



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

Police Constable Officer A

Decision of the Independent Chair Jonathan Roy

1st October 2026

Preliminary matters

1. I have today conducted an accelerated misconduct hearing and have given consideration to various breaches of the standards of professional behaviour as pertain to Police Constable **Officer A** (to be referred to publicly as Officer A).
2. The Appropriate Authority was represented by Ms. Anna Semprini. **Officer A** was in attendance with Mr. Mark Wood of the Police Federation.
3. The allegation is set out in the Regulation 51 Notice (pages 1-2 of the bundle), namely:
 - 1.1. *Officer A joined GMP on 9 December 2019. At the time of the alleged conduct, she had between three and four and a half years' service.*
 - 1.2. *Audit checks revealed that whilst on duty on 2nd September 2023, 13th March 2024 & 21st April 2024 Officer A accessed GMP computer systems in order to carry out research on, and access information about six individuals (Persons A, B, C, D, E and F). There was no policing purpose for doing so.*
 - 1.3. *Officer A was arrested on 22 October 2025 and, during interview under caution, she admitted conducting the searches on the dates above and admitted that she had no policing purpose to do so.*

- 1.4. *On 30 June 2026 Officer A signed a Conditional Caution in relation to obtaining/disclosing personal data without the consent of the data controller, which is a breach of s.170 of the Data Protection Act 2018.*
4. **Officer A** has provided a Regulation 54 response, contained within the bundle in which the officer accepts that:
- (a) Admits that her actions amount to a breach of the relevant Standards of Professional Behaviour; and*
 - (b) Admits that those breaches amount to gross misconduct.*
 - (c) puts forward mitigation and submits that a Final Written Warning is an appropriate outcome.*
5. **Officer A** accepts her actions as alleged. She further accepts the breaches of the Standards of Professional Behaviour of Honesty & Integrity, Discreditable conduct, Orders & Instructions and Confidentiality.
6. The officer accepts that her conduct amounts to gross misconduct.
7. I fully accept the AA's submission that it is unacceptable for police officers, who are responsible for enforcing the law, to break the law themselves. It is also unacceptable for them to act in a way which endangers members of the public and other police officers. **Officer A**'s conduct, which she admits, involves a fundamental breach of the public's trust in police officers and inevitably brings the wider profession into disrepute.
8. I conclude that the breach alleged is proven and it is so serious it amounts to gross misconduct.

Outcome

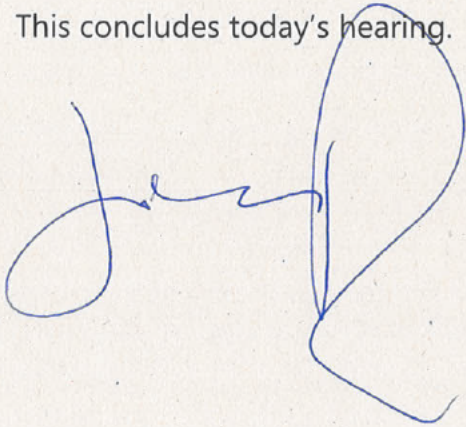
9. In coming to a determination as to the most appropriate outcome, I have considered the submissions of the Appropriate Authority as contained within the bundle of evidence submitted to me prior to this hearing, along with verbal submissions by the representative of the Appropriate Authority.
10. **Officer A** provided a Regulation 54 response in which she made full and open admissions and demonstrated remorse and insight. She also offered some explanation as to why she had conducted some of the computer checks beyond that of mere curiosity.

