

Judicial Review

Claim form

For Court use only 16 Apr 2024

Name of court

Reference number AC-2024-CDF-000059

Date

Day	Month	Year
<input type="text"/>	<input type="text"/>	<input type="text"/>



Help with fees reference number

- -

The rules relating to applications for Judicial Review are contained in CPR Part 54, and Practice Directions 54A – D. Search for the CPR on www.justice.gov.uk.



Additional information about judicial review proceedings can be found in the Administrative Court Judicial Review Guide. Search for the Guide on www.gov.uk.

Time Limit for filing a claim

A claim form must be filed promptly, and in any event **not later than 3 months** after the grounds to make the claim first arose: see

CPR54.5(1).

Section 1 – Details of the claimant and defendant

1. Claimant name and address(es)

Note: If there is more than one claimant, set out the details required by questions 1, 1.1 and 1.2 on a separate sheet, marking that sheet so that it is clear it relates to this part of the claim form.

First name(s)

Last name

Address

Building and street

Second line of address

Town or city

County (optional)

Postcode

Phone number

Email (if you have one)

1.1 Claimant or claimant's legal representative's address to which documents should be sent.

Name of claimant or claimant's legal representative's

Name of firm (if applicable)

Address for service

Building and street

Second line of address

Town or city

County (optional)

Postcode

Phone number

Email

Reference number (if applicable)

Note 1.1: CPR 6.23 requires each party to proceedings to provide an address for service which must be an address in the United Kingdom. Communication concerning the claim is sent to this address. If a solicitor or legal representative acts for you, give that address (if in the United Kingdom). If not, provide an address to which communication concerning this claim should be sent.

1.2 Claimant's Counsel's details

First name(s)

Last name

Address

Building and street

Second line of address

Town or city

County (optional)

Postcode

Phone number

Email

1.3 1st Defendant's name

Independent Office for Police Conduct (IOPC)

1.4 Defendant or (where known) Defendant's legal representative's address to which documents should be sent.

Address

Building and street

PO Box 473

Second line of address

Sale

Town or city

Manchester

County (optional)

Postcode

M 3 3 0 B W

Phone number

0300 020 0096

Email

legal.admin@policeconduct.gov.uk

Reference number (if known)

1.5 2nd Defendant's name

Chief Officer for Hampshire

1.6 Defendant's or (where known) Defendant's legal representative's address to which documents should be sent.

Address

Building and street

Police & Fire Headquarters

Second line of address

Leigh Road

Town or city

Eastleigh

County (optional)

Hampshire

Postcode

S O 5 0 9 S J

Phone number

01962 841534

Email

civil.litigation@hampshire.pnn.police.uk

Reference number (if applicable)

Section 2 – Interested parties

2.1 Interested party

Name

Organisation (if applicable)

Address

Building and street

Second line of address

Town or city

County (optional)

Postcode

--	--	--	--	--	--	--	--	--	--

Phone number

Email

Reference number (if applicable)

Note 2: An Interested Party is someone other than a defendant who is directly affected by the claim.

Where the claim for judicial review relates to proceedings in a court or tribunal, any other parties to those proceedings must be named in the claim form as interested parties. Full details of interested parties must be included in the claim form. For example, if you were a defendant in a criminal case in the Magistrates or Crown Court and are making a claim for judicial review of a decision in that case, the prosecution must be named as an interested party. In a claim which does not relate to a decision of a court or tribunal, you should give details of any persons directly affected by the decision you wish to challenge.

If you consider there is more than one interested party, set out their details on a separate sheet, marking that sheet so that it is clear it relates to this part of the claim form.

Section 3 – Details of the decision to be judicially reviewed

Note 3.1: Use a separate sheet if you need more space for your answers, marking clearly which section the information refers to.

3.1 Give details of the decision you seek to have judicially reviewed.

8 decisions. Dated 31/1/2022. Included with this submission as documents D1, D2, D3, D4, D5, D6, D7 and D8.

3.2 Date of decision

Day

3 1

Month

0 1

Year

2 0 2 4

3.3 Name and address of the court, tribunal, person or body who made the decision to be reviewed.

Name

Independent Office for Police Conduct and Hampshire Constabulary (Defendants 1 and 2)

Address

Building and street

Second line of address

Town or city

County (optional)

Postcode

Section 4 – Permission to proceed with a claim for judicial review

This section must be completed. You must answer all the questions and give further details where required.

4.1 I am seeking permission to proceed with my claim for Judicial Review.

Is this application being made under the terms of paragraph 17 Practice Direction 54A (Challenging removal)?

Yes

No

4.2 Does your claim, or any interlocutory application, for example for interim relief or expedition, need to be decided urgently – i.e. within 7 days?

Yes. Complete form **N463** and file this with your application.

No

4.3 Are you making any non-urgent interlocutory applications?

Yes. Complete Section 9.

No

4.4 Does any part of the claim allege a breach of Convention rights protected under the Human Rights Act?

Yes. Identify the Convention rights you contend have been breached in the box below

No

4.5 Have you complied with the pre-action protocol?

Note 4.5: See Practice Direction 54C.

Yes

No. Give reasons for non-compliance in the box below.

4.6 Have you filed this claim in the region with which the claim is most closely connected?

Yes. Give any additional reasons for wanting it to be dealt with in this region in the box below

No. Give reasons in the box below

4.7 Is the claimant in receipt of a Civil Legal Aid Certificate?

Yes

No

Section 5 – Statement of facts relied on

set out below

attached

Please refer to the included Claimant's witness statement to be found on pages 9 to 14 of the included separate accompanying document.

Note 5: Set out the facts on which your claim is based: see Practice Direction 54A, paragraph 4.2. Use separate sheets if you need more space; mark the sheets so that it is clear they relate to this section of the claim form.

Section 6 – Detailed statement of grounds

6.1 The detailed statement of grounds are:

set out below

attached

Please refer to the included Claimant's grounds statement to be found on pages 1 to 8 of the included separate accompanying document.

Note 6: Set out each ground of challenge: see Practice Direction 54A at paragraph 4.2. Use separate sheets if you need more space; mark the sheets so that it is clear they relate to this section of the claim form.

Section 7 – Aarhus Convention claim

7.1 Is this claim an Aarhus Convention claim

Yes. Give reasons why in the box below.

No

7.2 Do you wish the court to vary or remove the limits on costs recoverable from a party?

Yes. Give reasons why in the box below.

No

Note 7: For the definition of an Aarhus claim, see CPR 45.41. The cost limit provisions are at CPR 45.43 – 44.

Section 8 – Details of remedy (including any interim remedy) being sought

8 mandatory orders requiring the Defendants to re-access and re-issue new decisions based on the highlighted serious legal failings identified by way of this application. And related declarations in reference to the listed breaches to law as included in the attached Claimants statement of grounds.

Note 8: State precisely the terms of the order you ask the court to make. The available remedies are at CPR 54.2 – 3. The court may make any/all of the following orders:

- (a) a mandatory order;
- (b) a prohibiting order;
- (c) a quashing order; or
- (d) an injunction restraining a person from acting in any office in which he is not entitled to act.

A claim for damages may be included but only if you are seeking one of the orders set out above.

Section 9 – Other applications (non-urgent)

9.1 I wish to make the following applications for directions and/or interlocutory orders:

Note 9: If you wish to make any interlocutory application now, set out the application and the reasons and/or evidence relied on in support of it in this Section. Use separate sheets if you need more space; mark the sheets so that it is clear they relate to this section of the claim form.

