13 Examples of other matters raised and complained about are:

(a) The travel restriction order placed on the Claimant's PNC in May 2022 about which he complained and which was the subject of an investigation by DPP professional standards department ("PSD") in August 2022;

(b) The Claimant's management under MAPPA (for which the National Probation Service are the lead agency);

(c) The labelling of the offences for which he was arrested (breach of the SCPO) as 'affray'.

14 The Claimant appears to think that he was subject to MAPPA due to the SCPO breach offences being categorised as 'affray' on police systems (see: §10 of the Claimant's bundle of evidence). DC Danielle Evans explains in her witness statement that he is mistaken, and that (i) 'affray' is simply how SCPO breaches are categorised on police systems; (ii) the decision to manage the Claimant pursuant to MAPPA was not a consequence of the labelling of the SCPO breach in police systems as 'affray' (see: §§9-10 of DC Evans' witness statement) and that it is the VISOR database which is used to manage offenders who are subject to SCPOs, but the Claimant is not and never has been categorised as a sex offender or violent offender (see: §§ 13-15 of DC Evans' statement).

26. The chronology of events indicate that he was previously breached upon his return from Belarus. The same would almost inevitably be true were the Claimant to return from wherever his is currently residing.

27. Whilst the 2022 Order remains in place, the Claimant is under obligations to report and comply with its terms, whether he be in the United Kingdom or elsewhere. Any non-compliance with its terms will result in him being in breach of the 2022 Order.

28. The Court should consider the Claimant's attempts to discharge the SCPO with some scepticism, particulars in light of the Claimant's own application stating "any application to make a new order should only be considered if the Claimant moves back to the UK jurisdiction within the next 5 years". The Court is invited to draw the inevitable inference that the only reason the Claimant seeks discharge of the Order is that he may travel freely to and from the UK without monitoring in place.

29. Even if there is some change of circumstances, in any event, the Claimant's foreign residency does not reduce his risk of harm, evidenced by the need to have it in place originally. The Claimant's conduct in respect of court orders is clearly indicative of wanting to frustrate effectiveness and/or avoid the need for compliance by any means.

30. It cannot have been the intention of Parliament to allow individuals subject to a "Serious Crime Prevention Order" to simply to move abroad, even to multiple countries, in order to frustrate the effectiveness of monitoring and/or prevention of crime, only to then allege a "change of circumstance" necessitating a complete review of the order with a view to a discharge of the