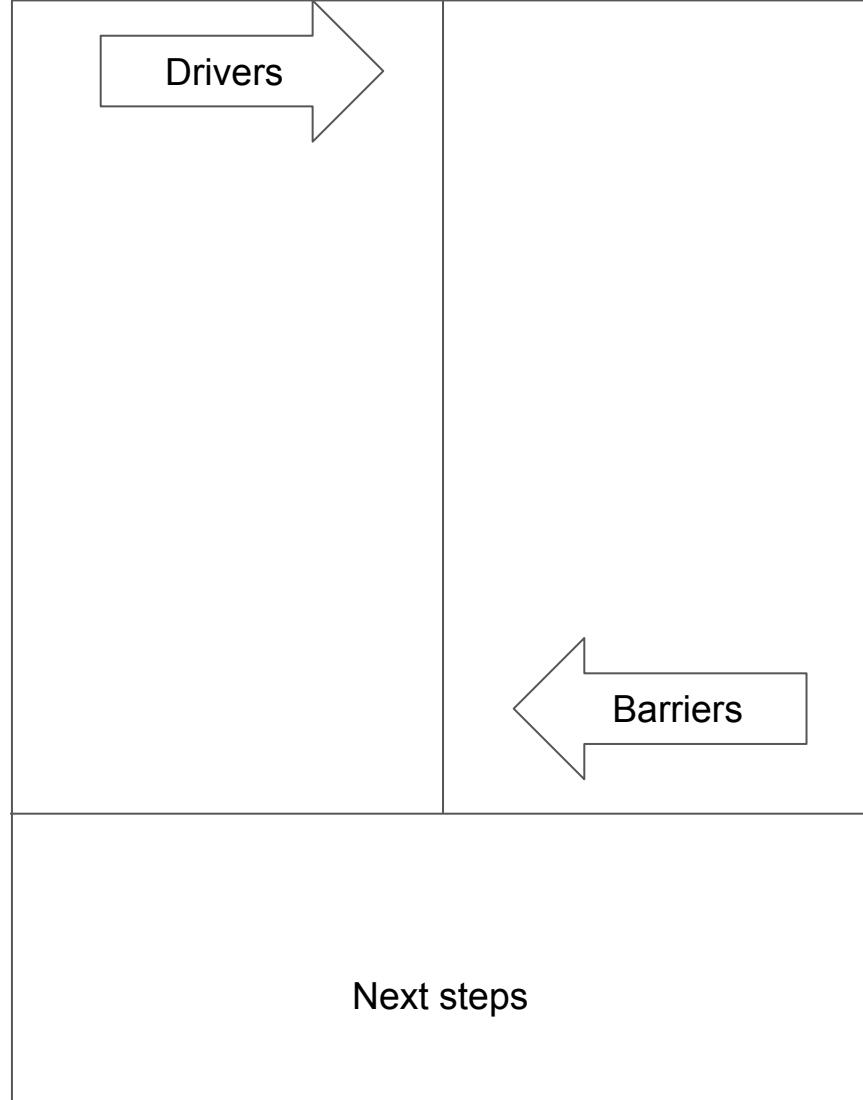


A dark wooden table with various bowls of ingredients like flour, sugar, and shredded cheese.

Do you have the  
ingredients you need?

## Seven key decisions

1. Types of interest
2. Thresholds
3. Ultimate ownership vs. capturing the chain
4. Missing data & exclusions
5. Identifiers
6. Historical data
7. Source documents





The Global Beneficial Ownership Register

# End of session

# OPEN OWNERSHIP

The Global Beneficial Ownership Register

## Advanced modelling of beneficial ownership data

Presented by Kadie Armstrong and Jack Lord

[www.openownership.org](http://www.openownership.org)



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# OPEN OWNERSHIP

The Global Beneficial Ownership Register



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# BODS: advanced concepts

- Trusts
- Sources
- Annotations
- Missing data
- Politically-exposed persons
- Replacing statements
- Arrangements
- Indirect and direct ownership