If, after this claim form has been filed, you wish to make an interlocutory application, use form N244.

Section 10 – Supporting documents

The Claim Form must include or be accompanied by certain documents: see Practice Direction 54A, paragraph 4.4(1) – (2).

Please complete the checklist below

- 10.1 Statement of Facts
- 10.2 Statement of Grounds
- 10.3 Any written evidence relied on in support of the claim.
- 10.4 Any written evidence in support of any other application contained in the claim form
- 10.5 If the claim seeks to have any order quashed, a copy of the order.
- 10.6 If the claim for judicial review is directed to a decision of a public authority, a copy of the decision challenged.
- 10.7 If the claim for judicial review is directed to the decision of a court or tribunal, an approved copy of the reasons for the decision.
- 10.8 Copies of any documents relied on.
- 10.9 A copy of any statutory material relevant to the claim.
- 10.10 A list of essential documents for advance reading by the court.
- 10.11 If paragraph 17 of Practice Direction 54A applies to the claim, copies of the documents specified at paragraph 17.2(1) (a) – (d).

If it has not been possible to file any of the above documents, state the reason why the document is not available.

Reasons why you have not supplied a document and date when you expect it to be available:-

I have requested documents from the Defendants under the duty of candour repeatedly. Documents and evidence which are highly germane to these proceedings for the Court to be able to reach an informed decision. Not yet supplied. Please see request to the Defendant's on page 14 in the accompanying document for the details.

10.12 If you contend the claim is an Aarhus Convention claim, the financial information required by CPR 45.42.

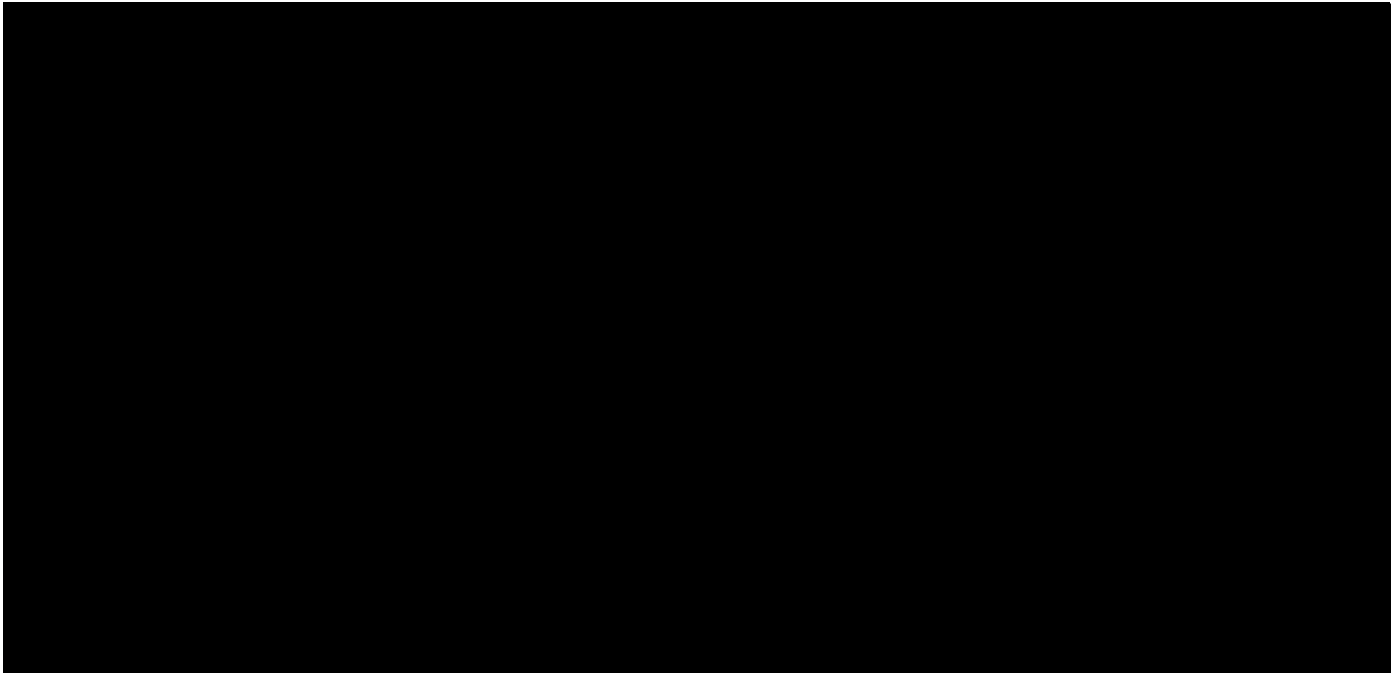
10.13 A copy of the legal aid or Civil Legal Aid certificate (if applicable)

Statement of truth

I understand that proceedings for contempt of court may be brought against a person who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

I believe that the facts stated in this form are true.

The claimant believes that the facts stated in this form are true. **I am authorised** by the claimant to sign this statement.



Full name

If claimant's legal representative, state name and firm

If signing on behalf of firm or company give position or office held

The Court and venue

CPR part 54 – claims for Judicial Review are dealt with by the Administrative Court.

The general expectation is that proceedings will be administered and determined in the region with which the claim has closest connection; see Practice Direction 54C paragraph 2.5.

- Where the claim is proceeding in the Administrative Court in **London**, documents must be filed in the Administrative Court Office, Room C315, Royal Courts of Justice, Strand, London, WC2A 2LL.
- Where the claim is proceeding in the Administrative Court in **Birmingham**, documents must be filed in the Administrative Court Office, Birmingham Civil Justice Centre, Priory Courts, 33 Bull Street, Birmingham B4 6DS.
- Where the claim is proceeding in the Administrative Court in **Wales**, documents must be filed in the Administrative Court Office, Cardiff Civil Justice Centre, 2 Park Street, Cardiff, CF10 1ET.
- Where the claim is proceeding in the Administrative Court in **Leeds**, documents must be filed in the Administrative Court Office, Leeds Combined Court Centre, 1 Oxford Row, Leeds, LS1 3BG.
- Where the claim is proceeding in the Administrative Court in **Manchester**, documents must be filed in the Administrative Court Office, Manchester Civil Justice Centre, 1 Bridge Street West, Manchester, M3 3FX.

Section 2 – Interested parties

2.1 Interested party

Name

Police and Crime Commissioner for Hampshire

Organisation (if applicable)

Address

Building and street

OPCC, The Long Barn, Dean Estate

Second line of address

Wickham Road

Town or city

Fareham

County (optional)

Hampshire

Postcode

P | O | 1 | 7 | 5 | B | N

Phone number

01962 871595

Email

opcc@hampshire.police.uk

Reference number (if applicable)

SC004

Note 2: An Interested Party is someone other than a defendant who is directly affected by the claim.

Where the claim for judicial review relates to proceedings in a court or tribunal, any other parties to those proceedings must be named in the claim form as interested parties. Full details of interested parties must be included in the claim form. For example, if you were a defendant in a criminal case in the Magistrates or Crown Court and are making a claim for judicial review of a decision in that case, the prosecution must be named as an interested party. In a claim which does not relate to a decision of a court or tribunal, you should give details of any persons directly affected by the decision you wish to challenge.

