MP4 - Access

This process is intended to help assist in determining whether it is reasonable to consider that a Third Party may gain relevant access to children or the vulnerable

NOT RELEVANT No Audit Trail

Please see local guidance re documenting as NR on AT2



No Audit Trail Required

Does the information fall into any of the categories referred to at Note 1?

Do you believe there is a <u>reasonable reason</u> to believe that the Third Party may gain relevant access to children or the vulnerable through the applicant?

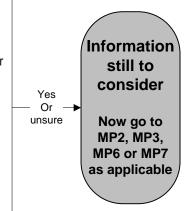
Here are some example of the types of considerations that may assist you in answering the above question: (Please note, this is NOT an Exhaustive or Conclusive list)

- Does the information suggest that the Third Party may be related to the Applicant?
- Is there anything to suggest that the Third Party resides at or has regular access to the applicant's address?
- Was the application referred to you as a Home Based Occupation?
- Does your information suggest that the applicant has, in the past, worked in a role for which you would consider a Third Party risk (i.e. applying for Children's workforce and has worked as a Teacher)?
- Do the Registered Body or Employer details suggest employment which would make you consider Third Party risk?
- Is it reasonable to consider that the Third Party may have or gain relevant access to the vulnerable through the applicant through their work or regulated activity?

N.B. You may need to search additional local information systems and PNC, using the Third Party nominal details, to enable you to answer this question. Representations may be required.

You need to establish whether you believe there exists a reasonable connection between the Third Party and the applicant; one that may provide the Third Party with access to the vulnerable via the applicant's role.

You need to establish whether the Third Party has information that demonstrates that they may pose a significant risk of harm to the vulnerable, through the applicant



Note 1:

A) If the Applicant or Third Party referred to in the information is **only** mentioned as either a **victim**, as an attending/investigating **police officer**, as a **witness** or as the **source** of the information, their involvement is Not Relevant and No Audit Trail is required.

B) If the information is solely police intelligence which t does not result as 'Relevant For Further Consideration' on the MP3 or MP6 then it is Not Relevant and No Audit Trail is required.

C) If the individual has been recorded as a Missing Person, refer to Note 2

Note 2:

If an individual has been recorded as a Missing Person who is alleged to have been involved in some type of crime and/or monitored or detained under the Mental Health Act, the information should be considered, assessed and appropriately categorised (using the MP3/MP6) and recorded on the AT2 if it results as 'Relevant For Further Consideration'.

MP4 Guidance notes for DO's.

When considering a Third Party, you may approach the question of potential risk (to the vulnerable group in question) from one of two different ways:

- Does the relationship between the applicant and the Third Party provide them with relevant access to the vulnerable?
- Does the Third Party have intelligence or a conviction history that demonstrates that they may pose a significant risk to the vulnerable?

Common sense holds that a Third Party that has no relevant access to the vulnerable cannot be relevant to the application and, therefore, cannot pose a risk.

Conversely, where there exists no information to suggest that the Third Party may pose a risk to the vulnerable, the access that they may have is immaterial (and if you have not yet established their access, you would have no need to do so).

Therefore, you may begin Third Party considerations from either angle:

- relationship/link between the applicant and the Third Party (relevant access to the vulnerable) or
- assessment of the intelligence of conviction information that you have about the Third Party

If you cannot establish a relevant connection between the Third Party and the applicant, can they pose a risk at all? Do you need to assess further?

If there is nothing to indicate that the Third Party has relevant access to the vulnerable, can they pose a risk at all? Do you need to assess further?

If there is no intelligence or conviction information that indicates that they pose a risk, do you need to establish whether they may have relevant access?

If the application is for a Home Based Occupation, it should have been referred to you as such. However, there may be roles, within any particular workforce/sector, for which you still would consider a Third Party as a potential risk. Information that you hold, in the records of your force and within the DBS application details themselves, may help determine whether it is reasonable for you to consider disclosure of Third Party information.