# BODS: advanced concepts

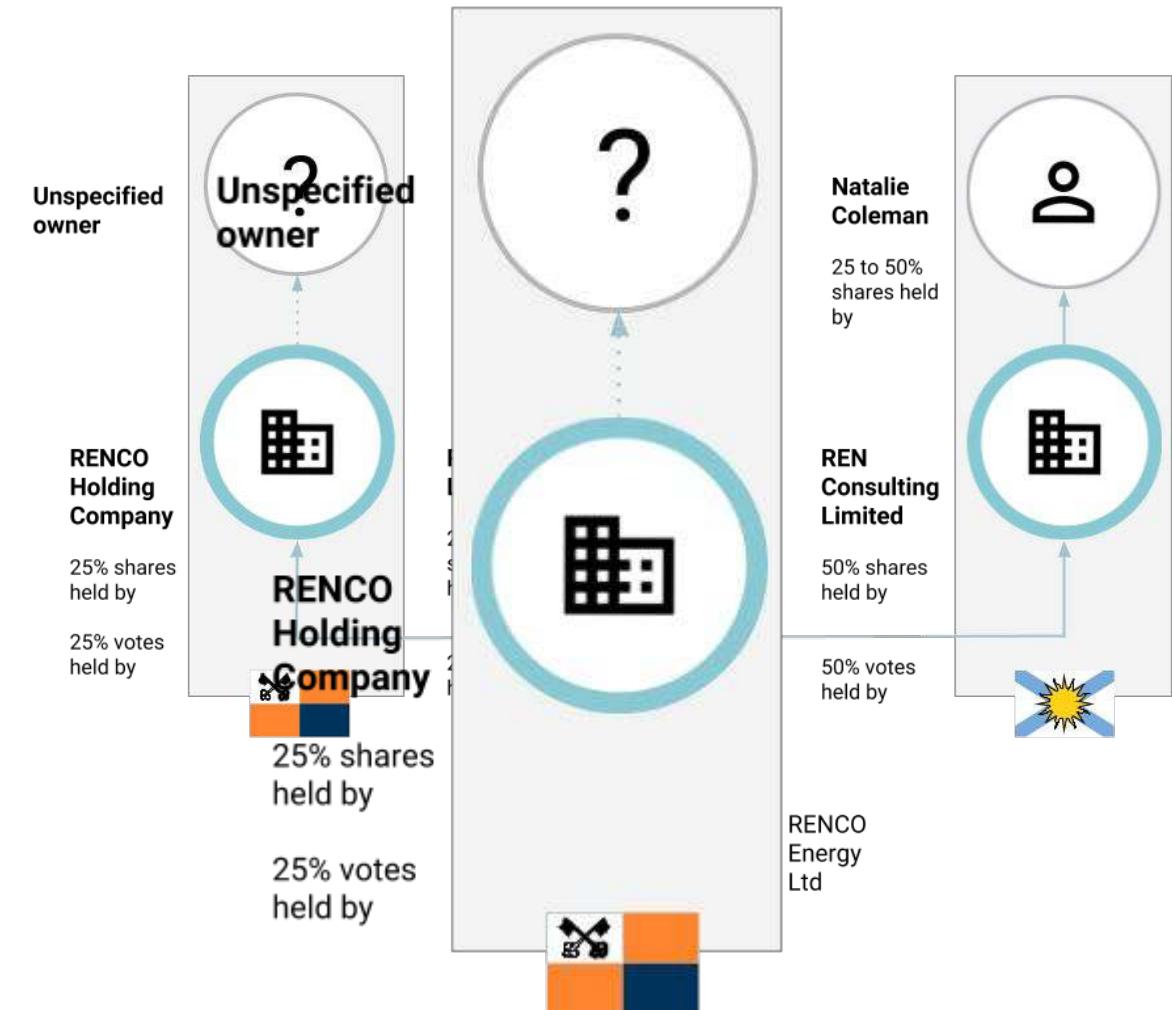
- Trusts
- Sources
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**Trusts** are complex legal instruments. In BODS, we model trusts as an entity with the arrangement type.

Trusts have particular kinds of **ownership or control** that can be expressed in an interest statement. These reflect international reporting requirements.

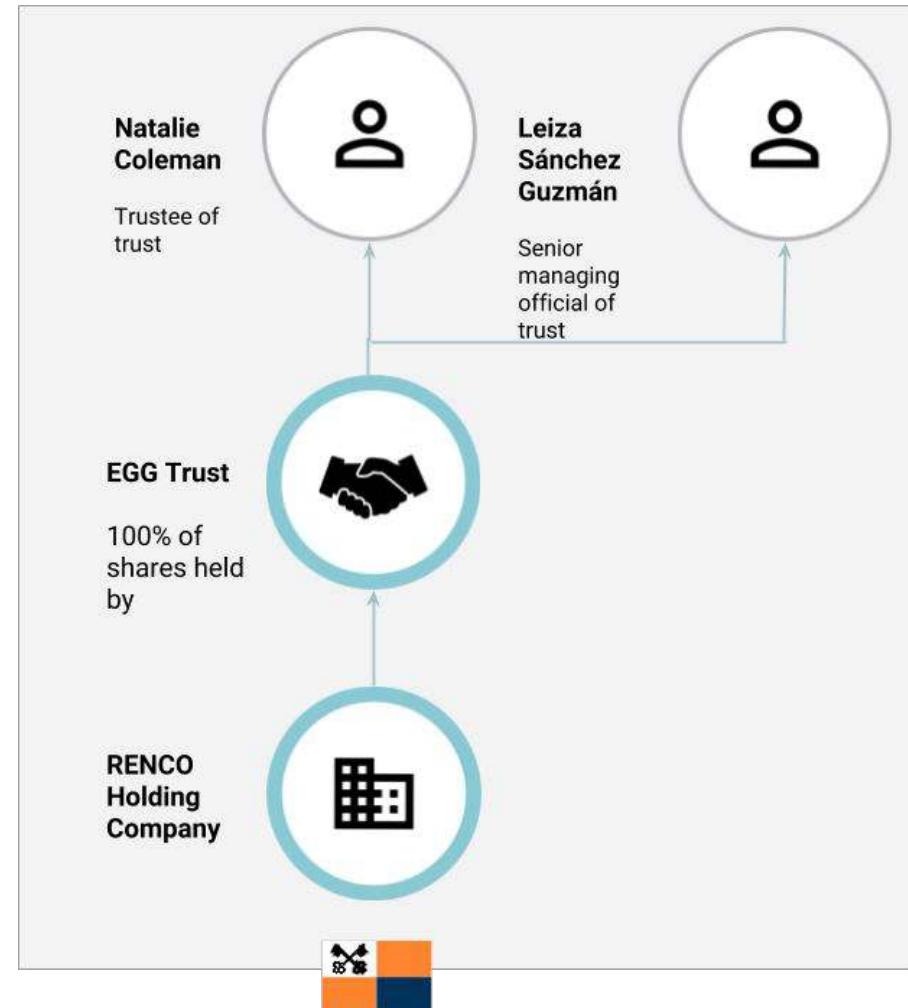
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# BODS: advanced concepts

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# BODS: advanced concepts

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## Quick quiz

Can we re-use the person statement that we already have about Natalie Coleman?

- (A) Yes
- (B) No

# BODS: advanced concepts

- Trusts
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## Quick quiz

Can we re-use the person statement that we already have about Natalie Coleman?

- (A) Yes
- (B) No

Statements represent what is asserted about a person at a particular point in time, from a particular source.

We can't assume that the same information about Natalie Coleman will be asserted in each statement.

Statements MUST be immutable.

We need a new statement.