If you consider there is more than one interested party, set out their details on a separate sheet, marking that sheet so that it is clear it relates to this part of the claim form.



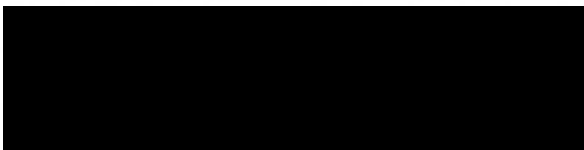
Claimants Skeleton Argument

The argument is a straight forward one with far reaching consequences for the public good. Simply put. Can it ever be legal for the policing authorities not to weigh, apply and answer substantive evidence when determining serious police misconduct complaints from members of the public. The answer of course is no.

However that is just what has transpired here in relation to compelling evidence from an authoritative third party (Dorset Police). The evidence provided establishes at the very least a strong prima facia case of gross misconduct on the part of an individual in Hampshire Police's Professional Standards Department for writing a false police report (conduct assessment) into Hampshire Constabularies confirmed bungled handling of child sexual abuse case. Legal failings which saw the case kept out of the police system for 2 years prior to the Claimant's (my) involvement. These serious atrocious and proven legal failings resulted in 17 offences against children going on to be committed that could have easily been stopped if not for Hampshire Police's negligence in dealing with case.

This challenge is not about the already proven aforementioned legal failings. They are confirmed and not under dispute. It is about the subsequent production of a false police report by Hampshire Constabulary into the handling of the case, and the non application of substantive evidence in relation to complaint outcomes. And additionally the evidence that also firmly demonstrates a systemic and pervasive culture of "evidence blindness" within Hampshire Constabularies Professional Standards Department when it comes to serious gross misconduct complaints against its police officers and members, all while the IOPC looks on.


This is explained and expanded by reference to the include Grounds and Claimant's Witness statement accompanying my submission.




Witness Statement

Date 10/04/2024

To be read in conjunction with my accompanying statement of Grounds

- 
- 1) This statement relates to the outcomes of eight complaints made to Hampshire Constabulary and subsequently the IOPC under the provisions of the Police Reform Act 2002 and related statutory guidance (2020).
 - 2) Seven of the challenged complaint outcomes are dated 31/01/2020 (included as exhibits D1-D6 and D7). Fundamentally and pivotally these decisions all relate to Hampshire Constabulary and the IOPC unlawfully not actioning or answering evidence as submitted by the complainant (me) from an authoritative third party source (Dorset Police) establishing a very strong prima facie case Hampshire Police produced a false police report into the handling of a child sexual abuse case which it unlawfully kept out of police system for 2 years, until after my involvement. These police failings by Hampshire Police resulted in 17 offences committed against children which could have been easily stopped had the case not been unlawfully kept out of the police system for 2 years by Hampshire Police. What is not disputed and never has been is that a child sex offender would have been left on the streets unchecked if not for my endeavours as a concerned parent of a pupil who was taught by this individual at the Arnewood School in New Milton, Hampshire.
 - 3) The background to these established very serious legal failings and underpinning facts are best highlighted by way of correspondence to and from the Children's Commissioner for England and various other documents I have included in this submission as (EX 18).
 - 4) Notwithstanding this challenge is not about these serious and now established and factual legal failings of Hampshire Police as identified above. These are not in dispute. Rather it is about the subsequent evidence referenced below sent to me by Dorset police in 2022 and 2023 proving a subsequent "conduct assessment" produced by Mr. Stephen Franks of Hampshire PSD into its handling of the case was substantively false. This "conduct assessment" was brought about once again by my endeavours and the help of the then Children's Commissioner for England Anne Elizabeth Longfield CBE after Hampshire Police failed to carry one out per guidance. It was sent directly to me given my involvement. It contains as yet uncorrected lies as corroborated by the information/evidence provided to me by an authoritative third party (Dorset Police). This evidence has not been disputed, or even answered by either Defendant. Its application to the decision making process is conspicuous by its absence from either Defendant's responses

[REDACTED]

to my complaints and these decisions. It has therefore never informed the decision making process of either party. This is unlawful. Evidence must be weighed. Everyone should know that.

- 5) The report complained of is included as (EX 01) which is the false conduct assessment report produced by Mr. Stephen Franks of Hampshire Police's Professional Standards Department (PSD) in relation to the handling of the underpinning child sexual abuse case. The evidence from Dorset Police officers establishing at the very least a very strong prima facie case the report is substantively false is included by way of exhibits (EX 02, 03 and 04).

The obvious reason as to why Dorset Police's evidence shows this report to be highly suspect is known by both Defendants. It really can't be missed:

----->

[REDACTED]

Sent: 23 February 2024 10:17
To: 'Danny Simpson'; 'civil.litigation@hampshire.pnn.police.uk'
Cc: 'chief.constable@hampshire.pnn.police.uk'
Subject: RE: Proposed Judicial Review of IOPC decisions dated 31 January 2024

Dear Mr. Simpson,

Thank you for your response to my letter of claim.

May I ask why you have not provided the investigation reports I requested under your clients duty of candour ?

Additionally you maintain Dorset Police's evidence does not contradict the assessment report. Note:

Quote from assessment:

"the matter was referred to Dorset Police who decided that a single agency referral was appropriate and could be conducted by the school."

So it tells us Dorset Police made the decisions on the case.

Extract from Dorset Police's evidence:

1. No file or any evidence on the Tyrone Mark case was sent to Dorset Police at anytime.
2. No crime was recorded under the HOCA.
3. Dorset Police did not investigate.
4. Dorset Police did not make any decisions on the case.
5. Dorset Police did not decide the case should be handled on a single agency basis.
6. The case was not transferred to Dorset Police by Hampshire Police.

This is a serious oversight that you need correct for the benefit of the Court. If you now provide me with the investigation reports (given the Chief Officer maintains this evidence has been instigated before) and explain how points 4 & 5 in the evidence from Dorset

[REDACTED]

Police do not explicitly contradict the referenced statement in the assessment provided above, I will not proceed.

Likewise:

Then we have the implicit meaning of the assessment which is clearly designed about improperly passing responsibility to Dorset Police for the initial catastrophic handling of the case.

Thank you

[REDACTED]

To re-iterate any analysis of the underpinning evidence is totally void and completely absent from the decision makers decisions. Furthermore that position now remains unchanged even in the face of these High Court proceedings. Albeit this evidence is pivotal in allowing the Court to determine a proper outcome. Evidence is everything.

6) EX 06, 07, and 08 show the representations I made to Ms. Ester Myers Robins an IOPC caseworker dealing with one of the complaints. Similarly EX 09 are the representations made to Mr. Keith Howell who dealt with the others on the part of the IOPC the first Defendant. The Court will note the real issues raised as posed by the evidence from Dorset Police have really not got a look in. The evidence from Dorset Police Officers is not properly answered nor disputed anywhere. Furthermore no enquires were made to find out if the provided evidence had or has ever been more investigated by Hampshire Police as it falsely maintains.

