

IN THE MATTER OF MISCONDUCT PROCEEDINGS
THE POLICE (CONDUCT) REGULATIONS 2020
BETWEEN:

THE CHIEF CONSTABLE OF GREATER MANCHESTER POLICE
Appropriate Authority

And

POLICE SERGEANT NATALIE DOLAN
The Officer

HEARING ON THE 27 – 30 APRIL 2026
CHAIR'S REPORT GIVING REASONS AND FINDINGS

Summary of the case

1. At the misconduct hearing on 27 – 30 April 2026, the panel considered allegations concerning inappropriate and offensive messaging, the sharing of confidential information, and the failure to appropriately manage and report a conflict of interest.
2. The Panel found that the officer breached the Standards of Professional Behaviour relating to Integrity, Confidentiality, Authority, Respect and Courtesy, Equality and Diversity, Discreditable Conduct, and Challenging and Reporting Improper Conduct.
3. The Panel concluded that the breaches amounted to Gross Misconduct.
4. Following consideration of outcome and the College of Policing Guidance on Outcomes in Police Misconduct Proceedings, the Panel determined that the appropriate outcome was dismissal without notice and directed that the officer's name be placed upon the College of Policing Barred List.

References and abbreviations

5. In this report:
 - a) 'the 2020 Regulations' means the Police (Conduct) Regulations 2020. Reference to a regulation is, unless otherwise stated, to a regulation in the Police (Conduct) Regulations 2020.
 - b) 'the 2020 Home Office Guidance' and 'the Home Office Guidance' refers to the Home Office Guidance *Conduct, Efficiency and Effectiveness: Statutory Guidance on professional Standards, performance and Integrity in Policing* (issued under section 87 and 87A of the Police Act 1996) published on 5 February 2020.

- c) 'the College of Policing outcomes guidance' and 'the outcomes guidance' refers to the College of Policing *Guidance on outcomes in police misconduct proceedings* (issued under section 87 the Police Act 1996) published on 17 August 2022 and updated (by having paragraph numbers added) in March 2023.

6. In this report the following abbreviations/terms may be used:

- a) The Officer = PS Natalie Dolan
- b) AA = Appropriate Authority
- c) HOG = Home Office Guidance
- d) IO = Investigating Officer
- e) The Chair = CRO Lee Rawlinson MBE
- f) IPM = Independent Panel Member
- g) LQP = Legally Qualified Person
- h) PC = Police Constable
- i) PS = Police Sergeant
- j) PSD = Professional Standards Directorate
- k) PNB = Pocket Notebook

Status of this report

7. This report has been prepared by the Legally Qualified Person pursuant to Regulation 43 (1B) of the Police (Conduct) Regulations 2020, following delegation by the Chair.

Regulation 43 (1C) provides for submission of the final report to the Appropriate Authority within 10 working days of the conclusion of the proceedings.

Regulation 43 further requires the report to set out the following:

- (a) *The findings of the person or persons conducting the misconduct proceedings,*
- (b) *The reason for that finding,*
- (c) *Any disciplinary action imposed, whether disciplinary action for gross misconduct was imposed,*
- (d) *Any direction that the matter shall be dealt with under the reflective practice review process.*

8. This document is the 'report' submitted 'to the appropriate authority' pursuant to regulation 43 (1) of the Police (Conduct) Regulations 2020 and it is the Chair's report.

Parties, representatives, panel members and other attendees.

9. The hearing was held at Greater Manchester Police Force Headquarters, Unit A in person.
10. PS Natalie Dolan attended the misconduct hearing, and she was represented by Ms. Jennifer Ferrario, Counsel.

11. The AA was the Chief Constable of Greater Manchester Police who was represented during the proceedings by Mr. Stephen Morely, Counsel.
12. The Chair of the misconduct panel was Lee Rawlinson and was supported by independent panel members Susan Knowles and Jan Lamping.
13. The LQP was Ms Emma Hutchinson, Solicitor-Advocate
14. DC Carrie Holder Clancy attended the hearing.
15. There were observers present during parts of the hearing, including members of the press and members of the public.

Anonymity and Publicity

16. Prior to the misconduct hearing, directions were made concerning reporting restrictions and the identification of certain individuals connected to the proceedings.
17. The proceedings originally involved two officers. Immediately prior to the commencement of the substantive hearing, the proceedings involving the two officers were separated and it was understood that proceedings concerning the second officer would be determined separately at a later date.
18. The directions provided that there should be no reporting of the second officer's first name
19. The directions further provided that there should be no reporting of alleged misconduct concerning the second officer beyond the messages which formed part of these proceedings.
20. The Panel further directed that whilst it was appropriate for the officers subject to proceedings to be named, it was neither necessary nor appropriate for other individuals connected to the proceedings to be identified within publications relating to the hearing.
21. Members of the press and the public attended parts of the hearing and were made aware of the reporting restrictions and directions in place.
22. The misconduct hearing proceeded on the understanding that reference during the public hearing to a document, or to a page within a document, would not automatically result in that document or page becoming public.

Background to the matter

23. During a criminal investigation, inappropriate messages were found on PC Jones mobile telephone that had been exchanged between himself and PS Dolan.
24. At the time the messages were exchanged PC Jones was a student officer undergoing training. PS Dolan was a Police Sergeant in the training unit;
25. Following discovery of the messages, the matter was referred to the Independent Office for Police Conduct ("IOPC"). Both officers were thereafter investigated by the IOPC in 2023, and a final report was concluded on 17 January 2024.
26. The sending of the messages is not denied. Partial admissions have been made and breaches of certain Standards of Professional Behaviour were admitted.

Standards of Professional Behaviour

27. The Standards of Professional Behaviour are contained in Schedule 2 of The Police (Conduct) Regulations 2020.
 - Honesty and Integrity
"Police officers are honest, act with integrity and do not compromise or abuse their position."
 - Confidentiality
"Police officers treat information with respect and access or disclose it only in the proper course of police duties."
 - Authority, Respect and Courtesy
"Police officers act with self-control and tolerance, treating members of the public and colleagues with respect and courtesy. Police officers do not abuse their powers or authority and respect the rights of all individuals."
 - Equality and Diversity
"Police officers act with fairness and impartiality. They do not discriminate unlawfully or unfairly."
 - Discreditable Conduct
"Police officers behave in a manner which does not discredit the police service or undermine public confidence in it, whether on or off duty. Police officers report any action taken against them for a criminal offence, any conditions imposed on them by a court or the receipt of any penalty notice."

- Challenging and Reporting Improper Conduct
“Police officers report, challenge or take action against the conduct of colleagues which has fallen below the Standards of Professional Behaviour.”

The Allegations and Response

28. Allegations of Fact

PARTICULARS

- This is a case concerning matters as particularised in the regulation 30 notice served upon PS Dolan and repeated below:
- “At all material times you were a police sergeant in the Greater Manchester Police, in a position of responsibility at Sedgley Park as part of the training team.
- Between approximately 27th April 2021 and 28 July 2022 you exchanged a series of WhatsApp messages with PC Jones.
- ”
- Allegation One** – “Examination of the WhatsApp messages exchanged between yourself, and PC Jones has revealed that you exchanged messages with PC Jones messages that were:
 - Racist
 - Sexist
 - Mocking of the disabled
 - Disparaging and offensive about colleagues; and/or
 - Mocking student officers

A schedule of the inappropriate messages sent by you to PC Jones was provided marked “Schedule A”.