# BODS: advanced concepts

Name: Natalie Coleman

Nationality: United Kingdom

Name: Leiza Sánchez Guzmán

Nationality: Lock Islands  
(Code: XL)

Name: EGG Trust

Identifier scheme:  
XE-LO-TA

Identifier: 4599722

Name: RENCO Holding Company

Identifier scheme:  
XE-LO-COH

Identifier: 28367095



# BODS: advanced concepts

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Knowing where information came from is crucial to make information in registers credible, for due-diligence use-cases and to hold submitters of information accountable.

To facilitate this in BODS, the standard allows **sources** created by **agents** to be attached to statements.

# BODS: advanced concepts

- Trusts
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Source	[...] Source type	'selfDeclaration', 'officialRegister', 'thirdParty', 'primaryResearch', 'verified'
Description		
Source URL		
Retrieved at		

Any statement can have a source:

- Source type gives us clues on reliability
- Can have a source URL for linking to an external page

# BODS: advanced concepts

- Trusts
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Sources are asserted by 'agents': an individual, organisation or other responsible agent making, or supporting, a given statement.

If an entity or person is making statements about itself then the name should be as it appears in the enclosing statements.

# BODS: advanced concepts

## Source

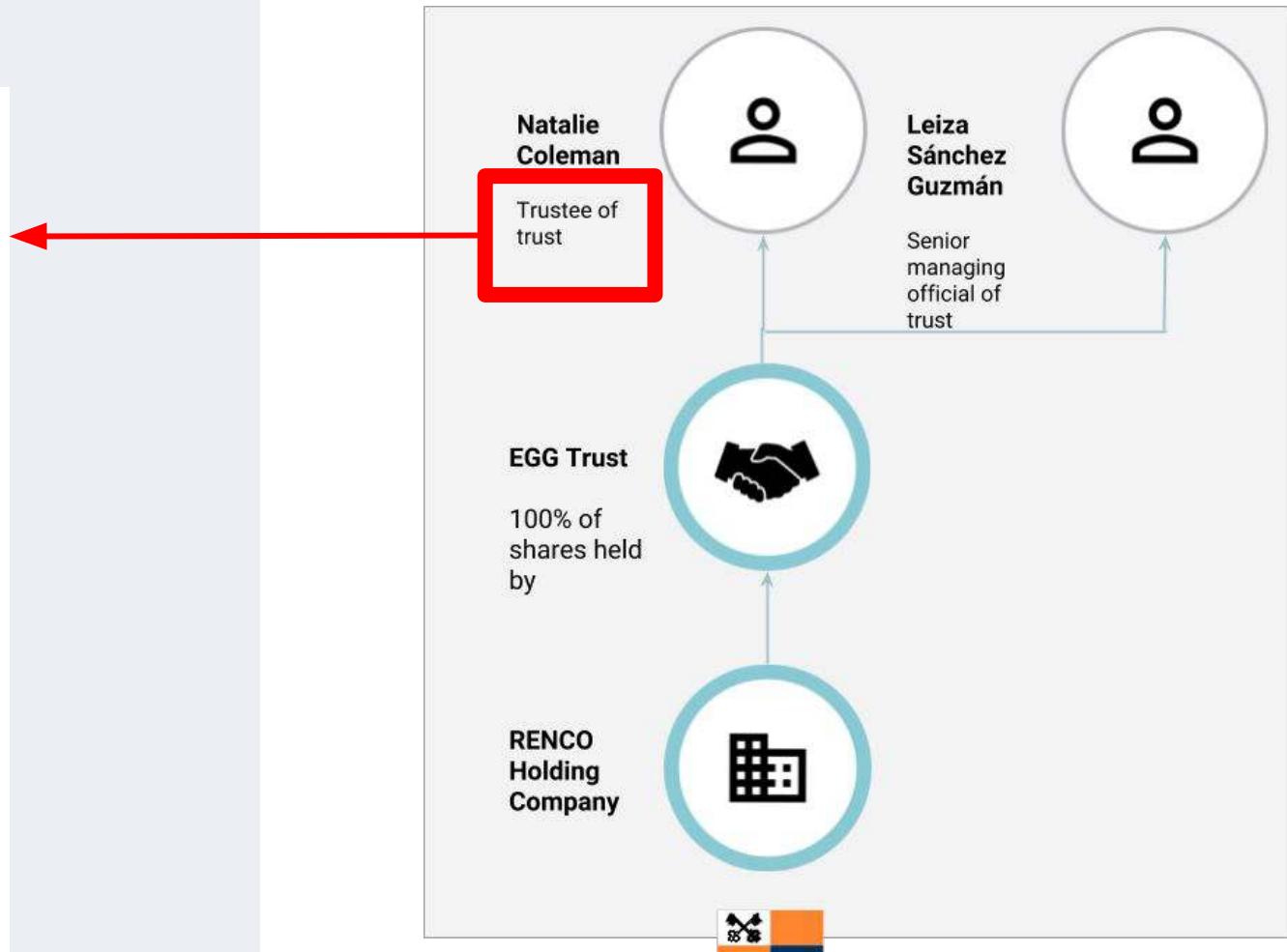
Description: Lock Islands Beneficial Ownership Register

Source URL: [www.companieshouse.lock/](http://www.companieshouse.lock/) + statementID for ownership or control statement

Retrieved At: Today's date

## Asserted By

Name: Leiza Sánchez Guzmán



# BODS: advanced concepts

- Trusts
- Sources
- **Annotations**
- Missing data
- Politically-exposed persons
- Replacing statements
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- Indirect and direct ownership

## Annotations

The purpose of annotations is to provide **additional information** for beneficial ownership data, to provide **context** or **linked materials**, or to provide detail on how data has been **transformed**.

# BODS: advanced concepts

## [...] Annotations

### Motivations

"commenting"

"correcting"

"identifying"

"linking"

"transformation"

### Description

A free-text description to annotate this statement or field.