You cannot begin to deal with any complaint competently, fairly and transparently without first determining the veracity of the allegations. That is Hampshire PSD manufactured a false report into its handling of a child sexual abuse case, and various individuals lied about it being investigated. That means examining the evidence. Here no enquires were made by the decision makers to this end. Albeit very easy to prove, all they has to do was ask Hampshire PSD to produce the investigations reports to substantiate its position this evidence had already been investigated, hence corroborating its insistence the complaint was an abuse of process, and vexatious based on its repeated assertion and war cry the complaint (and Dorset Police's evidence) had been investigated before. This was and is a very easily provable lie. Both IOPC decision makers were wholly remiss by avoiding the obvious way to proceed and by not addressing or putting their mind to the very obvious requirement to examine and answer evidence, and ask a relevant question or two of Hampshire Police. Apart from the application of simple common sense there are many statutory rules and regulations this is in breach of. Which are made clear in my STATEMENT OF GROUNDS included with this submission. The Defendants cannot determine police misconduct either way by precluding to examine substantive supporting

evidence. This is a massive legal failing. And here it relates squarely to deceit relating to the handling of child sexual abuse case.

- 7) The extent to which Hampshire Police are avoiding answering the obvious and refusing to admit Dorset Police's evidence has never been investigated is further made apparent by way of unlawfully refused SAR request/s and an unlawfully ignored complaint about not furnishing me with the investigation outcome reports into the evidence I have provided to Hampshire Police, to which I would be entitled as a matter of right under the statutory guidance if Dorset Police evidence supporting these complaints had actually been investigated anywhere at all. Likewise all the decision makers were fully apprised of the fact Hampshire Police could not produce the documents (investigation reports) proving my complaints were vexatious and an abuse of process based on the fact they were repetitive as the evidence had been investigated and answered before. Why not? Well because it is an obvious lie. And all any of the decision makers had to do to easily and quickly establish this was to ask Hampshire's PSD to produce the investigation report/s that substantiated Hampshire Constabulary position was true, that is matters and the evidence had already been investigated. They never did, and ignored my request to provide me with a copy of these "investigation reports" if they did exist. They really do not. Refer to exhibits EX 10, EX 11a/b and EX 12.
- 8) We have now reached the impasse where both Defendants cases hinge on the assertion Dorset Police's evidence has already been dealt with by way of investigation and hence my complaints are repetitive and an abuse of process VS my allegation this defence is wholly unfounded and untrue. However despite the duty of candour neither Defendant can or will produce the reports that would prove them to be correct and me wrong for the Court's benefit, nor confirm no such reports really exist. This is a highly probative fact from which I am sure the Court will no doubt draw its own inferences. Refer to (EX 15) and (EX 05)
- 9) In the spirit of the overriding objective I have made many offers to the Defendant's to withdraw this challenge if they simply provide me with the investigation reports into my complaint about the false conduct assessment to prove what is under dispute, that is their defence based on the premise the matter has been previously investigated before is true or not. I know it not to be. This goes to the heart of the challenge. Refer to (EX 16).
- 10) Additionally not taking evidence into account has very serious ramifications for the public good regarding the rules on serious misconduct complaints having to be initially "referred" in to the IOPC by the police within 24 hours of receipt. This statutory rule is designed to safeguard the public good from serious police misconduct. Here that did not happen due to a clear wilful failure to apply the evidence. Having no regard to evidence sets a very dangerous and unlawful precedent. And here we are talking about a false police report into the handling of a child sexual abuse case. I refer to the Court to Grounds number 8 in my

[REDACTED]

statement of grounds which highlight this further very serious legal failing on the part of both Defendants.

11) Both Defendant's are fully aware by way of High Court case CO/2550/2018 the "vexatious" and "repetitive" arguments here hold no succour with the Court. Here the Honourable Mr. Justice Garnham gave permission to proceed in the face of the same arguments presented now. This case resulted in the IOPC agreeing by way of a consent order to direct Hampshire Constabulary to deal with a complaint about the false report under the provisions of the Home Office Crime Recording Rules (HOCR). This would have meant having regard to the evidence as is a requirement of those mandatory rules. However Hampshire Constabulary then petitioned the Court requesting the order be changed from a "direction" to a "recommendation" due to a change in the law. The Court then by way of a decision by His Honour Judge Keyser QC permitted the change to the order. This permitted Hampshire Constabulary not to be encumbered with a direction it had to comply with but rather with a loose "recommendation" from the watch dog that it was not legally bound to adhere to. This once again gave Hampshire Constabulary free range to ignore the evidence. Which it did by dismissing the resulting IOPC recommendation. It is important to note Mr. Justice Garnham's decision was based on less evidence than is available now. This new challenge is based on new even more convincing evidence which was subsequently provided to me in Sep of 2022 and Apr of 2023 by Dorset Police Officers. This new evidence goes further in proving the same allegation – that is the report produced by Hampshire Constabulary into the handling of the Arnewood School teacher child sexual abuse case is substantively false. Although not completely identical these cases are on all fours in relation to being about a challenge to the false report and ignored evidence. Unfortunately now as before the new evidence too has been ignored and remains unanswered by way of all the same tricks that did not persuade the Court in CO/2550/2018. It is important to note the evidence presented in both cases is courtesy of an authoritative third Party (Dorset Police), and not me. So if the parties dispute the provided evidence perhaps they should be addressing and answering it and calling Dorset Police names not me. Here I direct the Court to EX 17 for the claim form, orders and rulings relating to case CO/2550/2018.

STATEMENT OF TRUTH

[REDACTED]

GROUNDS

FAILINGS UNDER THE POLICE REFORM ACT 2002, IOPC STATUTORY GUIDANCE, POLICE REGULATIONS 2020 AND DATA PROTECTION ACT 2018

1) THE COMPLAINT IS NOT REPETITIVE AS NONE OF THE UNDERPINNING EVIDENCE HAS NEVER BEEN ANSWERED OR ENQUIRED INTO OR INVESTIGATED BY EITHER DEFENDANT AT ANY TIME:

Therefore it is not factually correct the complaint is dismissed as “repetitious” under the legal definition:

The Statutory IOPC guidance informs us

What is meant by ‘repetitious’?

8.19 For the purposes of the decisions in the above flowchart, a repetitious matter is one ⁵²:

- that concerns substantially the same conduct as a previous complaint or recorded conduct matter
- where there is no fresh indication that a person serving with the police may have committed a criminal offence or behaved in a way which would justify the bringing of disciplinary proceedings ⁵³
- where there is no fresh substantive ⁵⁴evidence, which was not reasonably available at the time the previous complaint was made or previous conduct matter was recorded, and
- the previous complaint or conduct matter has been, or is being, investigated or (in the case of a complaint) otherwise handled in accordance with Schedule 3

The underpinning legislation

⁵¹ Paragraph 10, Schedule 3, Police Reform Act 2002; Paragraph 11, Schedule 3, Police Reform Act 2002; Paragraph 13, Schedule 3, Police Reform Act 2002.

⁵² Regulation 7, Police (Complaints and Misconduct) Regulations 2020.

⁵³ See glossary for the definition of disciplinary proceedings – in this case, for members of a police force or special constables, disciplinary proceedings means any proceedings under the Police (Conduct) Regulations 2020, apart from the Reflective Practice Review Process. It does not include unsatisfactory performance procedures. For any other person serving with the police it means any proceedings or management process during which that person’s conduct, rather than their performance, is considered for the purposes of deciding whether any sanction or punitive measure should be imposed against them for that conduct.

⁵⁴ ‘Substantive’ evidence means, for example, evidence of a material fact which is in dispute or may have a bearing on the outcome of the conduct matter, as distinct from evidence of matters peripheral to the conduct matter and highly unlikely to have any bearing on the outcome.