- “Sending those inappropriate messages breached the following Standards of Professional Behaviour:
 - Honesty & Integrity, because police officers are expected to act with integrity and not engage in discriminatory or offensive messaging.
 - Authority, Respect and Courtesy, because police officers are expected to treat colleagues with courtesy and respect.
 - Equality & Diversity, because police officers are expected to act with fairness and impartiality and not discriminate; and

- d. Discreditable Conduct, because exchanging offensive text messages was likely to bring discredit upon the police service.”
- g) “A schedule of the inappropriate messages sent by PC Jones was provided marked “Schedule B.”
- h) “Failing to challenge PC Jones’s inappropriate messages was a breach of the Challenging and Reporting Improper Conduct standard because police officers are expected to challenge the poor behaviour of colleagues.”
- i) **“Allegation Two** – Examination of the WhatsApp messages exchanged between you and PC Jones has revealed that you shared confidential information with PC Jones about his colleagues:
 - a. On 14th July 2021 you indicated that you would show PC Jones a photograph of students who were going to be referred to Professional Standards for having a party during Covid “when you come round”.
 - b. On 27th July 2021 you shared information with PC Jones about his posting and told him not to share the information with others.
 - c. On 15th September 2021 you told PC Jones that some of his colleagues had failed an exam.
 - d. On 2nd November 2021 you told PC Jones that he had passed an exam but told him not to tell anyone or you would be in trouble. On the same date you gave PC Jones the names of three colleagues who had failed the exam.
 - e. On 18th November 2021 you informed PC Jones that one of his colleagues had been reported to ‘the boss’ for a ‘stage 1 and back class’.
 - f. On 29th November 2021 you told PC Jones that a colleague was about to receive a Regulation 13 ‘invite’ which was ‘stage 1 of 3 for dismissal’.
 - g. On 20th December 2021 you told PC Jones that you had prepared Regulation 13 papers for one of his colleagues. On the same date you told PC Jones that another of his colleagues had received ‘bad feedback’; and
 - h. When PC Jones expressed concern about being on the same team as a female colleague in March 2022, you sent PC Jones a message stating: “Boss is sorting that she gets put on another team for you”.
- j) “You were in a position of trust as a sergeant on the training team and privy to confidential information about student officers. Disclosing information about other officers to PC Jones breached the following Standards of Professional behaviour:

- a. Confidentiality, because police officers are expected to treat sensitive information with care and only disclose it to others for proper policing purposes.
 - b. Authority, Respect & Courtesy, because police officers are expected to treat colleagues with courtesy and respect; and
 - c. Discreditable Conduct, because disclosing information to PC Jones about his colleagues was likely to bring discredit upon the police service."
- k) **Allegation Three** – "Around the time PC Jones joined Greater Manchester Police you properly disclosed that you had a personal connection to him . You made this disclosure because you were aware of the potential conflict of interest that could arise because of your role as a police sergeant in the training department that would be responsible for training PC Jones.
- l) Once PC Jones had commenced his training and was a student officer, a conflict of interest did actually arise because:
- a. You were exchanging inappropriate text messages with a student officer.
 - b. You failed to challenge the inappropriate text messages you received from a student officer; and
 - c. You disclosed confidential information about colleagues to a student officer
- m) As a result, a clear conflict of interest in fact developed.
- n) You failed to report this conflict of interest to a supervisor or otherwise make arrangements to remove yourself from the situation and accordingly breached the 'Discreditable Conduct' standard of the Standards of Professional Behaviour because the conflict of interest that developed between yourself and PC Jones was likely to bring discredit upon the police service."
- o) Taken together your breaches of the Standards of Professional Behaviour were so serious that they amount to gross misconduct."

Response

29. PS Dolan provided a regulation 31 response in which she made partial admissions to breaching certain Standards of Professional Behaviour and denied that her behaviour amounted to gross misconduct.

Interview under caution

- a) PS Dolan was interviewed by the IOPC on 18th May 2023 and at the start of the interview read out a prepared statement. She then addressed the text messages, denying that she had been discriminatory or grossly offensive in the messages.
- b) PS Dolan provided written answers to questions from the IOPC on 30th October 2023, in this she denied passing any confidential information to PC Jones and explained that she did not share any confidential exam results with him.

Response to the regulation 30 allegation

- c) PS Dolan completed a Regulation 31 response dated 28 May 2025. Her response was in accordance with her interview and written answers to questions.
- d) PS Dolan completed a Regulation 31 response dated 28 May 2025.
- e) PS Dolan's response at page 292, paragraph 10, in summary:

Allegation 1

- a. 24 May 2021, Page 39, Admitted as disparaging & offensive.
- b. 23 June 2021, Page 39, Admitted as disparaging & offensive.
- c. 23 June 2021, Page 38 (in green) Admitted as disparaging & offensive. Racist conduct denied.
- d. 23 June 2021, Page 73, Admitted as disparaging & offensive.
- e. 24 June 2021, Page 40, Denied.
- f. 2 August 2021, Page 40, Admitted as disparaging & offensive. Denied that the messages were sexist.
- g. 2 August 2021, Page 40, Admitted as disparaging & offensive.
- h. 4 August 2021, Page 75, Admitted as disparaging & offensive.
- i. 20 August 2021, Page 38, Admitted that PS Dolan mocked student officers. Denied that she mocked the disabled or was disparaging & offensive about colleagues.
- j. 15 September 2021, Page 41, Admitted as disparaging & offensive. Denied that it was sexist.

- k. 17 September 2021, Page 41 & 42, Admitted as disparaging & offensive. Denied mocking.
- l. 30 September 2021, Page 42, Admitted as disparaging & offensive. Denied that the comment was racist or mocking of student officers.
- m. 31 October 2021, Page 43, Admitted as disparaging & offensive.
- n. 1 November 2021, Page 44, The word "twat" as alleged does not appear in any of the messages, sent by PS Dolan on this date. The word 'tosser' as alleged has never been alleged and PS Dolan has not been asked to account for it.
- o. 15 November 2021, Page 44, Admitted as disparaging & offensive. Denied that it was mocking of the disabled.
- p. 16 November 2021, Page 45, Admitted as disparaging & offensive.
- q. 18 November 2021, Page 46, ('shitbag'). Admitted as disparaging & offensive.
- r. 18 November 2021, Page 46, ('twat'). Admitted as disparaging & offensive.
- s. 18 November 2021, Page 46, ('muppets'). Admitted as disparaging & offensive. Denied that it was mocking of student officers.
- t. 1 November 2021, Page 44, 1 November 2021, Page 44, 24 May 2021, Admitted as disparaging & offensive.
- u. 19 November 2021, Page 47, Denied.
- v. 29 November 2021, Page 52, Admitted as disparaging & offensive about colleagues but on the basis that the word that she meant to write was 'slacker'. It is denied that the word used was mocking of the disabled or mocking of student officers (because there was no intention to use that word and 'slacker' would not have been mocking or related to a disability).
- w. 15 December 2021, Page 53, Admitted as disparaging & offensive.
- x. 23 December 2021, Page 54, ('muppets') Admitted as disparaging & offensive. Denied that it was mocking of student officers.
- y. 23 December 2021, Page 56, ('little cunt') Admitted as disparaging & offensive.
- z. 27 January 2022, Page 57, Admitted as disparaging & offensive.