# BODS: advanced concepts

 Person statement

<b>ID</b>	26c76017-1a13-4f12-8d74-64ef1e104cd2
<b>Statement type</b>	personStatement
<b>Statement date</b>	30 / 09 / 2016
<b>Person type</b>	knownPerson
<b>Missing information reason(s)</b>	

**Names**

**Name 1**

<b>Type</b>	fullName
<b>Full name</b>	E Gomez Garrido

E. Gómez Garrido

# BODS: advanced concepts

The screenshot shows a 'Person statement' form. At the top left is a circular icon with a person icon. The title 'Person statement' is in bold teal text. Below it are several input fields:

- ID**: 26c76017-1a13-4f12-8d74-64ef1e104cd2
- Statement type**: personStatement
- Statement date**: 30 / 09 / 2016
- Person type**: knownPerson
- Missing information reason(s)**: (empty field)

Below these is a section titled 'Names' containing:

- Name 1**:
  - Type**: fullName
  - Full name**: E Gomez Garrido

Annotations can apply to either:

- a **whole statement**
- any **path** within a statement (or a part of a statement)

# BODS: advanced concepts

Person statement

ID: 26c76017-1a13-4f12-8d74-64ef1e104cd2

Statement type: personStatement

Statement date: 30/09/2016

Person type: knownPerson

Missing information reason(s):

Names

Name 1

Type: fullName

Full name: E Gomez Garrido

Annotation 1 [type: type]

Statement Fragment Pointer /

Creation Date: 05/07/2018

Created By

Name: Jack Lord

URI:

Motivation: commenting

Description: This is the Minister of Mines and Energy in Diamondia

Transformed content:

URL:

# BODS: advanced concepts

 Person statement

ID	26c76017-1a13-4f12-8d74-64ef1e104cd2
Statement type	personStatement
Statement date	30 / 09 / 2016
Person type	knownPerson
Missing information reason(s)	

**Names**

Name 1	Type	fullName
	Full name	E Gomez Garrido

**Statement Fragment Pointer** /names/0 → /names/0/

**Creation Date** 05 / 07 / 2018

**Created By**

<b>Name</b>	Jack Lord
<b>URI</b>	

**Motivation** commenting

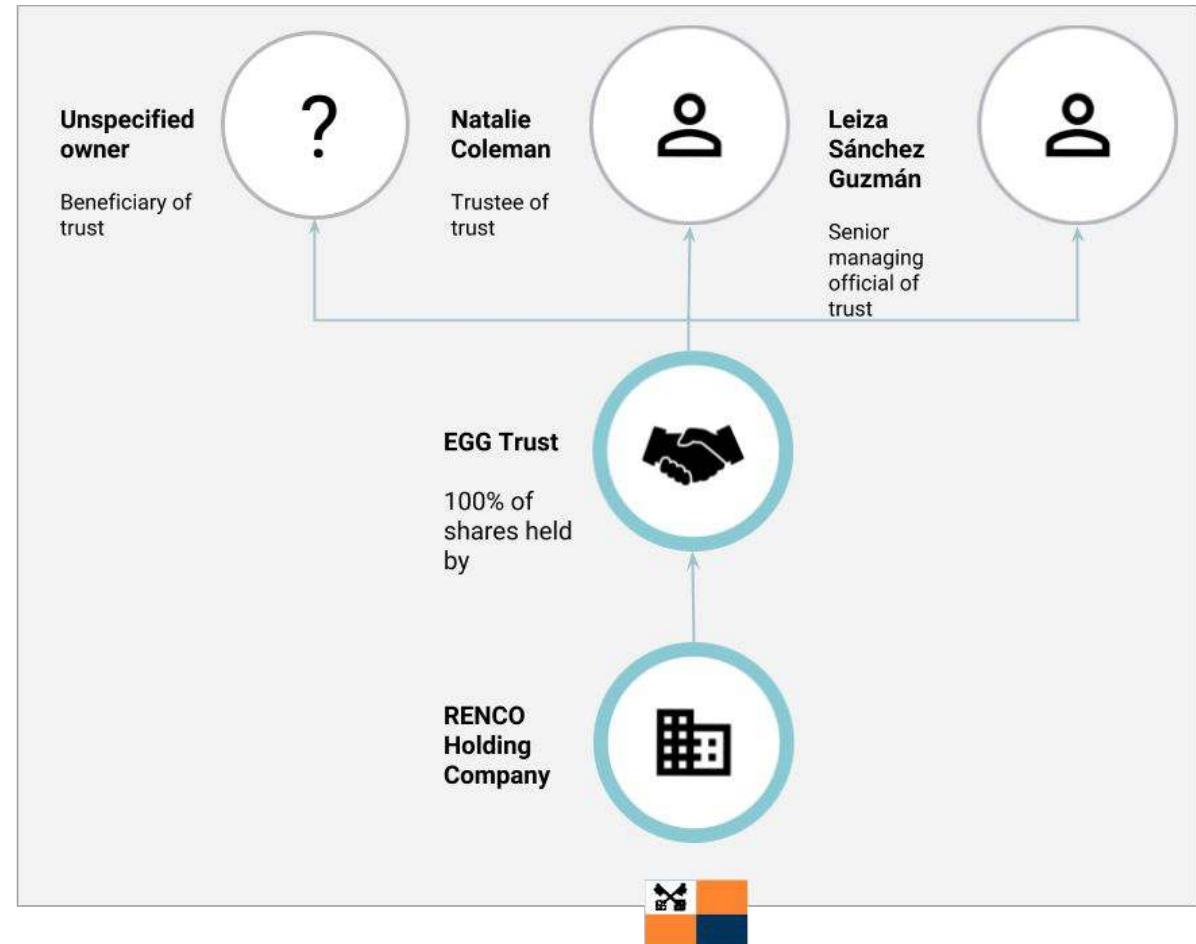
**Description** In other documents, E. Gomez Garrido has been referred to as Ernesto Gomez Garrido.