2) THE COMPLAINT CANNOT BE VEXATIOUS AND/OR AN ABUSE OF PROCESS

Neither can the complaint be classified as “vexatious” by the Defendant’s to disregard evidence. Both the new 2020 guidance and the old 2015 guidance tell us this cannot be the case here. Notwithstanding a competent determination cannot be made either way without answering and applying that little thing called evidence.

And here the evidence is from an authoritative third party (Dorset Police). My word need not be taken.

The statutory IOPC 2020 guidance also informs us:

12.11 There may be circumstances where some enquiries are needed before it can be established that it is reasonable and proportionate to take no further action to handle the complaint after recording it. These circumstances include, for example, where:

.....

.....

Evidence demonstrates that the complainant is using the complaints system purely to vex, worry, annoy or embarrass and there is no foundation to the complaint.

The statutory IOPC 2015 guidance is further common sense confirmation. It helpfully gives us the definition as:

Vexatious complaint

A complaint that is without foundation, which is intended, or tends, to vex, worry, annoy or embarrass.

It also tells us at 4.15: It is important to note that it is the complaint itself that must be judged vexatious, oppressive or an abuse, not the complainant.....

3) MISAPPLICATION OF THE "PROPORTIONALITY" AND "REASONABLENESS" TEST BY NOT TAKING EVIDENCE INTO ACCOUNT.

From the statutory guidance

3.18 Complaint handlers should consider the fairness of their actions on all those involved in a complaint. They should ensure that the decisions they make:

- are impartial, free from bias (or the appearance of bias) or discrimination, having considered the perspectives provided by all parties
- are logical and justifiable with reference to the relevant available evidence
- do not place undue weight on any given consideration
- are accompanied by a clear, evidence-based rationale

4) NON APPLICATION OF 10.9 OF THE STATUTORY GUIDANCE AND REGULATIONS REGARDING THE MANDATORY REQUIREMENT TO TAKE EVIDENCE INTO ACCOUNT BEFORE DISMISSING COMPLAINTS FROM MEMBERS OF THE PUBLIC.

Here both Defendants have failed to take substantive evidence into account. Not even cursory enquiries were undertaken. The evidence provided by Dorset Police was simply avoided by both Defendants at all costs and remains unanswered. Thereby unlawfully avoiding the application of the "indication" test. Evidence cannot be ignored. There are no exceptions that permit this (of course). Not a single complaint about the false police report has ever been investigated. Nor is the assessment itself a complaint outcome. It is a mandatory assessment. I was precluded from complaining about the raft of identified legal failings identified in the

assessment report. However I am not precluded from complaining about being lied to by way of being sent a false police report where I had previously provided evidence that had directly refuted its content.

10.9 Where there is doubt whether or not there is an 'indication', this may suggest that it is reasonable and proportionate to investigate. Where a decision is made that there is no indication, but during subsequent handling the complaint handler considers that the indication test may now be met, the complaint handler should highlight the matter to the appropriate authority to consider whether the complaint must now be investigated.

Regulation 6, Police (Complaints and Misconduct) Regulations 2020

Exceptions to the duty to investigate complaints

The duty to investigate a complaint does not apply where the appropriate authority determines that:

the complaint concerns substantially the same:

- conduct or other matter as a complaint made previously, or
- conduct as a conduct matter recorded previously

there is no fresh indication in respect of that conduct or other matter that:

- a person serving with the police may have committed a criminal offence or behaved in a manner that would justify the bringing of disciplinary proceedings⁷¹, or
- there may have been the infringement of a person's rights under Article 2 or 3 of the European Convention on Human Rights;

there is no fresh substantive evidence which was not reasonably available at the time the previous complaint was made or the previous conduct matter was recorded; and

the previous complaint or conduct matter:

- has been, or is being, investigated
- (in the case of a complaint) has been, or is being, otherwise handled in accordance with Schedule 3
- (in the case of a complaint) has previously been withdrawn (see Chapter 16) and, therefore, the provisions of Part 2 to the Police Reform Act 2002 ceased to apply to that previous complaint

5) WEDNESSBURY UNREASONABLENESS.

There can be no accountability or proper outcomes to police complaints by the omission of the basic common sense requirement to review and answer evidence as has happened here. Any competent IOPC case worker or member of the police professional standards department must surely know this. It is a very basic and underlying legal principle that most people on the street understand, yet bizarrely has found no place here. That more than quantifies this given legal failing on the part of the Defendants here as irrational and unreasonable, and wholly contrary to the public good. The word "EVIDENCE" occurs in the guidance 78 times. Evidence is key, we all know that. So should the Defendants. It is even written down for them and in more than one place:

10.7 'Indication' is taken to have its plain English definition. In making the decision about whether there is 'an indication', the appropriate authority should consider whether the circumstances, and the evidence readily available, show or reasonably imply that a person serving with the police may have committed a criminal offence or behaved in a manner that would justify the bringing of disciplinary proceedings, or that there may have been the infringement of a person's rights under Articles 2 or 3. This decision should take account of the facts being asserted by the complainant, alongside any readily available evidence, and not focus solely on what the complainant says those facts amount to⁶⁹. Where a complainant alleges, for example, that an offence has been committed without explaining what has been done that they believe

constitutes that offence, the appropriate authority should seek further information and clarification from the complainant before making the decision regarding whether there is an indication.

Another example of the all important principle of taking evidence into account:

17.3 Conclusions reached should be impartial and logical, based on the facts of the case and giving appropriate weight to relevant evidence. They should be supported by sound rationale. The outcome should seek to address and remedy any issues identified during handling.

6) NOT TAKING RELEVANT CONSERATIONS INTO ACCOUNT

The evidence I submitted to both Defendant's simply has not been applied to the decision making process. Side stepping substantive evidence in this manner could not be a better example of this legal failing. Decision makers cannot arrive at fair, proper and proportionate outcomes without appraising and evaluating substantive evidence in reaching a determination.

7) NOT PROVIDING REASONS AND EXPLANTIONS

Neither Defendants have ever addressed and answered the evidence from Dorset Police. This legal failing is made very clear by way of the content of the challenged outcomes and the abject lack of transparency they show in relation to the provided evidence.

3.19 To be fair and effective, decisions also need to be made transparently (as far as is possible) and in a timely manner. Wherever possible (subject to the exemptions outlined in paragraphs 11.16 – 11.20) they should be communicated to all those involved and supported by a clear rationale that allows everyone involved to understand them.

8) NON COMPLIANCE WITH THE "REFERRAL" CRITERIA IN THE STATUTORY GUIDANCE TO REFER SERIOUS MICONDUCT COMPLAINTS TO THE IOPC.

Producing a substantively false police report into the handling of a child sexual abuse case more than meets the mandatory criteria for "referral" or "calling in". Both Defendants have circumvented this vital legal requirement as well by choosing not to weigh and address the provided evidence.

