

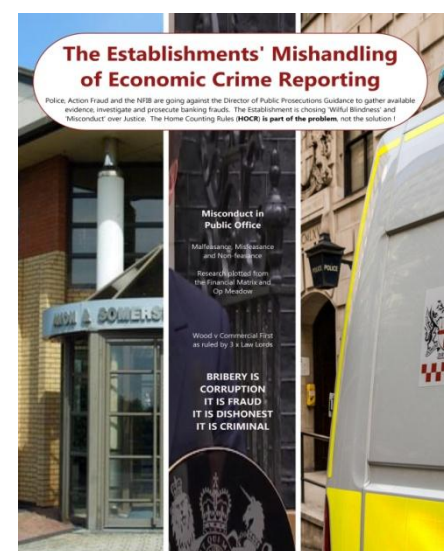
**The Establishments' Mishandling of Economic Crime Reporting** - there are two areas where "banking fraud reporting" is failing. Part by design and part by misconduct;

## 1. Home Office Counting Rules (HOCR)

- a. The **Home Office Counting Rules** (claim to) provide a national standard for the recording and counting of 'notifiable' offences recorded by police forces in England and Wales (known as 'recorded crime'). However, in respect of bank fraud on a bank's customers. **The NFIB crib sheets do NOT have a criteria** that box ticks a victims crime complaint at the NFIB (National Fraud Intelligence Bureau). \* On the contrary, **the HOCR allow fraud against a bank to be recorded!**
- b. The NFIB is positioned;
  - i. Above Action Fraud, and
  - ii. controlled by the City of London Police's Economic Crime Team for England & Wales
  - iii. Victims Crime Reports are restricted to just 2,500 characters (ie half an A4 page) and no prima facie evidence documents are allowed. HOCR also allow City of London Police to sanitise reporting. Basically too little intel (and in cases sanitised reports create too little to prompt instigation of criminal investigations. So victims get a letter that states no investigation will take place as he victims report does not meet their criteria !
- c. The HOCR also state there is to be a FCR (Force Crime Registrar) in each police force. In Avon & Somerset the Police Force Crime Registrar is an ex TLT Solicitors employee. TLT are predator lawyers for Lloyds Bank. Sophie Wadsworth ASP FCR in her role has had final say on whether a victims case is criminal, OR NOT !!!!! Thus 400+ cases in the last 6 years have been complained about being closed down to ASP PCC Office.

## 2. "Must" Guidance issued by the Director of Public Prosecutions is wilfully not being followed by Police through to Crown Prosecution Service advisories

- a. In a meeting 12 Aug 2022, myself, Martin Wickens, ex CID David Laity and Prof Nigel Harper met with officers from Avon & Somerset Police being; Assistant Chief Constable Will White, DS Rachel Shields and Dom Graham.
- b. It was established (and recorded) that both DS Shields and Dom Graham did not know of the "IVEY TEST" which is the standard accepted benchmark for "DISHONESTY/DECEIT"
- c. It was admitted that Avon & Somerset Police had not used "SME's" Subject Matter Experts (where Thames Valley on the Lloyds Bank HBoS Reading bust used 30-40 SME (experts) on technical aspects of the frauds
- d. The shocking part was that Dom Graham (who took over from Dr Kirstie Cogram, admitted that none of the 400+ cases in the last 6 years under him or Cogram complained about to ASP PCC Office had been taken by A&S Police to the CPS, **as is "MUST" required under section 37A of the Police and Criminal Evidence Act 1984** as set by the Director of Public Prosecutions in either Sir Keir Starmer QC time or Max Hill QC (current) time periods.
- e. Police should treat bank fraud allegations as Crime Reports and take initial evidence to the CPS for advice. They should then seek advice of Subject Matter Experts and gain next stage evidence for CPS assessment in view of the **FULL CODE TEST**.
- f. The **FULL CODE TEST** looks at i) **evidential** and ii) **public interest** then **FIVE Conditions** are considered ie; *are there reasonable grounds, further evidence, seriousness, bail/risk assessment, public interest*



3. With the above 2 points being abused, this is serious misconduct allowing administrative process abuse including Human Rights Abuse and thus systemic flaws are allowing criminal asset stripping to be industrialised to the sum of £billions. Senior police such as past CC Andy Marsh have also refused thousands of pages of victims prima facie evidence. We now have a full 450 page report that I can forward with flowcharts called: **The Establishments' Mishandling of Economic Crime Reporting** -
4. The Chair of the City of London Police Board and COLP Policies is James Thompson. He is also CEO of Gleeson Homes who have had £130m funding, mainly from Lloyds Bank in the last 10 years
5. The NCA was part designed by Simon Duckworth (predecessor to James Thompson). The NCA have ignored 703 alleged forged signatures in Lloyds Bank and RBS (etc) cases.
6. Both Security Ministers Damian Hinds MP and Stephen McPartland MP acknowledge that there are issues as to fraud and local policing investigation issues. They also recognise that the Home Secretary has backstop powers as found in the Policing Protocol Order 2011/ Statutory Instruments 2011, No.2744, whereby;
  - a. the Home Secretary ultimately could step in fast under said backstop which triggers off to the Police Act 1996, sections 40, 40A and s. 44
    - i. In particular under "Public Interest"
    - ii. the Police Act 1996, sections 40, 40A – relates to where the whole or part of a police force has failed and the Home Secretary has the power to intervene with remedy
    - iii. the Police Act 1996, section 44 – means the Home Secretary may insist the form in which a report is given by a forces Chief Constable and the way in which it is published as accountable to Parliament and public.



The Home Office Counting Rules are part of the problem, not the solution. ....