**Transformed content**

**URL**

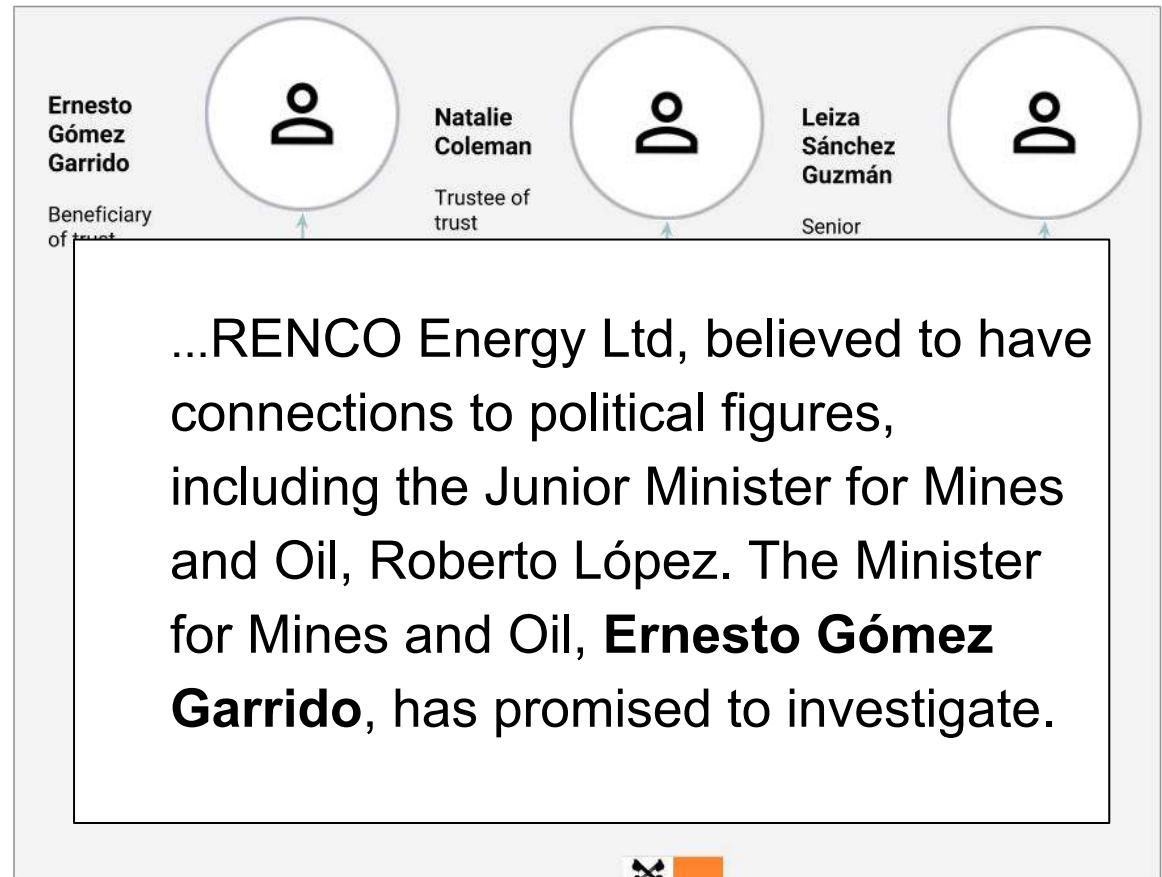
# BODS: advanced concepts

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# BODS: advanced concepts

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# BODS: advanced concepts

## Politically Exposed Person Status

### PEP Status 1

**Reason**

Prime Minister of Solaria

Prime Minister of Solaria

### Jurisdiction

**Name**

Rupert Smith

**Country code**

xs

**Start date**

2014-04-01

**End date**

# BODS: advanced concepts

- Trusts
- Sources
- Annotations
- Missing data
- Politically-exposed persons
- Replacing statements
- Arrangements
- Indirect and direct ownership



# BODS: advanced concepts

- Trusts
- Sources
- Annotations
- Missing data
- **Politically-exposed persons**
- Replacing statements
- Arrangements
- Indirect and direct ownership