- aa. 21 February 2022, Page 38 Admitted as disparaging & offensive. Denied that it was racist.
- bb. In relation to Allegation One, paragraph 5 of the Regulation 30 notice, PS Dolan's position is that it is entirely misconceived to allege that PS Dolan should have challenged J's messages (Schedule B) in a situation where she had been exchanging inappropriate messages with him over a period of time.
- cc. PS Dolan regarded it as humour in a private conversation with a colleague whom at the time, (pages 122 – 123 of the bundle). She regrets her actions.
- dd. During her interview with the IOPC and whilst giving her evidence, PS Dolan explained her understanding of the following messages that were sent to her by Mr Jones,

Schedule B

- ee. 'I think no more' exchange – page 38. PS Dolan's understands this to be related to the quality of policing.
- ff. 'How ironic is it that an Italian has won student of the intake & FFS' exchange – page 38. PS Dolan's explanation is that she has worked with the Sergeant for four years, he's Italian but born in Crumpsall and she receives humour back from him having come from Essex and working in the Met. The comment is in no way intended to be grossly offensive towards the Italian nationality.
- gg. PS Dolan denies sharing confidential information with PC Jones save for the information that was shared on 18 & 29 November 2021

Allegation 2

- hh. 14 July 2021: Pages 61 & 62. PS Dolan's position is that this related to a Facebook post and was information in the public domain. There is no evidence of a disclosure of confidential information, it was a humorous conversation with no reference to names.
- ii. It is denied that this was confidential information because Mr Jones could have walked into any tutor unit and seen for himself the information that was exchanged. The information related to him and no-one else.
- jj. 15 September 2021: Page 65. No information was shared.
- kk. 2 November 2021: Page 68. Mr Jones told PS Dolan the names of police officer students that failed an exam. PS Dolan recognises that she accepted sharing confidential information in her regulation 31 response (at page 300 part (d)).

- ll. 18 November 2021: Page 69: Admitted (during her evidence). PC Dolan accepts that whilst she did not share any names with Mr Jones, she shared details of a process that strayed into confidential information.
- mm. 29 November 2021: Page 49. Admitted. PS Dolan accepts that when she sent a message to former PC Jones about a colleague whom she had been told was to receive misconduct papers, that this was a disclosure of confidential information. The information had been 'common knowledge' at the time however PS Dolan recognises with hindsight that this had not removed the confidential nature of the information.
- nn. 20 December 2021: Page 70. PS Dolan's position is that the individual did not receive a regulation 13 notice. Notices were being served whilst the student officers were on Officer Safety Training (OST). CN had been present at the time. PS Dolan was not asked about this allegation during her interview and the IOPC did not conduct any enquiries about it hence there is no evidence in the bundle to support the AA's position that confidential information was shared.
- oo. 16 March 2022: Page 70. PS Dolan's position is that the context to this message was that Mr Jones's former girlfriend, , had been placed on the same team as Mr Jones. PS Dolan spoke to her Inspector about that because Mr Jones asked her to and in the message, she confirmed that her Inspector intended to separate them. It was not confidential information because Mr Jones had asked PS Dolan to speak to her Inspector.
- pp. PS Dolan has previously set out her response to sharing confidential information as follows:
 - 1. Pages 127 – 141.
 - 2. Pages 162 – 163.
 - 3. Pages 175 – 176 (relates to the message of the 2 November 2021).
 - 4. Pages 178 – 179.
 - 5. Regulation 31 response from page 299, paragraph 16, sets out her response.

Documents before the panel

- 30. Prior to the hearing, the panel received a hearing bundle from the AA, comprising of 321 pages.
- 31. The hearing bundle was provided to PS Dolan prior to the misconduct hearing.
- 32. Prior to the hearing, the panel received a further hearing bundle on behalf of PS Dolan, comprising of 305 pages.

33. Prior to the hearing, the panel received an opening note from the AA prepared by Mr Morley.

34. The panel also received written submission on behalf of PS Dolan for Stage 1.

In the Hearing

35. The Appropriate Authority read the Regulation 30 notice into the record.

36. Counsel on behalf of PS Dolan read the officer's response's and confirmed the admissions and denials set out within her Regulation 31 response.

37. The Appropriate Authority opened the case and referred the Panel to the written opening note and documentary evidence relied upon.

38. PS Dolan gave oral evidence during the hearing and was questioned by her representative, the Appropriate Authority and the Panel.

39. The Panel also heard submissions from both parties in relations to the factual allegations, the alleged breaches of the Standards of Professional Behaviour, misconduct and gross misconduct, and outcome.

Legal Advice

40. The panel received legal advice from the Legally Qualified Person (LQP) throughout the proceedings on procedural and legal issues arising during the hearing.

41. Written legal advice was provided to the parties during the proceedings in relation to matters including the approach to assessing evidence, the Standards of Professional behaviour, Misconduct and Gross Misconduct and Outcome.

42. The Panel accepted the legal advice provided.

43. Copies of the written legal advice provided during the proceedings are appended to this report.

Role of the panel

44. The role of the panel has four steps, which the panel approached in two stages:

Stage One

45. First, determining the facts based upon what is admitted by the officer or proven on the balance of probabilities.

46. Second, determining whether, on the basis of those facts the officer has breached the Standards of Professional Behaviour alleged by the Appropriate Authority,

47. Third, determining whether any breaches found amounted to Gross Misconduct, Misconduct or Neither.

Stage Two

48. Fourth, determining the appropriate outcome.

49. The Panel ensured that each stage required separate consideration and discrete findings supported by sufficient reasons.

Panel Decisions

Findings of fact

50. The first stage for the Panel is to make findings of fact in relation to the allegations. In doing so, the panel was assisted by all of the evidence before it, and the submissions made by the parties.

51. The burden of proof is on the Appropriate Authority, and it is the simple balance of probabilities, namely what is more likely than not.

52. The Panel accepted the admissions as framed and find these matters proved on the balance of probabilities.

Principals for Assessing Evidence

53. The Panel heard and received all the evidence in this case. The Panel decided the case solely based on the evidence it heard during the hearing and contained in the bundles. The Panel did not speculate about evidence that was not before it.

54. Each member of the Panel brought to the case the benefit of their own experience and knowledge. The Panel reminded itself, however, that such experience was relevant only to its assessment of the evidence properly before it. No additional evidence was introduced by members of the Panel during deliberation.

55. The case was determined solely on the evidence heard during the hearings and contained within the bundles. The Panel recognised that it would be unfair to place reliance upon matters that the parties had not had the opportunity to hear, consider, or make submissions.

56. The Panel did not assess the evidence in isolation but considered the relevance of each piece of evidence in the context of the evidence as a whole.

In determining whether an allegation was proved, the Panel considered the totality of the evidence.

