



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

**Former Police Sergeant Keir**

**Decision of Chief Resources Officer Lee Rawlinson MBE**

**Preliminary matters**

1. I have today conducted an accelerated misconduct hearing at Unit A, GMP Force Headquarters, and have given consideration to various breaches of the standards of professional behaviour as pertain to former Police Sergeant Keir.
2. The Appropriate Authority was represented by Richard Black. Former sergeant Keir has chosen not to attend this hearing and has indeed resigned from Greater Manchester Police as of yesterday the third of June 2026. Mr Keir is aware that this hearing is taking place and has had opportunity to attend so I am satisfied it is appropriate for me to continue in his absence.
3. Mr Keir has in his regulation 54 response indicated he accepts he has breached the standards of professional behaviour, in particular the standards relating to Discreditable Conduct and Orders and Instructions. Mr Keir has further accepted in his regulation 54 response that his alleged behaviour amounts to gross misconduct.
4. The hearing relates to the allegation that former Sergeant Keir, between 7<sup>th</sup> February 2019 and August 27<sup>th</sup> 2024, whilst off duty, used his GMP issued mobile phone to engage with sex workers 142 times. The numbers attributed to 16 adult sex workers via voice call and SMS for non-policing purposes.
5. I, having considered the evidence, have determined it is appropriate for me to hear this case in that there are sufficient grounds as evidenced in the bundle that former Sergeant Keir has breached the standards for professional behaviour in that he

repeatedly and, over a long period of time, not only contacted sex workers but also used Greater Manchester Police equipment to engage with sex workers whilst he was off duty.

6. I also conclude that the breaches alleged are proven and that they do indeed amount to gross misconduct on the basis that the breaches are of a serious nature and are a breach of the "Guidance" on the use of commercial sex worker services. I refer to the NPCC Sex Work National Police Guidance document version 2 February 2024, which clearly sets out that the use of sex workers is incompatible with the role of a police officer or police staff member. I refer also to the Chief Constable's Orders as published on 3<sup>rd</sup> July 2023 which relates to the use of sex workers.
7. Further to this it is clear that this was also a breach of instructions on use of electronic devices including mobile phones as presented by the Appropriate Authority.
8. The appropriate Authority also sufficiently demonstrated that he should have known, from his knowledge of policing, that personal contact with sex workers at all is discreditable for a police officer due to the vulnerable position they hold and potential links with wider criminality.
9. In coming to a determination as to the most appropriate outcome, I have considered the submissions of the appropriate authority as contained within the bundle of evidence submitted to me prior to this hearing along with verbal submissions by the representative of the appropriate authority.
10. Mr Keir was not in attendance although was aware he could be, and there was no representation from the police federation or other representative on his behalf. Mr Keir had responded to the allegations in his regulation 54 response where he only states he accepts he has breached the standards alleged and that he accepts that these breaches amount to gross misconduct. He gives no further mitigation, evidence or explanation.
11. In determining the appropriate outcome, I have had regard to the relevant provisions of the College of Policing's guidance on outcomes in misconduct hearings. 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.
12. In assessing the seriousness of the misconduct found, it is a matter of fact that Mr Keir's telephone records show repeated and regularly contact with known sex workers from his GMP issue mobile phone. It was admitted by Mr Keir in his regulation 54 response that he had used his GMP issued mobile phone to contact adult sex workers.

