

Northern Ireland Environment Agency

# Guidance on the Assessment of Relevant Convictions

**Refusal and Revocation**

## Guidance on the Assessment of Relevant Convictions Refusal and Revocation

**Purpose:** To give effect to the Policy on Relevant Convictions, which took effect on 1st January 2008, for the assessment of relevant convictions in waste management regulatory regimes.

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**Scope:** This guidance applies to the assessment of relevant convictions and the resultant consideration for acceptance or refusal of an application for a

- PPC permit (for specified waste management activities),
- waste management licence or
- registration or renewal of registration as a carrier or broker of controlled waste.

It also applies to the assessment of convictions when a holder of such an authorisation is convicted of a relevant offence. The application of the relevant convictions test to waste management regulatory regimes will be undertaken in accordance with this guidance and policy.

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**Related Documents:** Policy on Relevant Convictions

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## 1.0 INTRODUCTION

1.1 This guidance applies to the assessment of relevant convictions and the resultant consideration for acceptance or refusal of an application for

- a new PPC permit or transfer of a Permit, for a specified waste management activity
- a new Waste Management Licence or transfer of a licence
- registration (or renewal of registration) as a carrier or broker of waste,
- and the revocation of an existing permit, licence or registration on subsequent conviction of the holder.

In this document, permits, licences and registrations are referred to as 'authorisations' and 'holder' should be construed accordingly.

1.2 Applicants are required to disclose any relevant convictions against themselves or other relevant persons. The application may be refused if there are such convictions. Once issued, the Department has the power to revoke the authorisation if the holder is convicted of a relevant offence. The relevant offences for each regime are set out in Annex 1.

1.3 It should be noted that one relevant conviction against a person could be sufficient to prevent them from obtaining any authorisation issued by the Department and could result in revocation of any authorisation they hold.

1.4 The convictions assessment process involves an initial scrutiny of the applicant's convictions history against defined criteria, to determine whether there is a cause for concern. Those applications causing no concern can proceed without delay. Those causing muted concern can proceed but the applicant will be warned that future convictions will be regarded most seriously. Those applications causing serious concern will be subjected to more detailed scrutiny.

1.5 If a person who holds an authorisation is subsequently convicted of a relevant offence they will be regarded with serious concern and subjected to detailed scrutiny.

1.6 This process should be used:

- on application for a waste authorisation;
- where applicable, on transfer or renewal of a waste authorisation,
- on conviction of a holder of a waste authorisation because of enforcement by the Department, and
- on the Department learning of the conviction of a holder of a waste authorisation because of action by some other regulator (e.g. local authority, Customs & Excise).

## 2.0 OBTAINING INFORMATION FOR APPLICATIONS:

- 2.1 A relevant person is prescribed in legislation. A relevant person's conviction can affect the Fit and Proper Person (FAPP) status of the applicant or the authorisation holder.
- 2.2 The Department will consider the convictions of relevant persons on applications, transfers, renewals and existing authorisation holders.
- 2.3 Applicants for a new waste authorisation or transfer of a waste authorisation should provide details of convictions against relevant persons.
- 2.4 Convictions of a waste authorisation(s) holder will be relevant convictions for all the waste authorisations held by that holder and for other waste authorisation(s) for which the holder is a relevant person.
- 2.5 Convictions of a relevant person will be relevant convictions for all waste authorisations for which that person is a relevant person.
- 2.6 Persons considered relevant person(s) for waste authorisation applicants or holders are indicated below

**Table 1**

<b>Type of applicant</b>	<b>Relevant person</b>
<b>Companies (and other Bodies Corporate).</b>	<ul style="list-style-type: none"> <li>- The company.</li> <li>- Employees convicted in the course of their employment.</li> <li>- The officers of the company (director, manager, secretary).</li> </ul>
<b>Partners within a partnership</b>	<ul style="list-style-type: none"> <li>- The individual partners in the partnership.</li> <li>- Employees convicted in the course of their employment.</li> <li>- Business partners of the applicant where the offence was committed in the course of their business.</li> </ul>
<b>Individuals</b>	<ul style="list-style-type: none"> <li>- The individual</li> <li>- Employees convicted in the course of their employment.</li> </ul>