57. The Panel considered issues of credibility, reliability, consistency, and demeanour when assessing the evidence. The Panel recognised that demeanour alone is not a reliable indicator of truthfulness and assessed the evidence primarily by reference to the content of the evidence itself, its consistency with other evidence, and the surrounding circumstances.

58. The Panel dispassionately considered the evidence and did not take into account the potential consequences of any findings. Any sympathy the Panel may have had for those affected by the proceedings was put to one side, and the Panel considered the evidence alone.

Breaches of the Standards of Professional Behaviour

59. In relation to these allegations, the Appropriate Authority alleges breaches of the following Standards of professional behaviour:

- Honesty and Integrity
- Confidentiality
- Authority, Respect and courtesy
- Equality and Diversity
- Discreditable Conduct
- Challenging and Reporting Improper Conduct

60. The Panel considered each alleged breach of the Standards of Professional Behaviour separately by reference to the factual findings made and the evidence before it.

61. Having considered all of the evidence together with the submissions made by the parties, the Panel reached the following conclusions.

62. Allegation One

It was alleged within the Regulation 30 Notice, and further particularised within the Appropriate Authority's opening note, that messages exchanged between PS Dolan and PC Jones included messages from PS Dolan that were:

- a) Racist
- b) Sexist
- c) Mocking of the disabled
- d) Disparaging and offensive about colleagues and/or
- e) Mocking of student officers

It was alleged that the behaviour breached the following standards of professional behaviour:

- a) Honesty and integrity
- b) Authority, Respect and Courtesy

- c) Equality and Diversity
- d) Discreditable conduct

It was further alleged that the failure to challenge these messages was a breach of:

- e) challenging and reporting improper conduct

Findings

The panel is not satisfied that the Appropriate Authority has provided sufficient evidence to demonstrate on the balance of probabilities that PS Dolan was racist in the messages exchanged.

The Panel did not find that merely referring to another individual as racist was sufficient, in itself, to establish that PS Dolan had racist views.

In reaching those conclusions, the Panel considered the wider context of the exchanges relied upon by the AA. In relation to the messages concerning the Panel accepted PS Dolan's explanation that the comments related to concerns regarding work performance and allegations of laziness rather than race. The Panel noted that surrounding message referred to the individual allegedly sleeping whilst on shift and did not consider that the evidence established hostility toward race or ethnicity.

In relation to the reference to recruitment at a mosque, the Panel accepted that a recruitment event at a mosque had in fact taken place that this reference was reflection of a factual event that occurred

Whilst the language used by PS Dolan was regarded by the Panel as inflammatory, disparaging and offensive, the Panel was not satisfied on the balance of probabilities that the messages demonstrated racist intent or amounted to racist conduct.

The Panel also took into account the evidence before it concerning the officer's involvement in equality, diversity and inclusion work. Whilst such evidence was not determinative, the Panel considered it formed part of the overall context when assessing whether the AA had proved the allegations of racism on the balance of probabilities.

The Panel is not satisfied that the Appropriate Authority has provided sufficient evidence to demonstrate on the balance of probabilities that PS Dolan was sexist in the messages exchanged.

The Panel accepted that some of the language used was inappropriate, disparaging, and offensive. However, the Panel was not satisfied that the evidence demonstrated hostility toward women generally or that the comments were motivated by gender-based prejudice. The Panel therefore concluded that the allegations of sexist conduct were not proved on the balance of probabilities.

The Panel was satisfied that the Appropriate Authority had provided sufficient evidence to demonstrate on the balance of probabilities that PS Dolan used language which mocked disabled individuals in two of the three messages alleged, namely the references to “spacker” and “the Harveys who need to be read to”.

The Panel was not satisfied that the AA had proved the allegation concerning “licker”. The Panel considered that there was insufficient evidence to establish that this was reference to “window licker” rather than the alternative meaning advanced by PS Dolan.

In relation to “spacker” the Panel did not accept PS Dolan’s explanation that she understood the term to mean “slacker”, “clumsy” or “silly fool”. The Panel considered that explanation as not credible when the message was read out in context, including the continuation of the exchange and PS Dolan’s response “like them all pmsl”. The Panel preferred the Appropriate Authority’s interpretation of the message.

The Panel considered that the terminology used within the messages was derogatory toward disabled individuals and amounted to mocking and discriminatory language inconsistent with the Standards of Professional Behaviour expected of a police officer.

The Panel is satisfied that the Appropriate Authority has provided sufficient evidence, together with the admissions made, to demonstrate that on the balance of probabilities that PS Dolan made disparaging and offensive remarks about colleagues in 23 of the 26 messages alleged in Schedule A. The three that were not found are:

- 4th August 2021 = “rubbish”
- 1st November 2021 = “twat / tosser”
- 19th November 2021 = “car crash”

The panel is further satisfied that the Appropriate Authority has established on the balance of probabilities that PS Dolan made comments mocking student officers in four of the seven messages alleged in schedule and these were:

- 20th August 2021 “Harveys who need to be read to”
- 18th November 2021 “Muppets”
- 29th November 2021 “Spacker”
- 23rd of December 2021 “Muppets”

Standards of Professional Behaviour

Honesty and integrity

The Appropriate Authority made it clear that honesty itself was not alleged in relation to this allegation. The Panel therefore did not consider dishonesty as part of its determination.

However, the Panel did accept the point made on behalf of PS Dolan that not every case involving misconduct is a breach of integrity. The panel was satisfied that on the balance of probabilities PS Dolan acted in a manner amounting to a serious departure from the expected standards of a police officer. The Panel therefore concluded that the Standards of Professional Behaviour relating to integrity were breached.

Authority, Respect and Courtesy

In addition to the admissions made, the Panel found on the balance of probabilities that PS Dolan has failed to treat colleagues with respect and courtesy on numerous occasions through the offensive and disparaging language used within the messages.

Equality and Diversity

The panel was satisfied on the balance of probabilities the Standards of Professional Behaviour relating to Equality and Diversity were breached. The language used concerning disabled individuals, including references to "Spacker" and "Harvey's who need to be read to" was discriminatory in nature and inconsistent with the standards expected of a police officer.

Discreditable Conduct

The panel was satisfied that on the balance of probabilities that the offensive, mocking, disparaging and discriminatory messages shared by PS Dolan had the potential to undermine public confidence in the police service and bring discredit upon it. The Panel therefore found this standard breached.

Challenging and Reporting

The panel was satisfied that on the balance of probabilities PS Dolan breached the Standards of Professional Behaviour relating to Challenging and reporting Improper Conduct by failing to challenge PC Jones' messages sent by others. The Panel found that she allowed the conversations to continue and grow when she could have challenged at an early stage, given that she is both a Sergeant and Trainer.

63. Allegation Two

It was alleged within the Regulation 30 Notice, and further particularised within the Appropriate Authority's opening note, that PS Dolan shared confidential information on eight occasions.

It was alleged that such behaviour breached the following Standards of Professional Behaviour:

- a) Confidentiality

- b) Authority, Respect and Courtesy
- c) Discreditable conduct

Findings

The Panel considered each of the eight allegations relating to the sharing of confidential information separately and by reference to the evidence before it, including the relevant messages, admissions made, and the surrounding context in which the information was shared.