# BODS: advanced concepts

Name: Ernesto Gomez Garrido

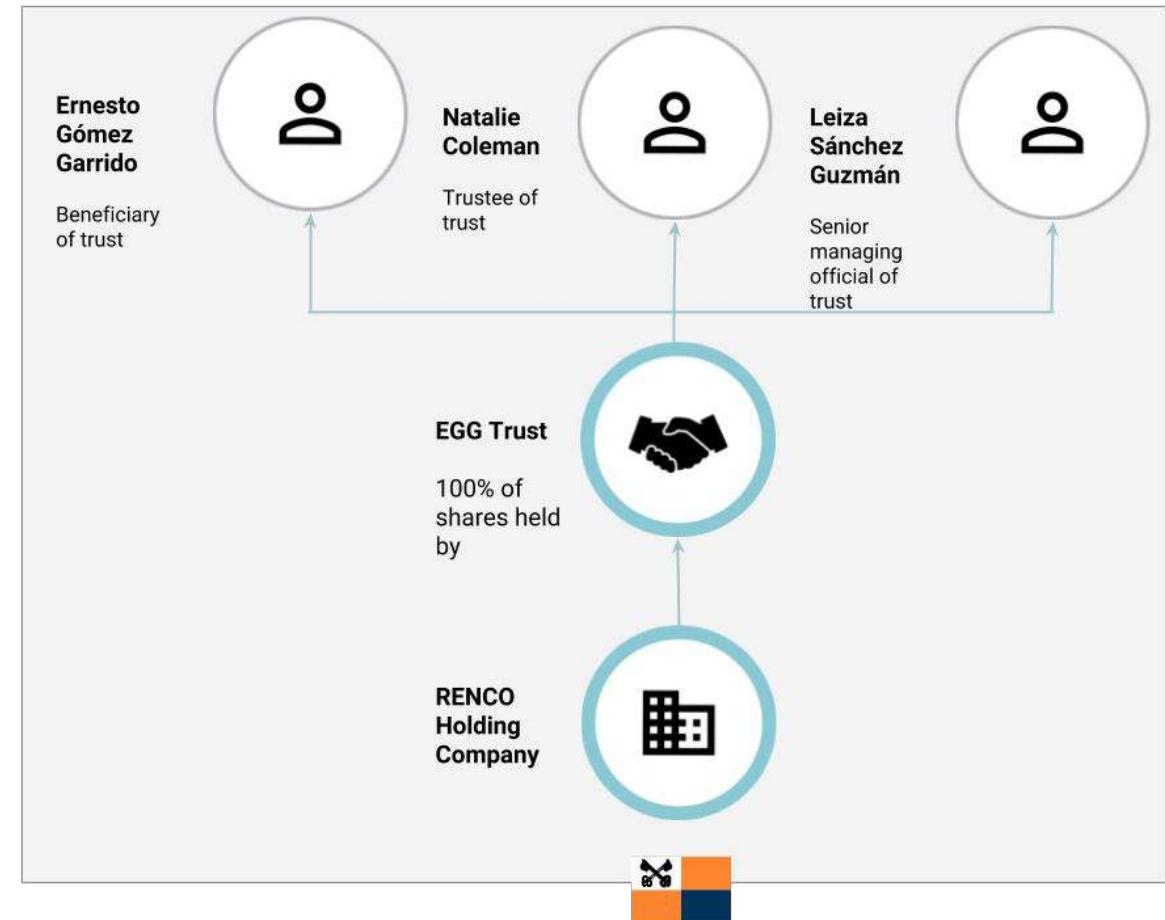
Nationality: XD

PEP Status:

From: 2014-03-08

To: 2018-07-17

Reason: ?



# BODS: advanced concepts

- Trusts
- Sources
- Annotations
- Missing data
- Politically-exposed persons
- **Replacing statements**
- Arrangements
- Indirect and direct ownership

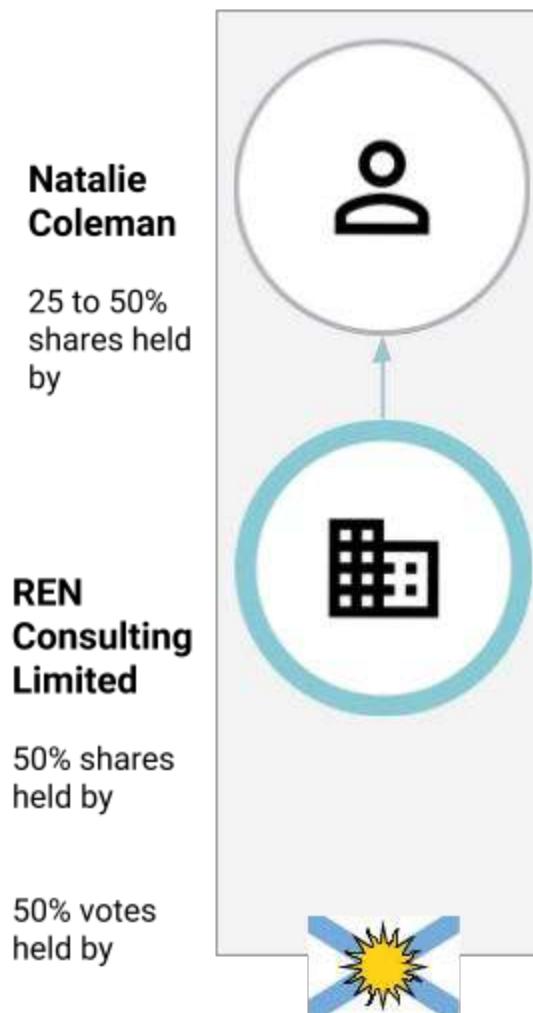
**Statements are immutable...**

....so we replace statements rather than update.

The new statement should leave a trail back to the old statement(s) so that changes over time can be traced.

# BODS: advanced concepts

- Trusts
- Sources
- Annotations
- Missing data
- Politically-exposed persons
- Replacing statements
- **Arrangements**
- Indirect and direct ownership





Joint shareholding is a kind of arrangement.

The *arrangement* is the interested party to REN Consulting Limited and the joint shareholders are interested parties in the arrangement.

In this example, based on English law, both parties have a 100% interest in the arrangement because they are considered to have an equal and undivided right to the interest.

# BODS: advanced concepts

- Trusts
- Sources
- Annotations
- Missing data
- Politically-exposed persons
- Replacing statements
- Arrangements
- Indirect and direct ownership

Discussion question:

What is Ernesto Gomez Garrido's indirect interest in REN Energy Ltd?



The Global Beneficial Ownership Register

# Congratulations!

You are now advanced

[www.openownership.org](http://www.openownership.org)