- 2.7 Additionally where an applicant has been convicted after 1st January 2008 (the date of implementation of the Relevant Convictions Policy), a Post-Conviction Plan (see section 5 of this guidance) must be produced in relation to that offence and it should accompany the application.
- 2.8 On receipt of an application, the licensing/permitting officer dealing with it should consult with the Environmental Crime Unit to establish whether there are any completed or ongoing investigations which might be relevant to the applicant.
- 2.9 It is advisable that relevant databases are checked for accuracy of conviction information. This is not a requirement for every application but should be carried out frequently for registration of carriers and brokers applications or where the perceived risk of inaccuracies is high.
- 2.10 If additional relevant convictions are found in these or other routine database searches the applicant should be contacted using the format of the letter for “Declaring undeclared convictions and requesting further information”.
- 2.11 If the applicant does not respond or is unable to demonstrate no connection with the undeclared conviction, details of the case are to be obtained from the prosecuting office or the relevant court as detailed in the letter for “Requesting Additional Information from the Relevant Court”.
- 2.12 On obtaining the information the likelihood of the conviction being connected with the applicant is to be assessed to determine whether it should form part of the Department’s considerations. (Details in Annex 2). Once full details of an applicant’s conviction history is known, the significance of those relevant convictions can be assessed in accordance with section 4 of this guidance.

### 3.0 SPENT CONVICTIONS

- 3.1 The Rehabilitation of Offenders (Northern Ireland) Order 1978 allows for a convicted individual to become a 'rehabilitated person' at the end of the 'rehabilitation period' provided they meet certain criteria. At the end of this period the conviction is treated as spent. Spent convictions are not disclosable on any application form.
- 3.2 The Order does not apply to companies, therefore conviction of a company must be declared on an application form. However, for the purpose of relevant convictions, the Department will consider the convictions as being spent in the same way as convictions against individuals when assessing their significance in accordance with section 4 of this guidance.
- 3.3 Table 2 below gives the rehabilitation periods commonly applicable to relevant convictions. This is only a summary and it should be noted that different periods apply to juveniles.

Table 2

Sentence	Rehabilitation period (from date of conviction)
A sentence of prison or youth custody of more than 6 months and not exceeding 2 ½ years.	10 years
A sentence of prison or youth custody of 6 months or less.	7 years
Fine	5 years
Community Punishment Order	5 years
Community Rehabilitation Order	5 years
Conditional discharge	1 year, or until the order expires (whichever is longer)
Bind over	1 year, or until the order expires (whichever is longer)
Absolute discharge	6 months

## 4.0 ASSESSMENT PROCESS FOR APPLICATIONS

4.1 Once all the information on relevant convictions for an applicant has been received, the convictions must undergo initial scrutiny by the licensing/permitting officer in order to determine their significance and assign them to one of three categories using Table 3 below:

**Table 3**

<b>Category</b>	<b>Criteria</b>
<b>No concern</b>	No relevant convictions, or only those relevant convictions that are spent (or would have been had they been sustained by an individual person), are declared in an application.
<b>Muted concern</b>	<p>Relevant convictions are declared in the application, but:</p> <ul style="list-style-type: none"> <li>- All convictions since 1st January 2008 have been addressed by a Post-conviction plan accepted by the Department,</li> <li>- All earlier convictions declared are addressed in 'Representations of fitness',</li> <li>- conviction did not result in imprisonment (including suspended sentences) or Community Punishment / Rehabilitation Orders for any relevant person,</li> <li>- conviction was not as a result of a proven act of recklessness or dishonesty by a relevant person, and</li> <li>- conviction was not as a result of attempted deception of the Department.</li> </ul>
<b>Serious concern</b>	<p>Circumstances not falling within the above categories, that is:</p> <ul style="list-style-type: none"> <li>- A conviction since 1st January 2008 has not been addressed by a Post-conviction plan, or the relevant authorisation has been revoked,</li> <li>- Earlier convictions are not addressed in 'Representations of fitness',</li> <li>- a relevant conviction has resulted in imprisonment (including suspended sentences) or Community Punishment / Rehabilitation Orders of a relevant person,</li> <li>- there is evidence that conviction was as a result of a proven act of recklessness or dishonesty by a relevant person,</li> <li>- there is evidence that a relevant conviction related to the attempted deception of the Department, or</li> <li>- there is evidence of conduct, unacceptable for the holder of an authorisation, even though it has not resulted in a relevant conviction (see Section 2.8)</li> </ul>

The assessment procedure is outlined in the flowchart in Figure 1 at the end of this section.