The Panel was satisfied on the balance of probabilities that the Appropriate Authority has provided sufficient evidence, together with the admissions made, to demonstrate, that four of the eight allegations demonstrated that PS Dolan shared confidential information with PC Jones. These were:

- a) 15 September 2021
- b) 2nd November 2021
- c) 18 November 2021
- d) 29 November 2021

The Panel found that the information shared within those messages amounted to confidential policing information which ought not to have been disclosed within the context in which it was shared.

In relation to allegation C, the Panel was satisfied that PS Dolan disclosed confidential information relating to another student, including examination results and discussion concerning potential Regulation 13 proceedings. The Panel did not accept PS Dolan's explanation that the comment "don't tell anyone or I'll be in trouble" was intended as a joke, particularly when viewed in the context of the wider exchange. The Panel also rejected PS Dolan's explanation that the reference to " " was posed as a question rather than disclosure of information.

The Panel was not satisfied that the remaining allegations were proved on the balance of probabilities. In reaching that conclusion, the Panel considered, amongst other matters, whether the information disclosed was properly capable of amounting to confidential information and whether the evidence before it was sufficient to establish the allegations advanced.

In relation to some of the allegations, the Panel accepted the explanations advanced by PS Dolan or concluded that the evidence before it was insufficient to establish that confidential information had in fact been disclosed.

Standards of Professional Behaviour

Confidentiality

The Panel was satisfied on the balance of probabilities that PS Dolan breached the Standards of Professional Behaviour relating to Confidentiality by sharing information obtained through the course of police duties through her role as a Sergeant and Trainer, in circumstances where there was no proper policing purpose for doing so.

The Panel considered that police officers are entrusted with sensitive information and are expected to treat such information with appropriate care and respect. The Panel found that PS Dolan failed to treat confidential information appropriately and disclosed such information without a proper policing purpose.

Authority, Respect and Courtesy

The Panel was satisfied on the balance of probabilities that PS Dolan breached the Standards of Professional Behaviour relating to Authority, Respect and Courtesy.

The Panel found that PS Dolan abused her position as a Police Sergeant by sharing confidential information relating to other student officers with another student officer. The Panel considered that such conduct demonstrated a lack of professional judgement and failed to treat those officers with appropriate respect and courtesy.

Discreditable Conduct

The Panel was satisfied on the balance of probabilities that PS Dolan breached the Standards of Professional Behaviour relating to Discreditable Conduct.

The Panel considered that the sharing of confidential information relating to student officers with another student officer in this manner was likely to undermine public confidence in the police service and bring discredit upon it.

64. Allegation Three

It was alleged within the Regulation 30 Notice, and further particularised within the Appropriate Authority's opening note, that a conflict of interest arose beyond what had already been declared because:

- a) PS Dolan was exchanging inappropriate messages with student officer
- b) PS Dolan failed to challenge inappropriate text messages and
- c) PS Dolan disclosed confidential information about colleagues to a student officer

It is alleged PS Dolan failed to report this conflict or take appropriate steps to remove herself from the situation and thereby breached the Standards of Professional Behaviour relating to Discreditable Conduct.

Findings

The Panel considered the evidence relating to the relationship and communications between PS Dolan and PC Jones, together with the surrounding circumstances and the admissions made.

The Panel was satisfied that the exchange of messages continued over a prolonged period despite PS Dolan having identified and declared a potential conflict of interest at an early stage.

The Panel, on the balance of probabilities, found that an actual conflict of interest subsequently arose though the sustained messaging between the parties, including the sharing of inappropriate and confidential information. The Panel considered that the circumstances had developed beyond the scope of the original declaration.

The Panel further found that the continued participation in inappropriate communications, the failure to challenge inappropriate conduct, and the disclosure of confidential information created a situation capable of giving rise to both an actual and perceived conflict of interest.

The Panel was satisfied on the balance of probabilities that no appropriate steps were taken to raise further concerns or remove herself from the situation once the conflict had developed beyond that originally declared.

Standards of Professional Behaviour

Discreditable Conduct

The Panel was satisfied on the balance of probabilities that PS Dolan breached the Standards of Professional Behaviour relating to Discreditable Conduct.

The Panel considered that police officers are expected to maintain professional boundaries and appropriately manage conflicts of interests, whether actual or perceived.

The Panel found that the failure to report or appropriately manage the conflict of interest in the circumstances of this case had the potential to undermine public confidence in the police service and bring discredit upon it.

Misconduct, Gross Misconduct or neither

65. The Panel reminded itself that "Misconduct" is defined as a breach of the Standards of Professional Behaviour so serious as to justify disciplinary action, and "Gross Misconduct" is defined as a breach of the Standards of Professional Behaviour so serious as to justify dismissal.
66. The Panel considered the seriousness of the conduct both individually and cumulatively, together with the nature and extent of the breaches found proved.
67. The Panel took into account the prolonged and repeated nature of the conduct, the offensive and discriminatory language used, the failure to challenge inappropriate conduct, the sharing of confidential information, and the failure to appropriately manage and report the conflict of interest when it arose.
68. The Panel further considered the impact such conduct would have upon public confidence in the police service and the reputation of the profession.
69. Taken together, the Panel was satisfied that the breaches of the Standards of Professional Behaviour were so serious that they amount to Gross Misconduct

Sanction and Outcome

70. The panel heard submissions on sanction from both the Appropriate Authority and PS Dolan's representative.
71. The Panel adjourned to consider outcome and, in doing so, followed the three-stage approach set out within the College of Policing Guidance on Outcomes in Police Misconduct Proceedings.
72. The panel considered the College of Policing Guidance on Outcomes in Police Misconduct Hearings and bore that guidance in mind in its deliberations.
73. The panel had sight of, and took into account PS Dolan's service record, together with the substantial personal mitigation, including character evidence advanced on her behalf.
74. The panel adopted the three-stage process as outlined in the College of Policing 's Guidance on Outcomes in Police Misconduct Proceedings to determine the appropriate outcome.
75. The panel bore in mind the threefold purposes of the police misconduct regime namely:
 - (a) Maintain public confidence in and the reputation of the police service
 - (b) Uphold high standards in policing and deter misconduct
 - (c) Protect the public
76. The Panel reminded itself that any outcome imposed may have a punitive effect and therefore should be no more than is necessary to satisfy the purpose of the proceedings.
77. The Panel further reminded itself that it must consider the least severe outcome first before moving to more severe outcomes and impose the least severe outcome capable of adequately addressing the issued identified whilst protecting the public interest.
78. The Panel also recognised that where an outcome is necessary to satisfy the purpose of the proceedings, it must impose that outcome even where doing so may lead to significant consequences for the individual officer.

Seriousness

79. The first stage is to assess the seriousness of the conduct. This is assessed by reference to:
 - a) The officer's culpability
 - b) The harm caused by the misconduct
 - c) The existence of aggravating features
 - d) The existence of mitigating features

Culpability

80. The Panel assessed culpability as high.

81. In reaching that conclusion, the Panel considered the repeated nature of the conduct over a prolonged period of approximately 18 months, the repeated breaches of multiple Standards of Professional Behaviour, the sharing of confidential information, the failure to challenge inappropriate conduct, and the failure to appropriately manage and report the conflict of interest which arose.