# OPEN OWNERSHIP

The Global Beneficial Ownership Register

## Next steps, needs and support

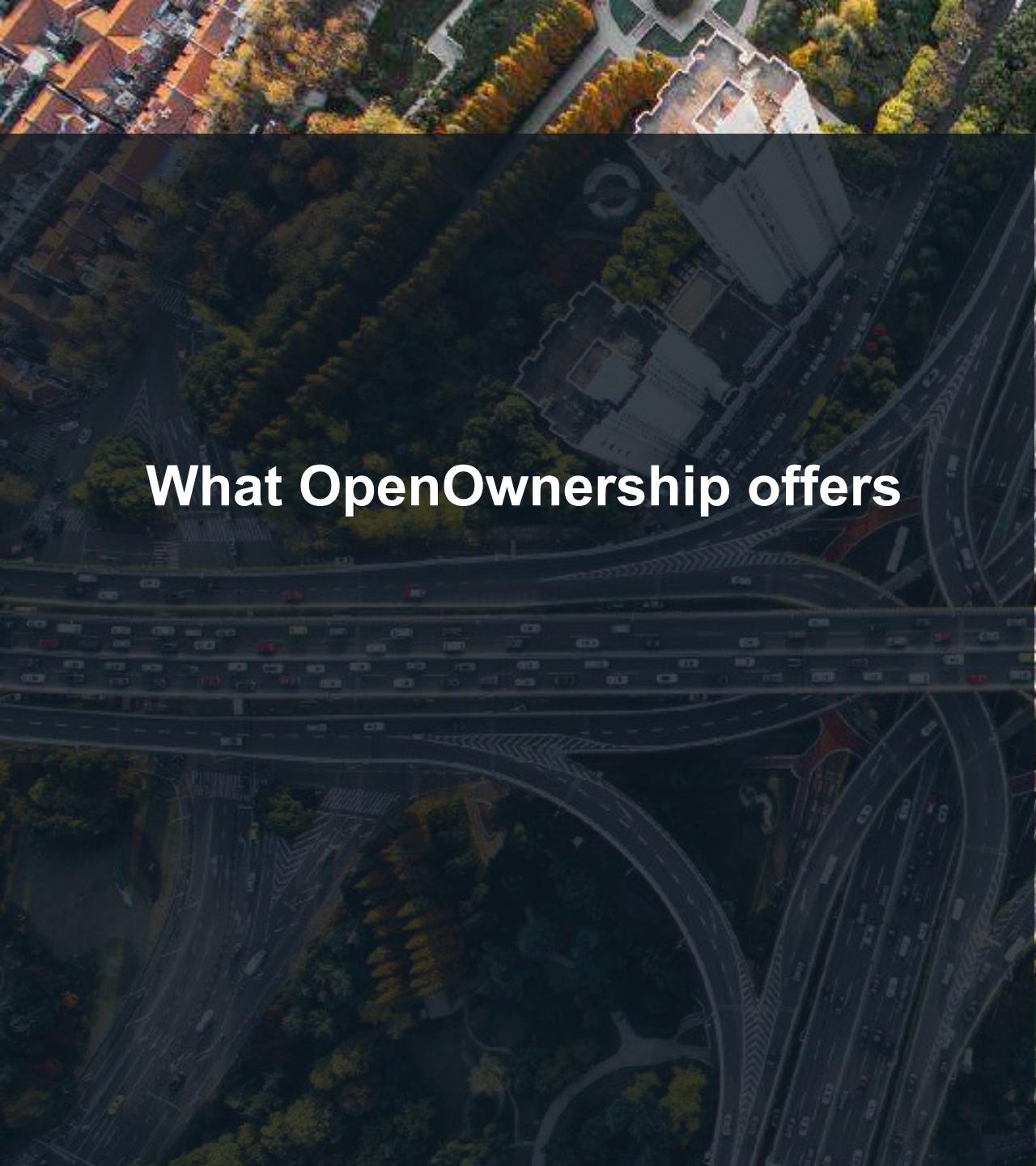
Presented by Kadie Armstrong

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# What OpenOwnership offers



- **Building a stable and trusted beneficial ownership data standard and user base.**
- The OpenOwnership pilot program
- 1-1 technical assistance
- Private sector engagement
- Sharing knowledge and best practice

The Beneficial Ownership Data Standard (the Standard) is being developed in collaboration users and experts in technical standard-setting.

It will enable the resulting beneficial ownership data to be interoperable, more easily reused, and higher quality. We are engaging with public and private sector publishers of beneficial ownership data to encourage uptake of the Standard.

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Our pilot program supports data publishers in national governments and multinational institutions to publish high quality, highly usable beneficial ownership data. We provide public entities that are publishing beneficial ownership data with bespoke technical assistance.

The lessons learned from these partnerships will also inform the development of implementation guidance, case studies, and best practice for future beneficial ownership initiatives.

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- **1-1 technical assistance**
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Whether this occurs within the pilot program or on a bespoke basis, we are committed to providing technical assistance to beneficial ownership data publishers in both the public and private sectors.

Through our helpdesk (available by contacting [support@openownership.org](mailto:support@openownership.org)) we can answer questions about technical implementation and provide a hub for sharing best practice and learnings from different implementations.

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We are encouraging corporations and financial institutions to use the OpenOwnership Register (and eventually our API) as part of their due diligence processes and to submit their ownership data to the Register.

We are currently seeking early adopters to work with so that we can build a strong use case to build momentum.

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- **Sharing knowledge and best practice**

We will continue to champion beneficial ownership transparency amongst all our key stakeholder groups.

To do this, we regularly hold workshops like this and other events to engage users and gather feedback. We also collate and share case studies of real world use cases and briefing papers through our the resources page on our website:

[openownership.org/resources](http://openownership.org/resources)

Beneficial Ownership Data Standard

# Working Group - overview

- The working group includes a **range of stakeholders** with an interest and expertise in data relating to corporate control or beneficial ownership,
- Committed to the use of such **data in the public interest**.
- Working group members **guide development of the standard**, ensuring that relevant requirements, user needs and technical considerations are taken into account.

## Private sector working group

Your feedback will help us provide true visibility on who you're doing business with

[Apply](#)

## Public sector working group

Tell us how we can streamline procurement due diligence, law enforcement, and tax investigations

[Apply](#)

## Civil society working group

What can we do to help you get your next big story from our data?