- 4.2 If, on initial scrutiny, an application falls into the category of muted concern, the licensing/permitting officer will continue to determine the application as usual but will warn the applicant that future subsequent convictions will be regarded most seriously. Any subsequent offences may require submission of a post-conviction plan and could result in the revocation of any waste authorisation held by that person. The “letter regarding muted concern” can be used or the text of this letter incorporated in a letter of rejection / acceptance of the application.
- 4.3 If, on initial scrutiny, an application falls into the category of serious concern, the licensing/permitting officer should pass details of the application and relevant convictions to the Relevant Convictions Assessment Panel (RCAP). The RCAP will be made up of 2 Grade 7 officers from the Land and Resource Management Unit who will seek advice from the Departmental Solicitor where appropriate. The RCAP will carry out an assessment of the significance of the offence, informed by a Post-Conviction Plan.

The RCAP will be more likely to direct that an application be refused or an authorisation revoked when:

- The applicant, or another relevant person, has been deprived of their liberty (imprisoned, etc) due to a relevant offence;
- A relevant offence(s) has had a serious impact upon the environment or health;
- An applicant is unable or unwilling to provide a post-conviction plan or representations of fitness;
- A repeating pattern of offending can be seen;
- An offence is due to in an intentional or deliberate act.

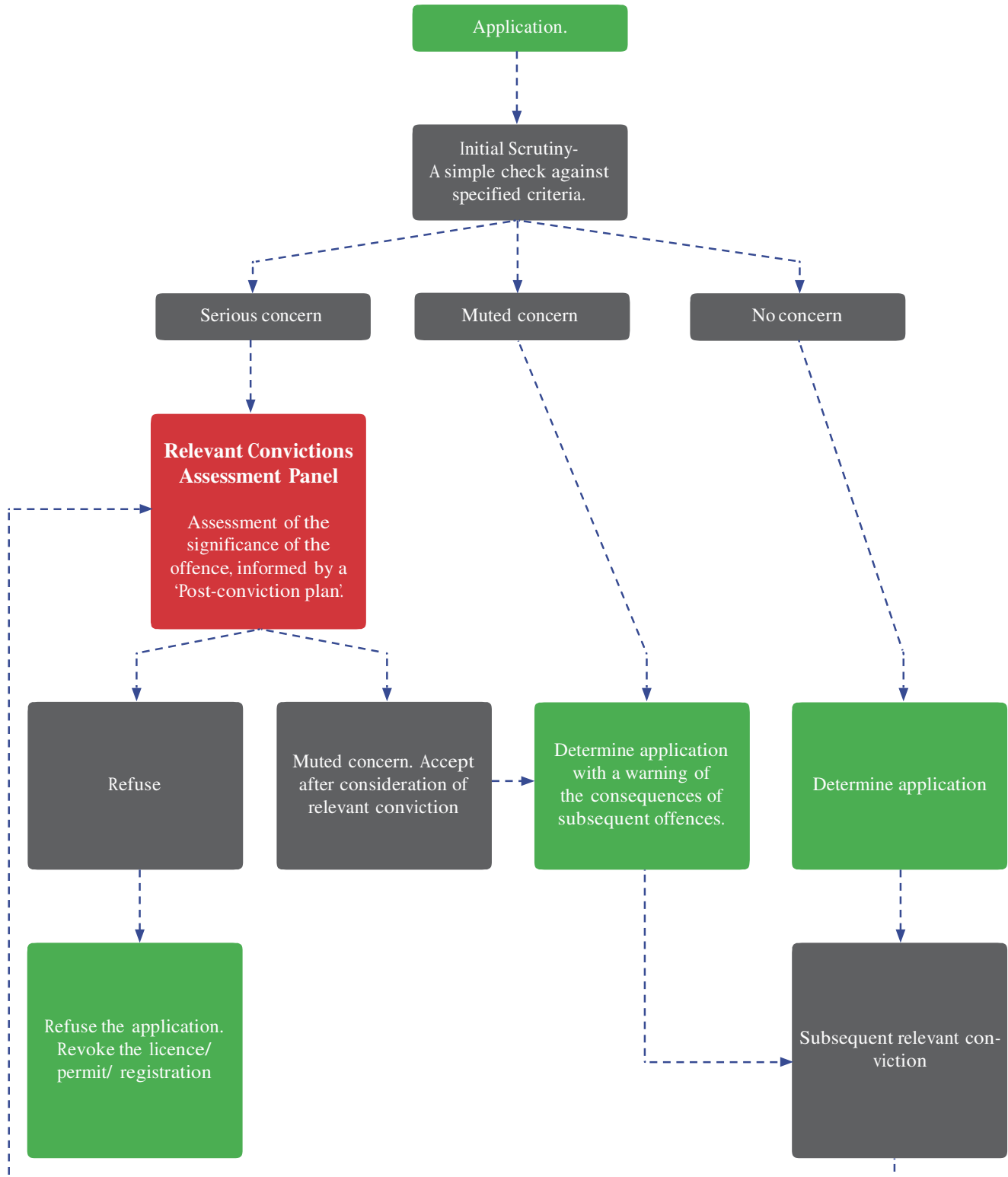
The RCAP will be less likely to direct that an application be refused or an authorisation revoked when:

- The relevant offence did not arise from waste management activities;
- Little risk of harm to the environment or health arose from the offence;
- The offence was a first offence, or an isolated conviction;
- It was an unintentional/accidental event that led to conviction.

If the RCAP decides that the relevant convictions do not merit that an application be refused or an authorisation revoked, they will advise the licensing/permitting officer to deal with the application as one giving rise to muted concern.

- 4.4 Once the RCAP have decided that an application is to be refused or an authorisation revoked, the licensing/permitting officer will be informed and a separate refusal or revocation notice should be issued for each type of application or authorisation.

Figure 1 – Relevant Convictions Assessment Process



## 5.0 POST-CONVICTION PLANS

- 5.1 The “Letter Requesting a Post-Conviction Plan” must be sent, by the licensing/permitting officer, to the applicant or licence holder in the serious concern category asking for a Post-Conviction Plan to be submitted. This means that the applicant is given the opportunity to demonstrate that their application should be granted or continue with an existing authorisation despite the relevant convictions.
- 5.2 The Post-Conviction Plan should contain the information specified in Table 4 below as far as is relevant in any particular case. Use of the form provided in “Letter Requesting a Post-Conviction Plan” should be encouraged but is not mandatory. Where a case is referred to the RCAP, an applicant may wish to supplement their written representations by meeting with members of the panel, if so, the applicant should indicate this at an early stage. The RCAP will normally permit personal representations in order that the fullest information is available to inform its decision.
- 5.3 Once a Post-Conviction Plan has been received it must be forwarded to the RCAP together with all other relevant information that has been gathered within 5 working days for consideration of refusal/revocation. The licensing/permitting officer must also provide a covering note indicating any views / preferences for action that they wish to communicate to the panel. A decision will be notified to the applicant or licence holder within 28 days of initial receipt by the EHS unless an extension of time has been agreed.
- 5.4 All information submitted in support of an application is to be placed on the public register, including the post-conviction plan, unless access to some or all of the information has to be restricted on the grounds of commercial confidentiality, national security or data protection.

**Table 4****Content of a Post conviction Plan**

<b>Scope of the Post-conviction plan</b>	<ul style="list-style-type: none"> <li>- List of the offences covered; when &amp; where committed, person convicted and business relationship to the licence holder/applicant, penalties imposed (i.e. fines / costs / compensation orders).</li> <li>- Authorisation(s) to which the Post-conviction plan relates</li> <li>- List of relevant persons to which the Post-conviction plan relates</li> </ul>
<b>Examination of the offences</b>	<ul style="list-style-type: none"> <li>- Summary of how the licence holder/applicant has investigated the cause, consequences and potential for repetition of the offences (at the offending location / site and at any other relevant location within the scope of the Post-conviction plan).</li> <li>- Circumstances which led to the offences</li> <li>- Effect of the offences on people and the environment</li> </ul>
<b>Authorisation(s) and activities to which the Post-conviction plan relates</b>	<ul style="list-style-type: none"> <li>- Activities permitted by each of the relevant Authorisations</li> <li>- Potential consequences on people or the environment should the offence(s) have occurred at each of these sites.</li> </ul>
<b>Likelihood of repetition of an offence / future compliance</b>	<ul style="list-style-type: none"> <li>- Potential for repetition of offences (prior to any remedial measures) within the scope of the Post-conviction plan.</li> <li>- Remedial measures taken to prevent recurrence, date of implementation. (e.g. management change, staff change, change in relationship with 3rd parties, provision for retraining, etc)</li> <li>- Details of the on-going audit of these remedial measures which ensures they are effective</li> <li>- Changes to other documentation / procedures to give effect to the compliance plan (e.g. quality assurance procedures, company standing instructions, training manuals)</li> <li>- Responsibilities at Board of Directors / Senior Management level for ensuring compliance.</li> </ul>
<b>Other Evidence</b>	<ul style="list-style-type: none"> <li>- Any further mitigation or evidence that the operator believes the Department should take into account in its determination, for example the significance of the offences compared to the number of registrations/licences and scale of business of the operator. If an applicant wishes to supplement their representations with a personal visit to the RCAP, this should be indicated at an early stage.</li> </ul>