13. I received written and verbal submissions from the Appropriate Authority that the appropriate disciplinary outcome in this case, had the officer not resigned would be dismissal without notice and the placing of his details onto the College of Policing's Barred List.
14. 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.
15. What is always paramount to me is the purpose of misconduct proceedings – these are expressly set out in the College of Policing's Guidance namely;
  1. To maintain public confidence in, and the reputation of the police service
  2. To uphold high standards in policing and deter misconduct
  3. To protect the public
16. My approach has been to "adopt" the "3 stage approach" also referred to in the College of Policing's Guidance. Namely to assess the seriousness of the misconduct, to keep in mind the purpose of imposing sanctions and to choose the sanction that most appropriately fulfils that purpose bearing in mind the seriousness of the conduct in question.
17. Mr Keirs actions inevitably bring the profession into disrepute and undoubtedly damages the trust that the public have a right to expect of their police officers. Police officers are expected to behave in a manner that does not discredit the police service or undermine public confidence whether they are on or off duty.
18. In assessing the seriousness of the conduct, I consider that Mr Keirs culpability must be regarded as very high as the more blameworthy the conduct the more severe the likely outcome as highlighted in paragraph 4.9 of the guidance. His actions were intentional, deliberate and carried out in the full knowledge that his conduct was in breach of the Chief Constable's Orders and national Guidance from the NPCC. It is also clear that former PS Keir has breached internal policies and guidance on use of electronic devices as mentioned. His actions were patently not appropriate and not of the standards expected from a police officer with long service and the rank of sergeant.
19. Paragraph 4.40 of the guidance tells us that misconduct involving violence, intimidation or sexual impropriety is serious and can significantly undermine public trust in the profession. This case is a clear example of sexual impropriety. Paragraph 4.43 further reminds us that the presence of any of these factors [Sexual misconduct] is likely to increase the seriousness of the misconduct.
20. With regards to Harm. The Appropriate Authority has highlighted the potential significant impact on the harm to the reputation of policing as demonstrated in paragraph 4.66 of the guidance.

21. Police officers are expected to act in a manner that does not discredit the police service or undermine public confidence in it, whether on or off duty. Misuse of police equipment and failing to adhere to GMP policies and guidance and by engaging with adult sex workers against force policy as per the chief constables orders of 2023 he breached this standard and by engaging with sex workers he undermines public confidence in himself and policing in general. He rightfully should have known that sex workers are often vulnerable members of the public and may have links to organised crime. Sex workers can be victims of human trafficking, and he placed himself at risk of corruption by engaging with sex workers and this compromised his position as a police officer.
22. 4.69 of the guidance reminds us to consider how such behaviour would be or has been, perceived by the public to be relevant whether or not the behaviour was known about at the time. And 4.74 tells us that where gross misconduct has been found and the behaviour has caused or could have caused serious harm to individuals the community and/or public confidence in the police service, dismissal is likely to follow. A factor of greatest importance is the impact of the misconduct on the standing and reputation of the profession as a whole.
23. Mr Keir also failed to follow orders and instructions in that his behaviour is not compliant with NPCC Sex Work National Police Guidance, (issued February 2024) which clearly set out that the use of sex workers is incompatible with the role of a police officer or police staff member. In addition, his behaviour has breached Chief Constable's Orders and placed him in breach of GMP policies in respect of the appropriate use of electronic communications and information systems and the appropriate use of information and technology. Therefore, I find that his actions demonstrate he has failed to abide by regulations, force policies and lawful orders.
24. With regard to the aggravating factors set out in the College of Policing's Guidance, and with reference to Paragraph 4.76 of the guidance the misconduct had malign intent (sexual gratification), was regular, repeated and sustained over a substantial period of time, the behaviour continued after the officer realised or should have realised that it was improper, it was, as described, a serious deviation from instruction. There is also significant national concern over sexual misconduct of police officers at present.
25. With regard to personal mitigation and mitigating circumstances, of those set out in the College of Policing's Guidance, I have taken into account Mr Keirs record of service and the early admission in this case. I have also considered the remorse shown in recent correspondence. Mr Keir has chosen not to engage with this process, and I am therefore unable to consider any further mitigations from him in the hearing.
26. I reiterate the point that the core purpose of these proceedings is to sustain public confidence in the police. As articulated above, there is no doubt that the facts of this case have the obvious potential to seriously and substantially diminish public

confidence. In conclusion, I consider that the level of seriousness in this case is very high.

27. Greater Manchester Police expects the highest standards of professional behaviour from its officers and staff both on and off duty. The behaviour of Mr Keir was totally unacceptable and not befitting of a police officer.
28. I am reminded that the presumption in cases of gross misconduct is dismissal and in this case I have heard no appropriate evidence to suggest deviation from that presumption. Had Mr Keir not resigned, I would have dismissed him from the service with immediate effect.
29. I also order that Mr Keir's name be added to the College of Policing's Barred List.
30. This concludes today's hearing.

4<sup>th</sup> June 2026

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

Lee Rawlinson MBE  
Chief Resources Officer