9.1 Complaints that must be referred to the IOPC

Appropriate authorities must refer to the IOPC complaints which:

- allege that the conduct or other matter complained of has resulted in death or serious injury;
- fall within the mandatory referral criteria (see below); or
- the IOPC notifies the appropriate authority that it must refer

Paragraph 4, Schedule 3, Police Reform Act 2002

9.4 Mandatory referral criteria

The appropriate authority must refer complaints and recordable conduct matters that include allegations of conduct which constitutes:

- a serious assault
- a serious sexual offence
- serious corruption, including abuse of position for a sexual purpose or for the purpose of pursuing an improper emotional relationship

- a criminal offence or behaviour which is liable to lead to disciplinary proceedings and which, in either case, is aggravated by discriminatory behaviour on the grounds of a person's race, sex, religion or other status identified in paragraph 9.24 of this guidance
- a relevant offence
- complaints or conduct matters arising from the same incident as one where conduct falling within the above criteria is alleged; or
- any conduct matter relating to a chief officer (or the Deputy Commissioner of the Metropolitan Police Service) and any complaint relating to a chief officer (or the Deputy Commissioner of the Metropolitan Police Service) where the appropriate authority is unable to satisfy itself, from the complaint alone, that the conduct complained of, if it were proved, would not justify the bringing of criminal or disciplinary proceedings

An appropriate authority must also refer complaints which arise from the same incident about which there is a complaint alleging that the conduct complained of resulted in death or serious injury.

Regulation 4 and 7, Police (Complaints and Misconduct) Regulations 2020

9.15 The term serious corruption refers to conduct that includes:

- any conduct that could fall within the definition of the statutory offence of 'corruption or other improper exercise of police powers and privileges'
- perverting the course of justice or other conduct that is likely to seriously harm the administration of justice, in particular the criminal justice system
- payments or other benefits or favours received in connection with the performance of duties amounting to an offence for which the individual concerned, if convicted, would be likely to receive a sentence of more than six months
- abuse of position for a sexual purpose or for the purpose of pursuing an improper emotional relationship
- corrupt controller, handler or covert human intelligence source (CHIS) relationships
- provision of confidential information in return for payment or other benefits or favours where the conduct could lead to a possible prosecution for an offence under Section 170 of the Data Protection Act 2018, or a more serious offence
- extraction and supply of seized controlled drugs, firearms or other material
- any other abuse of position, or
- attempts, conspiracies, incitements, assistance or encouragement to do any of the above

9.17 An abuse of position is any attempt by a person serving with the police, whether on or off-duty, to inappropriately or illegitimately take advantage of: their position as a person serving with the police the authority their position as a person serving with the police affords them, or any powers conferred on them by virtue of their position as a person serving with the police

9.39 A mandatory referral must be made without delay and in any case not later than the end of the day after the day it first becomes clear to the appropriate authority that it is a matter which must be referred.

Regulations 4, 7 and 9, Police (Complaints and Misconduct) Regulations 2020

9) FAILURE TO PROVIDE INVESTIGATION OUTCOME REPORT/S UNDER THE STATUTORY GUIDANCE AND GDPR (DATA PROTECTION ACT 2018) AND DUTY OF CANDOUR.

Grounds 1 to 8 highlight the legal failings of both Defendants. This particular ground (9) pertains only to the Chief Officer. It relates to Hampshire Police not responding to a more recent complaint about it not providing me with the outcome investigation report into my complaint about the false conduct assessment produced by the Professional Standards Department, which must exist given its stated position. Which is my complaint/s has already been investigated and is therefore repetitious and vexatious. Producing this report would corroborate his position and wholly refute mine. In fact I had offered to withdraw this legal challenge on more than one occasion if this information was provided to me. It is highly germane and substantive to these proceedings. Despite my numerous requests for this information first under the duty of candour and then by way of subject access request under the UK GDPR, all have been ignored and unlawfully circumvented by the Chief Officer. The ICO was

informed by Hampshire Constabulary they would not supply the information to me based on the exemption it would prejudice prospective legal proceedings (these now live JR proceedings). However as indicated my requests to his legal representatives under the duty of candour failed too. Both the IOPC and the ICO have written to Hampshire Police about this. However Hampshire Constabulary have still not provided the information to me for the Court's benefit here or admitted no such investigation has ever been undertaken, or even acknowledged the complaint. This can only be for fear divulging this truth in an attempt to try to impede the Courts ability to reach an informed proper decision based on the true facts. Admitting no such reports exist and Dorset Polices evidence has never been investigated would entirely repudiate Hampshire Constabularies legal position by exposing the truth. That is there has never really been any investigation into the misinformation as provided in the conduct assessment produced by its Professional Standards Department and the evidence substantiating it. And it is a lie to say it has.

Communicating the outcome (statutory guidance)

Complainants and interested persons

17.67 The appropriate authority must inform the complainant and/or interested person(s) of the outcome of the handling of a complaint, recordable conduct matter or DSI matter

They must do this in writing, within five working days of the outcome being determined

However, this is the responsibility of the local policing body if the matter is a complaint and the local policing body has chosen to take on responsibility for updating complainants and interested persons about complaints or, in a directed or independent investigation, it is the responsibility of the IOPC.

17.68 The complainant and/or interested person(s) must be provided with sufficient information to ensure that they are properly informed. This should include a written explanation of how the matter has been handled, the actions taken or to be taken, the findings and the outcome. Where appropriate, it should include the reasons for not taking certain actions where this was in line with reasonable or proportionate handling.

17.72 Whether the outcome is communicated by way of an investigation report or otherwise, it should be communicated in a clear and accessible way. It should:

- provide the recipient with sufficient information to properly understand and examine the handling of the matter, the decisions taken and the conclusions reached
- directly address the matters raised
- show that the objectives set – for example, in the terms of reference or during discussions with a complainant or interested person – have been met
- be written in plain language, free of technical jargon wherever possible
- be impartial and supported by evidence-based rationale
- provide a clear account of the information/evidence gathered and how it has been evaluated
- where appropriate, explain why information or action/lines of enquiry were not pursued
- not be defensive in tone
- acknowledge any concerns and harm caused, and the impact of this
- willingly demonstrate organisational accountability, where appropriate
- set out any learning opportunities for an individual or organisation, and how these will be acted on

Failings under the GDPR and Data Protection Act 2018. Of course the data/information would reference me personally. That part is my information. Anything that isn't could be redacted albeit that would conflict with the IOPC guidance as stipulated above. Notwithstanding they are still compelled under law to admit whether this information exists or not. They haven't because it would be admitting the truth. There has been no investigation into Dorset Police's evidence all.

DPA 2018 S(94) – Right of access



94 Right of access

- (1) An individual is entitled to obtain from a controller—
 - (a) confirmation as to whether or not personal data concerning the individual is being processed, and
 - (b) where that is the case—
 - (i) communication, in intelligible form, of the personal data of which that individual is the data subject, and
 - (ii) the information set out in subsection (2).

Information requested under the duty of candour

I once again request the Defendant's provide me with the investigation report/s that would corroborate the defence my complaint/s about the conduct assessment into the handling of the Arnewood School teacher sexual abuse case being false as having been investigated before to prove my complaint/s as repetitious and vexatious. I point out the conduct assessment itself is not a complaint as I was precluded from making one. However I am not precluded from complaining about being lied to by way of the assessment outcome sent to me contradicting the evidence I had supplied.

Now provide any investigation reports into my complaint/s about Hampshire Police's PSD producing a false conduct assessment report into its handling of the Tyrone Mark (Arnewood Teachers) child sexual abuse case. Or an admission the complaint or complaints relating to the same and Dorset Police's evidence has/have never been investigated. This information has been requested many times but withheld. It is substantive and pivotal and now must be produced under Hampshire Constabulary's and the IOPC's strict duty of candour.

If they do not exist (and they do not) the defence rests on a phantom.