82. The Panel also took into account the officer's leadership role and considered that police officers in supervisory and training positions are expected to model and uphold the highest professional standards.

Harm

83. The Panel assessed harm as high.

84. The Panel considered that the conduct had the potential to undermine public confidence in the police service and damage the reputation of policing. The Panel also considered the discriminatory, offensive, mocking and inappropriate nature of the messages together with the sharing of confidential information and the broader impact such conduct would have if known to the public.

Aggravating Features

85. The Panel identified a number of aggravating features, including the sustained nature of the conduct over a prolonged period, the repeated breaches of the Standard of Professional Behaviour, the officer's leadership role, the failure to challenge inappropriate conduct, and the sharing of confidential information.

Mitigating Features

86. The Panel took into account the mitigating factors identified on behalf of the officer, including the substantial personal mitigation, character evidence and admissions made in relation to aspects of the misconduct.

Overall Assessment of Seriousness

87. Having assessed culpability, harm, aggravating factors and mitigating factors, the Panel concluded that the seriousness of the misconduct case was high.

88. The Panel considered that the sustained and repeated nature of the conduct, the breaches of multiple Standards of Professional Behaviour, the sharing of confidential information, the discriminatory and offensive communications, the failure to challenge inappropriate conduct, and the failure to appropriately manage and report the conflict of interest significantly increased the seriousness of the misconduct.

89. Whilst the Panel took into account the mitigation, character evidence and personal mitigation advanced on behalf of the officer, the Panel did not consider that those matters materially reduced the overall seriousness of the misconduct.

90. Having assessed seriousness, the Panel reminded itself of the purpose of the police misconduct regime before determining the appropriate outcome. The Panel bore in mind the threefold purpose of the regime, namely:

- Maintaining public confidence in and the reputation of the police service.
- Upholding high standards in policing and deterring misconduct; and
- Protecting the public.

Consideration of Available Outcomes

91. The Panel considered whether a final written warning, or reduction in rank would sufficiently maintain public confidence in and the reputation of the police service, uphold high standards in policing, and protect the public.

92. The Panel considered the seriousness of the misconduct, the sustained and repeated nature of the conduct over a prolonged period, the officer's leadership role, the discriminatory and offensive communications, the sharing of confidential information, and the failure to appropriately manage and report the conflict of interest which arose.

Outcome

93. The Panel concluded that such outcomes would be insufficient in the circumstances of this case.

94. The Panel therefore concluded that dismissal without notice was the only outcome capable of adequately addressing the seriousness of the misconduct and maintaining public confidence in the police service.

95. The Panel therefore directed that PS Natalie Dolan be dismissed from the police service without notice and further directed that her name be placed upon the College of Policing Barred List.

Right of appeal

96. In accordance with regulation 43(2) of the Police (Conduct) Regulations 2020, the officer has a right of appeal to a Police Appeals Tribunal against the findings and outcome of this misconduct hearing.

97. Subject to the provisions of the Police Appeals Tribunal Rules 2020, notice of appeal must ordinarily be given before the end of 10 working days beginning with the first working day after the day on which the officer is supplied with a written copy of the relevant decision.

Publicity

98. In accordance with regulation 43(6) of the 2020 Regulations, the Appropriate Authority will publish this report on the Greater Manchester Police website for not less than 28 days as soon as practicable after receipt of the report and notification to the officer concerned, subject to any reporting restrictions, anonymity orders, or other restrictions previously imposed during the proceedings.

100. If the Officer exercises her right to appeal to a Police Appeals Tribunal, the AA will in due course be required to re-publish this report under regulation 26(11)b of the Police Appeals Tribunal Rules 2020.

101. This concludes the Outcome Report.

A handwritten signature in black ink, appearing to read 'L Rawlinson', with a stylized initial 'L'.

CRO Lee Rawlinson MBE

29th May 2026

Advice in response to the indication that there will be written submissions

I note that there has been an indication that written submissions may be provided following the evidence at the conclusion of Stage 1.

Given the nature of the issues in this case, written submissions may assist the Panel. Whether to permit written submissions, and on what terms, is a matter for your discretion. If you are minded to allow this, you may wish to give brief directions as to timing and to ensure that all parties are afforded an equal opportunity to make submissions and respond.

Advice to the panel for the final hearing

The task of the panel on disputed matters of fact is not, as such, to determine the truth. It is to identify what needs to be proved, by whom, in this case the appropriate authority, upon the basis of a correct identification and analysis of the legal rules governing the case. It must then form a judgment (doing so rationally, reasonably and impartially), for each such proposition of fact, as to whether the evidence presented at the hearing made what the party bearing the burden of proof says occurred appear – more probably than not – to be what occurred.

The law in respect of factual determinations

The burden of proving the facts pleaded rests with the appropriate authority.

The standard to which the Appropriate Authority must satisfy the panel is the simple balance of probabilities. The inherent probability or improbability of an event remains a matter to be taken into account when weighing the probabilities and deciding whether, on balance, the event occurred. Within this context, there is no room for a finding by the panel that something might have happened. The panel may decide that it did or that it did not: **Re B [2008] UKHL 35**.

Findings of fact must be based on evidence and not on speculation. The decision on whether the facts in issue have been proved to the requisite standard must be based on all of the available evidence.

In determining whether the Appropriate Authority has discharged the burden upon it, the panel looks at what has been described as ‘the broad canvas’ of the evidence before it. The role of the panel is to consider the evidence in its totality and to make findings on the balance of probabilities accordingly. Within this context, the panel must consider each piece of evidence in the context of all of the other evidence: **Re T [2004] 2 FLR 838**.

The panel must always bear in mind that a witness may tell lies in the course of an investigation. The panel must be careful to bear in mind that a witness may lie for many reasons, such as shame, misplaced loyalty, panic, fear or distress. The fact that a witness has lied about some matters does not mean that he or she has lied about everything: **R v Lucas [1982] QB 720**.

The panel also need to consider their purpose within the misconduct regime which is:

1. to maintain public confidence and the reputation of the police service
2. to uphold high standards in policing and deter misconduct
3. to protect the public.

Principles for Assessing Evidence

1. The Panel must decide the case solely based on the evidence it has heard in the hearing room and read in the bundle the parties have agreed.
2. The Panel must not speculate about other matters such as other evidence it believes might be available, what it believes someone else might have said, or what it believes some other document, not in the bundle, might have said. If there are, in the Panel's judgement, 'holes' or 'gaps' in the evidence, then that is a matter that the Panel must consider in deciding whether the AA has – in fact - proved the allegations it makes.
3. Each Panel member brings to this case the benefit of their own experience and knowledge. The Panel must remind itself, however, that the experience of any of its members is relevant only to its analysis of the evidence it has heard in the hearing room and read in the bundle. Evidence must not be introduced by a Panel member in the course of the Panel's deliberations. The case must be tried solely on the basis of the evidence that has been heard in the hearing room or in the bundle the parties have access to; to place reliance on matters that the parties have not had the opportunity to hear, consider, or make submissions about would be wholly unfair.
4. The Panel must not evaluate and assess the available evidence in separate compartments; rather, regard must be had to the relevance of each piece of evidence to other evidence. If evidence is accepted on one matter, the Panel should consider how that acceptance affects its consideration of other evidence; likewise if the Panel rejects evidence on something – that might affect the Panel's consideration of other evidence. In deciding whether an allegation is proved, the Panel must consider the totality of the evidence.