## 6.0 NOTIFICATION OF DECISION

- 6.1 The RCAP may determine that the Post-Conviction Plan demonstrates that effective measures would be or have been taken to minimise the likelihood of re-offending and any subsequent effect on the environment or human health. In such circumstances the RCAP will advise the licensing/permitting officer who forwarded the Post-Conviction Plan that, in relation to the assessment of relevant convictions, the application should be accepted (with 'muted concern').
- 6.2 The RCAP may advise that the applicant has failed to demonstrate that they should be granted an authorisation. This is likely to occur where:
- the criminal record demonstrates repeated failures of infrastructure, procedures or other management controls,
  - the applicant has been reticent and the Post-conviction plan does not investigate and tackle those failures in a credible, comprehensive, systematic and auditable manner, or
  - the criminal record shows that the applicant has behaved recklessly or committed intentional or deliberate offences and the panel is unable to conclude that the post-conviction plan will prevent future reckless behaviour.

The RCAP will consider the potential consequences on the environment, people and public services when formulating their advice.

- 6.3 The RCAP will advise the licensing/permitting officer who forwarded the post-conviction plan of the decision within 20 working days of receipt of the Post-Conviction Plan. The licensing/permitting officer will then determine the application.
- 6.4 The RCAP may wish to seek further representations from the applicant and request that they attend a meeting to make such representations. This may lead to an agreed extension to the time period required for consideration.
- 6.5 An applicant has rights of appeal against any decision to refuse the application. The applicant should be advised within 5 days of the Department's decision, together with their rights of appeal.

## 7.0 SUBSEQUENT CONVICTION OF THE HOLDER OF AN AUTHORISATION

- 7.1 The suitability of a person to hold an authorisation may be brought into question
- (a) on conviction for a relevant offence because of enforcement by the Department, or
  - (b) on the Department learning of a relevant conviction following action by some other regulator (e.g. local authority, Customs & Excise).
- 7.2 In such circumstances the Department will seek a Post-Conviction Plan (as outlined in section 5) from that person in relation to that offence. The Department would expect a plan to be provided within 2 months of conviction or a month of sentencing (whichever is sooner), though a longer period could be allowed for cases of genuine difficulty.
- In the case of 7.1(a) above the investigating officer who secured the prosecution will inform the licensing/permitting team and the licensing/permitting officer responsible for the authorisation holder's principal place of business will request the Post-Conviction Plan.
- In the case of 7.1(b) above the licensing/permitting officer responsible for the authorisation holder's principal place of business will request the Post-Conviction Plan.
- 7.3 Details of the conviction and request for a Post-Conviction Plan are to be notified to the RCAP.
- 7.4 Any Post-Conviction Plan received, together with a covering note expressing licensing/permitting officer's views must be forwarded to the RCAP within 3 working days of receipt. Should no Post-Conviction Plan be produced within the set time, the fullest details of the offence together with a covering note must be forwarded.
- 7.5 The RCAP will apply the criteria set out in section 4 of this guidance to determine whether the Post-Conviction Plan should be accepted. The Panel will apply the criteria set out in section 6 in making their recommendations.
- 7.6 The licensing/permitting officer will be advised either to accept that the authorisation holder remains a suitable person to hold that authorisation, or will be advised to revoke the authorisation.
- 7.7 A holder of an authorisation has rights of appeal against any decision to revoke that authorisation. Normally lodging an appeal means that the authorisation continues in force until the appeal is determined.