Attached Exhibits

The eight challenged legal decisions Page

D1-D6) Challenged decisions (X6) – Keith Howell (KH)	31/1/2024	1
D7) Challenged decision (X1) – Esther Myers Robinson (EMR)	31/1/2024	38
D8) Unlawfully ignored complaint not answered contrary to IOPC statutory guidance and IOPC representations	No answer	54

Evidence

EX 01) The False conduct assessment produced by Hampshire PSD Into the handling of a child sexual abuse case	22/03/2018	62
EX 02) Dorset Police Officers evidence showing the report to be false	20/09/2022	70
EX 03) Dorset Police confirm the need for investigation	27/04/2023	72
EX 04) Diverted to Dorset police when they had not been sent the evidence		74
EX 05) Solicitor Tom Silson provides misinformation maintaining Dorset Police’s evidence has already been investigated (EX01,02,03)	02/07/2023	78
EX 06) The real substance of the complaint as explained to EMR	10/11/2023	82
EX 07) The real substance of the complaint as explained further to EMR	20/12/2023	85
EX 08) The real substance of the complaints as explained again to EMR	07/01/2024	90
EX 09) The real substance of the complaints as explained to KH	08/01/2024	105
EX 10) Where are the investigations reports?	30/10/2023	120
EX 11A) Request for explanations and reasons	31/01/2024	124
EX 11B) Wednesbury unreasonable “time travel” response KH	09/02/2024	132
EX 12) Ignored PSD complaint – investigation reports not sent	11/12/2023	138
EX13) Refusal to provide investigations report via multiple SAR’s Legal excuse JR pending		141
EX 15) Failings to provide substantive report/s under the duty of candour as well. So highly substantive evidence withheld.		170
EX 16) Multiple offers to withdraw if the reports were provided		182
EX 17) Permission previously granted on less evidence where the same defence arguments have already failed. Resulting consent order then thwarted (C0/2550/2018).		219
EX 18) Background and involvement of the Children’s Commissioner For England		246

Legal References

LR 01) Latest Statutory Guidance (2020)	264
LR 02) Previous Statutory Guidance (2015)	



Gwasanaeth Llysoedd a Thribiwnlysoedd EM

HM Courts & Tribunals Service

Swyddfa Llys Gweinyddol Cymru
Canolfan Llysoedd Sifil Caerdydd
2 Stryd y Parc
Caerdydd CF10 1ET

Administrative Court Office for Wales
Wales District Registry
2, Park Street,
Cardiff
CF10 1ET

T 02920376460

E cardiff@administrativecourtoffice.justice.gov.uk

<https://www.gov.uk/courts-tribunals/administrative-court>

VIA CE-File
[REDACTED]

Ein cyf/Our ref: **AC-2024-CDF-000059**

Tuesday, 16 April 2024

Annwyl Syr / Madam,
[REDACTED]
[REDACTED]
[REDACTED]

Dear Sir / Madam,
[REDACTED]
[REDACTED]
[REDACTED]

Ysgrifennaf i'ch hysbysu bod eich hawliad am Adolygiad Barnwrol wedi godi heddiw.

I write to inform you that your claim for Judicial Review was issued this day.

Yn awr mae angen i chi gyflwyno'r holl ddogfennau i'r Diffynnydd/Diffynyddion [a'r Parti/Partïon Cysylltiedig]. A fydddech gystal â nodi bod rhaid cyflwyno o fewn 7 diwrnod i ddyddiad y llythyr hwn, a rhaid darparu Tystysgrif Cyflwyno (Ffurflen N215) i'r Llys. Gall peidio â chydymffurfio â'r gofyniad hwn olygu y bydd y ffeil yn yr achos hwn yn cael ei chau.

It is now necessary for you to serve all documents on the Defendant/s [and Interested Party/ies]. Please note that service must be effected within 7 days of the date this letter, and a Certificate of Service (Form N215) lodged with the Court. Failure to comply with this requirement may result in the file in these proceedings being closed.

Pan fyddwch yn cyflwyno'r hawliad i'r Diffynnydd [ac unrhyw barti(ion) cysylltiedig], gwnewch yn siŵr eich bod yn amgáu copi o'r hysbysiad sydd ynghlwm.

When serving the claim on the Defendant [and any interested party(ies)], please ensure you enclose a copy of the attached notice.

Nodwch:

Er gwaethaf geiriad y Tystysgrif Cyflwyno (Ffurflen N215), nid oes yn rhaid cynnwys copi arall o'r holl bapurau yr ydych wedi'u cyflwyno i'r Diffynnydd a/neu unrhyw barti arall cysylltiedig gyda'ch tystysgrif gyflawn.

Please note:

Notwithstanding the wording of the Certificate of Service (Form N215), it is not necessary to enclose with your completed certificate a further copy of all the papers you have served on the Defendant and/or any interested party.

Nodwch hefyd ein Rhif Cyfeirnod ar gyfer yr achos ; y mae'n rhaid ei ddyfynnu pa bryd bynnag y byddwch yn cysylltu â'r Llys.

Please also note our Case Reference number which should be quoted whenever you communicate with the Court.

Defnyddiwch y ffurflen profforma amgaeedig i roi manylion y cwnsler yr ydych wedi'i gyfarwyddo i weithredu ar eich rhan, os nad ydych chi wedi gwneud hynny'n barod. **Os na ddarperir manylion y cwnsler ymhen 14 niwrnod, a bod wedyn angen rhestru'r achos ar gyfer gwrandawriad, bydd yr achos yn cael ei restru heb ystyried a yw'r cwnsler ar gael.**

Hoffem ddwyn eich sylw at Ran 54 y Rheolau Trefniadaeth Sifil a'r Cyfarwyddiadau Ymarfer sy'n dod gyda hwynt. Maent yn rhoi arweiniad ar faterion trefniadaethol yn y dyfodol. Sylwch fod y dogfennau a grybwyllwyd uchod ar gael o wefan Weinyddiaeth Cyfiawnder yn www.justice.gov.uk/about/hmcts/index.htm

Please use the accompanying proforma to supply details of counsel instructed on your behalf, if you have not already done so. **If counsel's details are not provided within 14 days, and the case is subsequently required to be listed for hearing, the case will be listed without counsel's availability being taken into consideration.**

Your attention is drawn to Part 54 of the Civil Procedure Rules and its accompanying Practice Directions, which give guidance on future procedural matters. Please be aware that the aforementioned can be obtained from the Ministry of Justice website at www.justice.gov.uk/about/hmcts/index.htm

*** GWYBODAETH BWYSIG
- DARLLENWCH OS GWELWCH YN
DDA ***

Arfer y Llys yw dinistrio **holl** ddogfennau copi ac **unrhyw** fwndeli yn syth ar ôl i'r achosion hyn ddod i ben, a chadw dogfennau gwreiddiol yn ffeil y Llys. **Byddem yn awgrymu'n gryf felly eich bod yn cadw copïau o unrhyw ddogfennau yr ydych chi'n eu cyflwyno i'r Llys.**

Os hoffech i'ch dogfennau copi neu'r bwndeli gael eu dychwelyd i chi, **rhaid i chi roi gwybod i'r Llys, ar bapur, cyn gynted ag y bo modd, a chyn diwedd yr achosion hyn**, gan nodi a ydych yn bwriadu dod i'r Llys i gasglu'r dogfennau, neu a fydddech yn hoffi i'r Llys eu dychwelyd drwy'r post neu drwy DX. Oherwydd costau, ni fydd y Llys yn dychwelyd dogfennau drwy Gludiant Cofnodedig na Phost Cofrestredig.

