

Consideration of issues raised by optical bodies in relation to revisions to the Protocol on the Handling of Criminal Convictions Disclosed by Registrants

Para 6 – Extending the period for an applicant to provide further information to 28 days could potentially lead to a long delay in the decision-making process. This could, in particular, cause problems for processing applications for retention, where the deadline for response may as a result fall after the retention deadline. If an applicant plans to be away around the time of submitting their application, it is good practice to provide a note to that effect with their application, and if possible alternative contact details for that period. We would prefer to retain a 14 day period for requiring information and amend the guidance notes to applicants making a declaration in respect of contact details as above.

Para 7 – Whilst in many cases decisions are notified within a shorter timeframe than ten working days, the proposed reduction to five working days in all cases would impact strongly on those cases requiring serious consideration. It is important to ensure that decisions are sound and fully explained at this stage in order to avoid problems at the Registration Appeals stage. We believe that if the applicant is honest and transparent with us in making the application they should not be under extreme stress during the process.