5. Where there is little or no corroborating evidence for an allegation, the evidence that is available will either be sufficient or not sufficient to prove the facts in issue to the appropriate standard. The Panel is well-placed to assess credibility, demeanour, and themes in the evidence.

6. The Panel will need to examine each witness' credibility, including each witness' consistency; the Panel should consider any understandable reasons for a lack of consistency. The Panel will need to form a view, if it finds that a witness has embellished or exaggerated their written or oral evidence or that – in certain respects, the witness is unreliable - whether that fact undermines the entirety of that witness' evidence.

7. The Panel can take notice of the fact that people can have faulty recollection of events or be confused at times of stress or when the importance of accuracy is not fully appreciated.

8. The effect of delay and repeated questioning upon memory should also be considered. In the context of cases concerning serious injuries to children, Peter Jackson J (as he then was) said in **Lancashire County Council v C and others (Children: Fact-finding) [2014] EWHC 3 (Fam)**, at [9], "As memory fades, a desire to iron out wrinkles may not be unnatural – a process that might inelegantly be described as "story-creep" may occur without any necessary inference of bad faith".

9. The Panel can take into account the demeanour of a witness when they gave evidence but should guard against an assessment of a witness' credibility based solely on their demeanour in answering counsel's questions. Demeanour is simply one part of the Panel's assessment of a witness' credibility; what that witness said, and its consistency with other statements they made or other documents in the bundle, will form a substantial part of the Panel's assessment.

10. All of the above directions about how to assess evidence apply with equal force to all witnesses even when witnesses give evidence behind screens or by video link.

11. It is the duty of the Panel to dispassionately consider the evidence and to not have any regard to the consequences of any findings the Panel may or may not make. Whatever sympathy the Panel may have for any of the people touched by this case, these must be set to one side and the Panel must consider the evidence in this case alone.

Cogent Evidence required

This is referred to in the case of **Wilby-Newton [2021] EWHC 550 (Admin)**, at paragraphs 88 to 90:

'88. I begin with the self-direction on the burden and standard of proof which the Panel set out at [5] of its decision:

"5. The burden is on the Appropriate Authority to prove the allegation. The standard is the balance of probabilities. The more serious the allegation of misconduct that is made or the more serious the consequences for the individual which flow from a finding against him the more persuasive (cogent) the evidence will need to be to meet this standard."

89. This was a wholly correct direction. The third sentence is a reflection of what Lord Hoffmann said in Secretary of State for the Home Department v Rehman [2003] 1 AC 153, 194:

"The civil standard of proof always means more likely than not. The only higher degree of probability required by the law is the criminal standard. But, as Lord Nicholls of Birkenhead explained in In re H (Minors) (Sexual Abuse: Standard of Proof) [1996] AC 563, 586, some things are inherently more likely than others. It would need more cogent evidence to satisfy one that the creature seen walking in Regent's Park was more likely than not to have been a lioness than to be satisfied to the same standard of probability that it was an Alsatian. On this basis, cogent evidence is generally required to satisfy a civil tribunal that a person has been fraudulent or behaved in some other reprehensible manner. But the question is always whether the tribunal thinks it more probable than not."

90. There can be no doubt, therefore, that the Panel began from the correct starting point in considering on whom the burden of proof lay, and to what standard.'

Credit/Good Character legal advice

1. The law in relation to the Officer's character may be summarised as follows:

- a. 'Good character' arises from the lack of any previous findings against the officer.
- b. Good character is not of itself a defence to an allegation.
- c. Good character can properly be considered when considering an officer's credibility. It is not limited to allegations of dishonesty.
- d. In general terms, 'good character' is capable of being counted in an officer's favour in two ways:
 - i. The Panel may decide that good character evidence supports an officer's credibility, and so is something which the Panel should consider when deciding whether they believe their evidence (the 'credibility limb'); and

- ii. Good character evidence may mean that the Officer is less likely to have acted as alleged in the allegation (the 'propensity limb').
- e. The weight that a Panel attaches to the Officer's character is entirely a matter for the Panel, considering all the evidence placed before it that bears on each fact that remains in dispute.
- f. Good character can also be evident from testimonials, and these should also be considered in relation to the propensity and credibility limb.

Role of the panel

The role of the panel has four steps, usually approached in two stages:

Stage 1

- (a) first, determining the facts, based upon what is admitted by the officer or proven on the balance of probabilities;
- (b) second, determining whether on the basis of those facts the officer has breached the Standards of Professional Behaviour alleged;
- (c) third, deciding whether the breaches found amount to gross misconduct or not;

Stage 2

- (d) deciding what the outcome should be.

The four steps should not be conflated. Each requires discrete findings with sufficient reasons.

The AA brings the allegations, and it is for the AA to prove them. The standard of proof is the balance of probabilities, that is to say whether they are more likely than not to be true. The balance of probabilities is a single unvarying standard. (see the [Home Office Guidance](#) paragraph 9.10).

Seriousness

When determining the level of misconduct, the panel should turn their minds to the assessment of seriousness. This exercise should **also** be carried out at the outcome

stage in order to determine, following submissions, whether there are any other matters to consider in relation to seriousness.

In order to determine this question of 'seriousness' the Panel should adopt the approach that is set out in the College of Policing's 'Guidance on outcomes in police misconduct proceedings' (2022), at chapter 4:

"Assess the seriousness of the proven conduct, by reference to:

- *the officer's culpability for the misconduct*
- *the harm caused by the misconduct*
- *the existence of any aggravating factors*
- *the existence of any mitigating factors "*

While section 4 is directed primarily at seriousness for the purposes of outcome, section 4.1 states, "Whether conduct would, if proved, amount to misconduct or gross misconduct for the purposes of Regulation 14 of the Conduct Regulations is also a question of degree (ie, seriousness)." Thus, a similar approach to assessing seriousness should be taken at stage 1.

The panel is reminded of the importance of not 'double counting' factors that might fall into more than one of the above categories.

The fact that an officer has not admitted an allegation is not an aggravating factor when determining seriousness.

When deciding on the level of seriousness the panel must engage in an analysis of the matters before them rather than merely list aggravating and mitigating matters.

The panel may find it helpful when assessing the seriousness in relation to culpability and harm, to use a scale utilising low, low/medium, medium, medium/high and high. This gives the panel more of a range to assess the seriousness. The terminology and scales used are however entirely a matter for the panel.

1. Culpability

4.9 Culpability denotes the officer's blameworthiness or responsibility for their actions. The more culpable or blameworthy the behaviour in question, the more serious the misconduct and the more severe the likely outcome.

4.10 Conduct that is intentional, deliberate, targeted or planned will generally be more culpable than conduct that has unintended consequences, although the consequences of an officer's actions will be relevant to the harm caused.

4.11 Where harm is unintentional, culpability will be greater if the officer could reasonably have foreseen the risk of harm.

4.13 It is not possible to categorise all types of case where dismissal will be appropriate because the circumstances of the individual case must be considered. Many acts have the potential to damage public confidence in the police service.