## Annex 1

### LIST OF RELEVANT OFFENCES

Relevant offences are prescribed in the Waste Management Licensing Regulations (Northern Ireland) 2003 (as amended), the Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulations (Northern Ireland) 1999 and The PPC Regulations (Northern Ireland) 2003 (as amended) and are copied below. N.B. this list is correct at the time of issue of this guidance but subsequent legislation may amend this list further. This is not intended as a definitive or authoritative statement of the law.

Legislative provision	Broad scope of the enactment	Relevant for:			
		WML	PPC	Brokers	Carriers
Section 114 of the Public Health (Ireland) Act 1878	Nuisance.	x	x	x	x
Section 98(3) and (4) of the Local Government Act (Northern Ireland) 1972	Nuisance.	x	x	x	x
Articles 5, 7(4), 16(4), 18(2), 29, 38(4), 56 and 72(3) of the Pollution Control and Local Government (Northern Ireland) Order 1978	Waste disposal, effluent disposal, burning cable, etc.	x	x	x	x
Section 9(1) of the Food and Environment Protection Act 1985	Deposit and incineration at sea.	x	x	x	x
Paragraph 15(1), (3), (4) or (5) of Schedule 5 to the Finance Act 1996	Landfill tax	x	x		
The Transfrontier Shipment of Hazardous Waste Regulations 1988	Import or export of waste.		x		
Regulation 28 of The Transfrontier Shipment of Hazardous Waste Regulations 1988	Import or export of waste.	x			
The Transfrontier Shipment of Waste Regulations 1994	Import or export of waste		x	x	x
Regulation 15 of The Transfrontier Shipment of Waste Regulations 1994	Import or export of waste	x			
The Merchant Shipping (Prevention of Pollution by Garbage) Regulations 1988	Disposals into the sea of garbage from a ship.		x	x	x
Regulation 9 of The Merchant Shipping (Prevention of Pollution by Garbage) Regulations 1988	Disposals into the sea of garbage from a ship.	x			
Regulation 17 of the Merchant Shipping and Fishing Vessels (Port Waste Reception Facilities) Regulations 2003	Reception of waste at ports	x			

Legislative provision	Broad scope of the enactment	Relevant for:			
		WML	PPC	Brokers	Carriers
Regulation 14 of the Merchant Shipping (Port Waste Reception Facilities) Regulations 1997	Reception of waste at ports	x			
Articles 52 and 53 of the Diseases of Animals (Northern Ireland) Order 1981	Protection of animal health	x			
The Special Waste Regulations (Northern Ireland) 1998	Transport of special waste		x		
Regulation 17 of The Special Waste Regulations (Northern Ireland) 1998	Transport of special waste	x		x	x
Regulation 17 of The Pollution Control (Special Waste) Regulations (Northern Ireland) 1981	Transport of special waste	x			
The Pollution Control (Special Waste) Regulations (Northern Ireland) 1981	Transport of special waste		x		
Sections 5, 9(10) and 22 of the Water Act (Northern Ireland) 1972	Pollution of controlled waters.			x	x
Articles 20(2), 34(1) and 39(3) of the Water and Sewerage Services (Northern Ireland) Order 1973	Pollution of controlled waters.	x			
Articles 7(1), 7(5), 9(4), 12(3), 19(1), 28(3) and 29(1) of the Water (Northern Ireland) Order 1999	Pollution of controlled waters.	x			
Articles 7(1), 9(1), 28(3) and 29 of the Water (Northern Ireland) Order 1999	Pollution of controlled waters		x		
Section 17(3) of the Transport Act (Northern Ireland) 1967	Carriage of goods & operators licence			x	x
Article 23(1) of the Industrial Pollution Control (Northern Ireland) Order 1997	Pollution of the air	x	x	x	x
Articles 4, 5(8), 18, 22(6), 27(5), 28(5) and (6), 31(2), 38, 42, 43(9), 44(2) and 74 of the Waste and Contaminated Land (Northern Ireland) Order 1997	Pollution control, waste management, nuisance			x	x
Articles 4, 5(8), 6(7), 12(12), 18, 22(6), 27(5), 28(5), 31(2), 38(1), 42(4), 43(9), 44(2) and 74 of the Waste and Contaminated Land (Northern Ireland) Order 1997	Pollution control, waste management, nuisance	x			
Articles 4, 5(8), 22(6), 38(1), 42, 43(9), 44(2), and 74 of the Waste and Contaminated Land (Northern Ireland) Order 1997	Pollution control, waste management, nuisance		x		

