



GREATER MANCHESTER
POLICE

In the matter of the Police (Conduct) Regulations 2020
and in the matter of

Constable Christopher Nolan

Decision of Chief Resources Officer
Lee Rawlinson MBE

Preliminary matters

1. I have today conducted an accelerated misconduct hearing at GMP Force Headquarters and have given consideration to alleged breaches of the standards of professional behaviour as pertain to Constable Christopher Nolan.
2. PC Nolan was in attendance and was represented by Ryan Donaghue and accompanied by his Federation Representative Greg Wright and his Paralegal representative Amy Clark.
3. PC Nolan in his regulation 54 response has accepted that he has breached the standards of professional behaviour namely: authority, respect and courtesy; he did not accept he had breached standards for equality and diversity; and discreditable conduct, Constable Nolan did not accept that the circumstances amount to gross misconduct. He did accept his behaviour amounted to misconduct regarding authority respect and courtesy.
4. Whilst admitting he has used derogatory language, he maintains that he did so without the knowledge that the term used was offensive and he also states it is in regular use by other colleagues.
5. The officer's team made representations that the officer did not know or understand that the term [REDACTED] was offensive in the context of its reference to disability. That he had no intent to cause offence as he did not understand the word. He did however intend to mock colleagues in

that he was intending to refer to them as dogs or "lower down the ladder".

6. The AA ascertains that the term was not understood by the officer to be discriminatory or intended to be expressed as such so therefore his conduct cannot be discriminatory is entirely misconceived. They also raise concern that the officers suggestion that discriminatory terms can be said if they are not intended that way is of serious concern.
7. PC Nolan ascertains that he did not know the word and its true meaning. I find it difficult to believe given the wide extent of the use of the word over a number of years, as stated by the officer and his evidence, that it would not be apparent to PC Nolan of its true meaning. In his response he ascertains the word is in wide use so it is not likely that he has only heard once or just recently. PC Nolan did acknowledge he has been aware of the word since childhood as it was something he had heard in the playground so was not just used in a policing context. I personally did not believe that PC Nolan thought this pertained to being a general dogsbody or unspecialised. I also feel the public would agree that PC Nolan knew full well what the meaning of the term was.
8. I having heard the evidence have determined that the breaches, namely Authority, respect and courtesy, Equality and Diversity and Discreditable conduct are proven, and they do amount to Gross Misconduct.
9. PC Nolan admitted that he has breached the standards and he accepted his words were derogatory. I am satisfied he has discriminated and he intended to discriminate in the event.
10. The officer's actions were deliberate and intended. It is evidenced in statements that he made the comment [REDACTED] what are you going to do". This statement was repeated numerous times and was intended to insult and degrade officers, clearly demonstrating a lack of respect and courtesy to on duty colleagues attending a serious incident.
11. The behaviour was derogatory and discriminated. There were members of the public present who could have heard the language used. There was certainly the arrested member of the public but also in PC Webb's statement he mentions PC Nolan was potentially pulled back into the bar by his friend, so this was a public area. The fact that there is little harm evidenced is acknowledged but the potential for harm does remain high. The Ipsos document tells us the word [REDACTED] is highly offensive.
12. PC Nolan is a serving police officer who actively sought to insult and make demeaning comments of other police officers so I am satisfied that his conduct also breaches the standards of behaviour regarding discreditable conduct as it is not the behaviour that the public would

expect of their police officers.

Outcome

13. In considering the appropriate disciplinary action to be imposed, I received written and verbal submissions from the Appropriate Authority that the appropriate disciplinary outcome, in this matter is dismissal without notice and being placed on the College of Policing barred list.
14. At the forefront of my mind has been the purpose of misconduct proceedings, these are expressly set out in the College of Policing's guidance.
15. In determining the appropriate disciplinary action, I have had regard to the relevant provisions of the College of Policing's Guidance on Outcomes in Misconduct Proceedings. I do recognise that it does not automatically follow that where breaches of the code of conduct are found to be so serious as to justify dismissal, that dismissal can be the only sanction implied. Nevertheless, it remains very powerfully the case that the principal objective in the conduct of these hearings must be to preserve public confidence in the police service regardless.
16. The officer's representative rightly points out that whilst the officer is currently under a final written warning the severity assessment for this case was undertaken in August 2024 the written warning was issued December 2024 therefore it is a viable option for a final written warning can be made.
17. My approach has been to "adopt" the "3 stage approach" referred to in the College of Policing's Guidance
18. I have assessed the seriousness of the conduct. It is accepted that the officer used the phrase [REDACTED], what are you going to do" and that he made the statements repeatedly.
19. I have noted PC Nolan deeply regrets using the term.
20. The officers representative repeated the demonstration of remorse in this hearing.
21. In terms of culpability the officers actions were intentional and

deliberate and repeated at the time of the event. The actions discriminated against a protected characteristic namely disability. Para 4.54 of the college of policing guidance states that discrimination towards persons on the basis of any protected characteristics is never acceptable and always serious. The language was directed at colleagues during a serious incident and paragraph 4.58 states that where unconscious discrimination exists as claimed by the officer this can also be serious and have significant impact on public confidence

22. In terms of Harm there is reputational harm to policing in that the public would not expect police officers to use such language or behave in such a manner as highlighted in para 4.66. There is as highlighted by the Appropriate Authority and para 4.70 national concern regarding discrimination in policing. The officers representative suggests there is no quantifiable harm in this case and it should sit at the lower end of the spectrum. I acknowledge that this may be true but the risk of harm was evident. This incident occurred outside a bar in the early hours of the morning, and PC Wilkinson's statement specifically refers to PC Nolan's comments being inappropriate due to "the amount of public that were out at the time". There was clearly the potential for PC Nolan's comments to be heard by a wider audience and it may only be by good fortune it wasn't heard wider.
23. In terms of aggravating factors the AA demonstrates that PC Nolan has history of this behaviour and is currently holding a final written warning which expires in 2026 and was subject to a previous written warning for similar behaviour of making discriminatory comments.
24. With regards to mitigating factors the officers representative makes reference to multiple and wide spread use of the term and that it cannot be the case that everyone who has used this term would be disciplined. I would like to be very clear on this point. There is no place for this type of language or behaviour in policing. Greater Manchester Police takes a zero tolerance stance on all forms of discrimination and if other officers are using this type of language I would expect them to face misconduct proceedings. If others are using derogatory language and behaviour it does not give anyone licence to repeat it and use it.
25. I have received and taken into account PC Nolan's personal record. There is, however, nothing in there which would mitigate the findings I have made today; rather, he has previously been given two written warnings for using discriminatory language in the past. It is of deep concern that in a 6 year career with GMP, this officer has been found on three separate occasions to have committed gross misconduct by

using discriminatory and derogatory language. which only increases my concerns that, if he were to continue in the police service, this type of behaviour is likely to recur and could have even more serious or significant consequences.

26. I have accordingly determined that PC Nolan should be dismissed from the service with immediate effect.
27. I order that Mr Nolans name be added to the College of Policing's Barred List.
28. This concludes today's hearing.

A handwritten signature in black ink, appearing to read 'Lee Rawlinson', written in a cursive style.

Lee Rawlinson MBE
Chief Resources Officer

14th August 2025