4.14 However, the types of misconduct given in the following sections should be considered especially serious.

When considering culpability, the panel should also consider any of the sub-headings that may apply. Counsel for the AA and the officer should refer to any sections they consider are relevant to the particular case.

2. Harm

Effect on the police service and/or public confidence

4.66 Harm will likely undermine public confidence in policing. Harm does not need to be suffered by a defined individual or group to undermine public confidence. Where an officer commits an act that would harm public confidence if the circumstances were known to the public, take this into account. Always take misconduct seriously that undermines discipline and good order within the police service, even if it does not result in harm to individual victims.

4.68 Where no actual harm has resulted, consider the risks attached to the officer's behaviour, including the likelihood of harm occurring and the gravity of harm that could have resulted.

4.69 How such behaviour would be, or has been, perceived by the public will be relevant, whether or not the behaviour was known about at the time.

4.70 If applicable, consider the scale and depth of local or national concern about the behaviour in question.

4.74 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 the greatest importance is the impact of the misconduct on the standing and reputation of the profession as a whole. For example, violence against women and girls perpetrated by a police officer, whether on-duty or off-duty, will always harm public confidence in policing, since this is inimical to the values of modern policing and the Standards of Professional Behaviour.

The panel should then consider aggravating and mitigating factors. There is a helpful list within the guidance on outcomes, but the panel does not need to be limited to the matters they find there if there is another factor that is relevant to their determination of seriousness.

3. Aggravating factors

4.76 Factors that indicate a higher level of culpability or harm include:

- premeditation, planning, targeting, or taking deliberate or predatory steps
- malign intent, such as sexual gratification
- significant deviation from instructions, whether an order, force policy or national guidance

4. Mitigating factors

4.79 Mitigating factors are those tending to reduce the seriousness of the misconduct. Some factors may indicate that an officer's culpability is lower, or that the harm caused by the misconduct is less serious than it might otherwise have been. This is not the same as personal mitigation, which is dealt with in the 'Personal mitigation' section of this guidance. Take care not to confuse personal mitigation with those mitigating factors that had an impact on the misconduct at the time.

4.81 Factors indicating a lower level of culpability or harm include:

- *misconduct confined to a single episode or brief duration*
- *open admissions at an early stage*
- *early actions taken to reduce the harm caused*
- *evidence of genuine remorse, insight and/or accepting responsibility for one's actions*

Level of Misconduct

It is alleged by the Appropriate Authority that the breaches amount to gross misconduct.

Gross misconduct means a breach of the standards of professional behaviour which is so serious as to justify dismissal.

Misconduct means a breach of the standards of professional behaviour that is so serious as to justify disciplinary action.

Outcome stage

When moving onto the outcome stage the panel should as mentioned above look again at seriousness and determine, following submissions, if there are any changes they wish to make to their seriousness assessment.

4.4 When considering the outcome, first assess the seriousness of the misconduct, taking account of any aggravating or mitigating factors. The most important purpose of imposing disciplinary sanctions is to maintain public confidence in, and the reputation of, the policing profession as a whole. This dual objective must take precedence over the specific impact that the sanction has on the individual whose misconduct is being sanctioned.

4.5 Consider personal mitigation, such as testimonials and references, after assessing the seriousness of the conduct by the four categories above.

2.8 ... Always choose the least severe outcome that deals adequately with the issues identified, while protecting the public interest.

If an outcome is necessary to satisfy the purpose of the proceedings, impose it even where this would lead to difficulties for the individual officer.

Outcome stage available findings for serving officers

If the panel finds that the conduct does not amount to misconduct or gross misconduct, the panel can consider a reflective practice order for the officer.

Misconduct

If the panel finds that the conduct amounts to misconduct, the available outcomes are:

- A written warning
- A final written warning.

Further outcomes may be available depending upon submissions relating to the existence of a previous final written warning that was in place at the time of the AA's severity assessment. And where it is submitted that the conduct arises from more than one incident and those incidents are not closely factually connected.

Gross Misconduct

If the panel find that the officer's conduct amounts to gross misconduct, the only outcomes available to this Panel are:

- final written warning
- Reduction in rank (where applicable)
- dismissal without notice.

When gross misconduct is found, a final written warning is available when the panel are satisfied that there are reasons that justify a lesser finding than dismissal. The panel must clearly set out the reasons that they consider apply in this situation.

In relation to dismissal, the question the panel need to ask themselves is do the findings made reach the threshold to justify dismissal.

NB. It is worth noting that the 2025 amendments that require the setting out of exceptional circumstances, were not in force at the time of the allegations, however it is still good practice to set out reasons as to why the matter does not reach the threshold to justify dismissal if that is the finding of the panel.

Final written warnings length

If the panel decides to impose a final written warning, they must consider the matters at paragraph 3.16 of the guidance on outcomes in order to determine the length of the final written warning. This can be between 2 and 5 years.

The panel must consider the following:

- The seriousness of the conduct
- The circumstances that gave rise to the misconduct
- The public interest
- The mitigation offered by the officer, including previous record of conduct.

The role of the LQP

In line with the regulations, the LQP is there to give advice to the panel on law and procedure which includes advice that is requested and ad-hoc advice.

The LQP is not allowed to play any part whatsoever in the decision-making process and cannot contribute to decisions in any way.

The LQP cannot draft findings that are to be given to parties during the hearing or suggest alternate wording. The LQP can check the decisions made by the panel and where appropriate advise the panel where additional reasoning or rationale would be required.

LQP Emma Hutchinson

22.04.2026

Honesty and Integrity

The case of Ivey v Genting Casinos (UK) Ltd T/A Crockfords [2017] UKSC 67 provides the test for dishonesty.

The case of Wingate v SRA [2018] EWCA Civ 366 provides the test for integrity.

Albeit they appear in the same heading in the code of ethics, honesty and integrity can be separated for consideration, as per:

Chief Constable of Thames Valley Police v police misconduct panel and White (2017) EWHC 923 (Admin)

Mrs Justice Maura McGowan said in that judgement:

“...A lapse of integrity is very serious but can fall short of the quality of a lapse of honesty. Integrity is in this context is not used in the sense of freedom from moral corruption rather in the sense of a failing to act in the right way, not behaving as the totally correct police officer would, in some way falling short of the whole. It is explained for police officers as “doing the right thing”

Integrity is able to be assessed separately from honesty in line with this case.

Dishonesty is not an issue in the facts of this particular case.

In Wyngate, the Court explained that integrity involves:

- Adherence to the ethical standards of the profession
- Conduct showing moral soundness
- Acting in a way consistent with what the profession expects

So, the focus is not just whether the officer told the truth, but whether they acted in a way consistent with professional values.

It is not the case that: “Any inappropriate conduct = lack of integrity”

As the Wyngate case does not say that.

In Wyngate, the Court of Appeal confirmed that integrity is a broader concept than honesty and involves adherence to the ethical standards of the profession. A person may lack integrity even in the absence of dishonesty, and the assessment is objective.

The panel should therefore consider whether the conduct represents a serious departure from the ethical standards expected of a police officer, as opposed to conduct more appropriately addressed under other Standards.

LQP - Emma Hutchinson