[Apply](#)

## Data standard working group

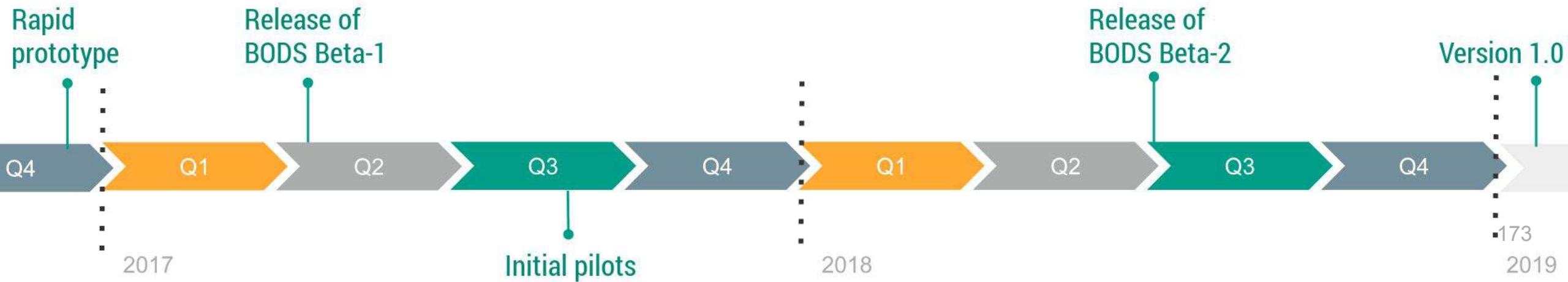
Help create the world's first beneficial ownership data standard

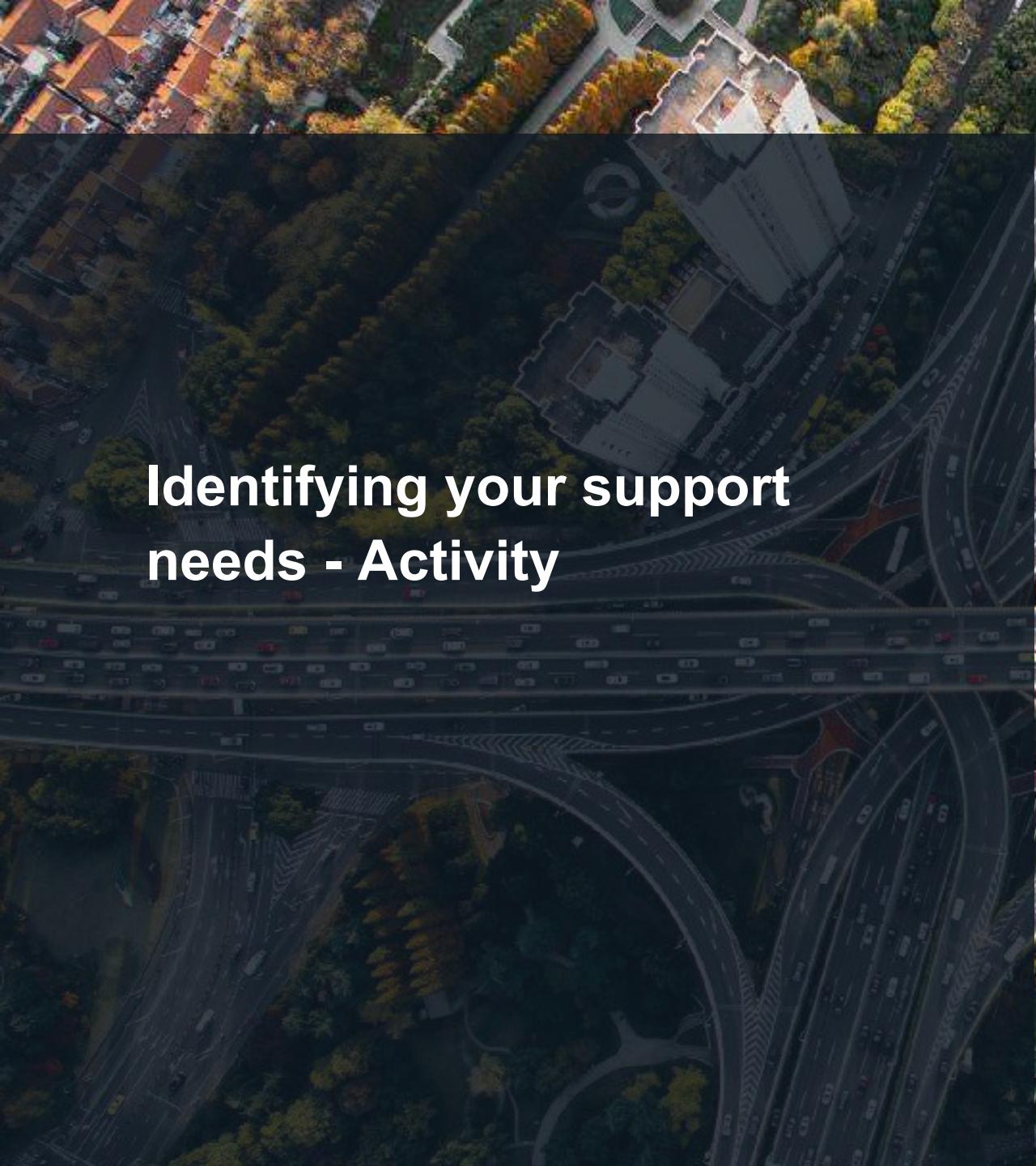
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Beneficial Ownership Data Standard

# Working Group activities

- Collecting **complex examples** of ownership structures. (Send to [support@openownership.org](mailto:support@openownership.org) or this [issue](#))
- Reviewing and feeding back on **documentation**.
- Using the **new release of the Standard**.
- Contributing **case studies**.





## Identifying your support needs - Activity



- Policy decisions ■ Implementation
- decisions ■ Pilots ■ Collection
- systems ■ Data collected ■ Data
- management systems ■ Data quality
- Data processing

## OPEN OWNERSHIP

The Global Beneficial Ownership Register



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### What are our needs?

- Policy decisions ■ Implementation decisions ■ Pilots ■
- Collection systems ■ Data collected ■ Data management systems
- Data quality ■ Data processing

Next steps

We need...

# Contact details

**Helpdesk contact email:** support@openownership.org

**Zosia**, OpenOwnership: zosia@openownership.org

**Jack**, Open Data Services Cooperative: jack.lord@opendataservices.coop

**Kadie**, Open Data Services Cooperative: kadie.armstrong@opendataservices.coop

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