Legislative provision	Broad scope of the enactment	Relevant for:			
		WML	PPC	Brokers	Carriers
Regulations 18(1), 22(1) of and paragraphs 12(1) and (2) and 14(5), (7) and (8) of Part I of Schedule 3 to the Waste Management Licensing Regulations (Northern Ireland) 2003 (as amended)	Waste management licences, exemptions, registration of carriers and brokers	x			
Regulations 31 and 42(1), (2) of the End of Life vehicles Regulations 2003	End of life vehicles	x			
Regulation 33(1) of the Pollution Prevention and Control Regulations (Northern Ireland) 2003 (as amended)	PPC permits	x	x		

WML = waste management licensing,

Brokers = registration as a waste broker

PPC = pollution prevention and control

Carriers = registration of waste carriers

**ANNEX 2****ASSESSING THE RELEVANCE OF CONVICTION INFORMATION TO AN APPLICATION**

When assessing the relevance of the information returned from a court or from other sources, the only information that is important to connect the details to an application is the name of the convicted person or entity.

People relevant to an application

**In the case of an application from an individual**

<b>Relevant Name from Application</b>	<b>Relevant Convictions</b>	<b>Relevant Information</b>
Applicant Name	This includes all convictions of the individual, or of any partnership whilst this person was a partner in that partnership or the conviction of any company whilst this person was a director of that company	<ul style="list-style-type: none"> <li>Name of the person - Full match for information supplied by the court – supplied names match in a database search</li> <li>Date of birth - Must be identical</li> </ul>

**In the case of a partnership**

<b>Relevant Name from Application</b>	<b>Relevant Convictions</b>	<b>Relevant Information</b>
Partnership Business or Trading Name	Any company that has received a conviction using an identical name to the applicant name	<ul style="list-style-type: none"> <li>Name of Business - Full match of the trading or Business name</li> </ul>
Individual Partner Name	this includes all convictions of the individual, or of any partnership whilst this person was a partner in that partnership or the conviction of any company whilst this person was a director of that company	<ul style="list-style-type: none"> <li>Name of the person - Full match for information supplied by the court – supplied names match in a database search</li> <li>Date of birth - Must be identical</li> </ul>

**In the case of a limited company**

<b>Relevant Name from Application</b>	<b>Relevant Convictions</b>	<b>Relevant Information</b>
Business or Trading Name	Any company that has received a conviction using an identical name to the applicant name	<ul style="list-style-type: none"> <li>Name of Business - Full match of the trading or Business name</li> <li>Company Registration Number Identical company registration numbers</li> </ul>
Individual Director Name	this includes all convictions of the individual, or of any partnership whilst this person was a partner in that partnership or the conviction of any company whilst this person was a director of that company	<ul style="list-style-type: none"> <li>Name of the person - Full match for information supplied by the court – supplied names match in a database search</li> <li>Date of birth - Must be identical</li> </ul>

**In the case of another organisation type**

Relevant Name from Application	Relevant Convictions	Relevant Information
Business or Trading Name	Any company that has received a conviction using an identical name to the applicant name	<ul style="list-style-type: none"> <li>• Name of Business - Full match of the trading or Business name</li> <li>• Company Registration Number Identical company registration numbers</li> </ul>
Individual Executive Name	this includes all convictions of the individual, or of any partnership whilst this person was a partner in that partnership or the conviction of any company whilst this person was a director of that company	<ul style="list-style-type: none"> <li>• Name of the person - Full match for information supplied by the court – supplied names match in a database search</li> <li>• Date of birth - Must be identical</li> </ul>

**IF A PERFECT MATCH CAN BE MADE IN ACCORDANCE WITH COLUMN 3 OF THE RELEVANT TABLE ABOVE, THIS CONVICTION SHOULD BE CONSIDERED IN THE ASSESSMENT OF THE APPLICATION, WHETHER ADMITTED BY THE APPLICANT OR NOT.**



Our aim is to protect, conserve and promote the natural and built environment for the benefit of present and future generations.

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