Os na chawn hysbysiad o'r fath, bydd y Llys yn cymryd nad ydych am gael eich dogfennau copi neu'r bwndeli yn ôl, a chânt eu dinistrio fel gwastraff cyfrinachol.

Sylwch, os byddwch yn gofyn am gopïau o'r dogfennau a gedwir yn ffeil y Llys,

*** IMPORTANT INFORMATION
- PLEASE READ ***

Please note that it is the Court's practice to destroy **all** copy documentation and **any** bundles immediately following the conclusion of these proceedings, and to retain original documentation on the Court file. **We therefore strongly advise you to keep copies of any documents that you submit to the Court.**

If you wish to have your copy documentation or bundles returned to you, **you must notify the Court, in writing, at your earliest convenience, and prior to the conclusion of these proceedings**, specifying whether you intend to come to the Court and collect your documentation, or whether you would like the Court to return it to you by post or by DX. Please note that for reasons of cost, the Court will not return documentation by Recorded Delivery or Registered post.

If we do not receive such notification, the Court will assume that you do not wish to have your copy documentation or bundles returned, and they will be destroyed as confidential waste.

Please be aware that if you request copies of documentation kept on the

codir ffi yn unol â pharagraff 4.1 (a) a (b)
Gorchymyn Ffioedd Achosion Sifil
(Diwygio), edrychwch ar Dabl Ffioedd
Swyddfa'r Llys Gweinyddol yn
[http://www.justice.gov.uk/courts/rcj-rolls-
building/administrative-court](http://www.justice.gov.uk/courts/rcj-rolls-building/administrative-court).

Court file, a fee is applicable under
paragraph 4.1 (a) and (b) of the Civil
Proceedings Fees (Amendment) Order,
please refer to the Administrative Court
Office Fees Table at
[http://www.justice.gov.uk/courts/rcj-rolls-
building/administrative-court](http://www.justice.gov.uk/courts/rcj-rolls-building/administrative-court).

Yn gywir/Yours faithfully,

Wales ACO
Ar ran Rheolwr y Llys/For Court Manager

**Rhif cyfeirnod yr achos: AC-2023-
CDF-001302**

**Case reference number: AC-2023-
CDF-001302**

**Par: The King (on the application of)
v**

Re: The King (on the application of) v

Enw'r cwnsler:

Name of counsel:

Siambrau:

Chambers:

Rhif ffôn y Siambrau:

Chambers telephone number:

Amcangyfrif amser (*os yn fwy nag 20
munud*):

Time estimate (*if longer than 20
minutes*):

Dychweler y ffurflen hon i:

Please return this slip to:

Swyddfa Llys Gweinyddol Cymru
Canolfan Llysoedd Sifil Caerdydd
2 Stryd y Parc
Caerdydd
CF10 1ET

Administrative Court Office for Wales
Wales District Registry
IIIIII lili IIIIII IIIII, J JJJJ JJJJJJ, Cardiff
CF10 1ET, Wales, LL. LLLLLL

DX LL. LLLLLL

DX LL. LLLLLL



Gwasanaeth Llysoedd a Thribiwnlysoedd EM

HM Courts & Tribunals Service

NODYN I'R DIFFYNNYDD A'R PARTI (PARTION) CYSYLLTIEDIG

NOTE TO DEFENDANT AND INTERESTED PARTY(IES)

Ein cyf/Our ref: AC-2023-CDF-001302

Swyddfa Llys Gweinyddol Cymru
Canolfan Llysoedd Sifil Caerdydd
2 Stryd y Parc
Caerdydd CF10 1ET

Administrative Court Office for Wales
Wales District Registry
IIIIII IIII IIIIII IIIII, J JJJJ JJJJJJ, Cardiff
CF10 1ET, Wales, LL. LLLLL

T 00000 000000, 00000 000000, 00000
000000

F [[Court Fax]]

E trhelpdesk1234@gmail.com

<https://www.gov.uk/courts-tribunals/administrative-court>

16 April 2024

Gellir cychwyn, gweinyddu a phenderfynu
ar hawliad sy'n dod gerbron y Llys
Gweinyddol yn un o'r lleoliadau isod:

A claim before the Administrative Court
may be started, administered and
determined at one of the following
venues:

Y Llysoedd Barn Brenhinol – Ystafell
C315, Y Llysoedd Barn Brenhinol, Strand,
Llundain, WC2A 2LL.

Royal Courts of Justice – Room C315,
Royal Courts of Justice, Strand, London,
WC2A 2LL;

Canolfan Llysoedd Sifil Birmingham -
Priory Courts, 33 Bull Street, Birmingham,
B4 6DS.

Birmingham Civil Justice Centre –
Priory Courts, 33 Bull Street, Birmingham,
B4 6DS;

Canolfan Llysoedd Sifil Caerdydd - 2
Stryd y Parc, Caerdydd, CF10 1ET

Cardiff Civil Justice Centre – 2 Park
Street, Cardiff, CF10 1ET;

Canolfan Llys Cyfun Leeds - 1 Oxford
Row, Leeds, LS1 3BG

Leeds Combined Court Centre – 1
Oxford Row, Leeds, LS1 3BG;

Canolfan Llysoedd Sifil Manceinion - 1
Bridge Street West, Manceinion, M60
9DJ.

Manchester Civil Justice Centre – 1
Bridge Street West, Manchester, M60
9DJ.

Mae'r mater hwn yn mynd rhagddo yng
Nghanolfan Llysoedd Sifil Caerdydd ar
hyn o bryd. Os ydych yn dymuno cael
cyfarwyddyd bod unrhyw wrandawiadau
cysylltiedig â'r mater hwn yn cael eu
gwrando yn un o'r lleoliadau eraill a nodir
uchod, dylech lenwi Ffurflen N464, sef
Cais am Gyfarwyddiadau ynghylch
lleoliad ar gyfer gweinyddu a
phenderfynu, ei darparu i'r Llys
Gweinyddol **yng Nghaerdydd** a'i
chyflwyno i bob parti sy'n gysylltiedig â'r
hawliad hwn, ymhen 21 niwrnod ar ôl i'r

This matter is currently proceeding at the
Cardiff Civil Justice Centre. Should you
wish to seek a direction that any hearings
in this matter be heard at one of the other
venues listed above, you should
complete, lodge with the Administrative
Court at **Cardiff** and serve on all parties
to this claim, a Form N464, Application for
Directions as to venue for administration
and determination, within 21 days of
service of the claim form upon you. There
is a fee payable for such application.

ffurflen hawlio gael ei chyflwyno i chi.
Rhaid talu ffi am gais o'r fath.

Mae Ffurflen N464 ar gael o Swyddfeydd
y Llys Gweinyddol neu gellir ei lawrlwytho
o wefan Weinyddiaeth Cyfiawnder yn
[www.justice.gov.uk/about/hmcts/
index.htm](http://www.justice.gov.uk/about/hmcts/index.htm)

Form N464 can be obtained from any of
the Administrative Court Offices or
downloaded from the Ministry of Justice
website at [www.justice.gov.uk/
about/hmcts/index.htm](http://www.justice.gov.uk/about/hmcts/index.htm).

Wales ACO Listing Clerk 1
Rheolwr Rhanbarthol/Regional Manager