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 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. However, the effect of Regulation 62 of the Police (Conduct) Regulations 2020 [as amended from 28 May 2025] is that, where an AMH finds that the conduct of the officer amounts to gross misconduct, they must dismiss that officer without notice, unless satisfied that there are exceptional circumstances to justify not doing so. There is, therefore, a presumption of dismissal. The term 'exceptional circumstances' is not further defined in the legislation.
12. It is a matter of fact that **Officer A** has accepted a conditional caution for a criminal offence.
13. I received written and verbal submissions from the Appropriate Authority that the appropriate disciplinary outcome in this case is dismissal without notice and the placing of her 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. I have reminded myself that what is of paramount importance is the purpose of misconduct proceedings – these are expressly set out in the 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" referred to in the guidance when considering whether 'exceptional circumstances' exist that may justify any derogation from the principal of dismissal. 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. In coming to a determination in respect of outcome I have considered the submissions of the Appropriate Authority as presented by Ms Semprini.

18. I have further considered the submissions of the officer in respect of similar allegations faced by a GMP officer (2026). Each matter subject of misconduct proceedings must be considered objectively. In this case I have given limited weight to the outcome in the previous case due to the differences in matters of fact.
19. Culpability denotes the officer's blameworthiness and responsibility for her actions. In this case her actions were very clearly intentional, deliberate & targeted in that she purposely searched the records of 6 separate subjects. She was entirely responsible for her own actions in choosing to conduct the searches on 3 dates between September 2023 – April 2024.
20. The potential harm of her actions in terms of the impact on public confidence could, and should, have been perfectly obvious to **Officer A** and the likelihood of reputational harm to policing ought to have been foreseen by her.
21. The guidance makes clear that certain types of misconduct are to be considered as particularly serious.
22. In this case the officer has accepted a conditional caution for a criminal offence under S.170 Data Protection Act (2018). It is clearly unacceptable for police officers who are responsible for enforcing the law to break the law themselves.
23. The guidance further states (4.17) that the misuse of police computer systems is a particular concern for the Police Service whether personal benefit is gained or not.
24. I consider that **Officer A** 's culpability must be regarded as high.
25. No actual harm was caused by the officer's actions.
26. There was a significant potential for reputational harm to be caused both to Greater Manchester Police and the service more widely if the circumstances were known to the public. The risks attached to [redacted] acquiring confidential information about a number of subjects had the significant potential to undermine public and community confidence in policing but also to compromise police activity. [redacted]

27. This conduct also engages ongoing, and current, matters of both local and national concern in terms of unauthorised data access by those in policing and the public sector.
28. I find that there are aggravating factors present.
29. **Officer A** 's actions were repeated on 3 occasions between September 2023 – April 2024.
30. There were multiple subjects whose data was breached as a result of her conduct.
31. **Officer A** 's actions were a significant deviation from orders and instructions, in particular GMP's Appropriate Use of Information and Technology Procedure and Chief Constable's published orders.
32. In mitigation the officer made full admissions at an early stage.
33. To her credit she has demonstrated meaningful and significant insight into her actions and shown genuine remorse. She has proposed a course of remedial action that goes far beyond that which might normally be considered by an officer in her position and with her length of service.
34. There is not sufficient evidence presented to suggest that her actions were as the result of any mental health condition or stress that caused her to act in the way she did or to offer further mitigation to her conduct.
35. With regard to personal mitigation, of those set out in the College of Policing's Guidance, I have taken into account **Officer A** 's record of service. She is of previous good character and I note the support offered in the character evidence submitted on her behalf. The personal mitigation advanced does not however meaningfully detract from her conduct and I have given it limited weight in determining the seriousness of her conduct in this matter.
36. 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 substantially diminish public confidence. In conclusion, I consider that the level of seriousness in this case is high.

37. Greater Manchester Police expects the highest standards of professional behaviour from its officers and staff both on and off duty. The behaviour of PC **Officer A** was a significant breach of the trust placed in her as a police officer.
38. I am reminded that the presumption in this case of gross misconduct is dismissal and in this case the weight of evidence presented in favour of the officer is not sufficient to justify deviation from that presumption and that the most appropriate sanction in relation to the seriousness of the conduct is that **Officer A** is dismissed without notice.
39. I also order that **Officer A**'s name be added to the College of Policing's Barred List.
40. This concludes today's hearing.

A handwritten signature in blue ink, consisting of a stylized 'J' followed by a horizontal line and a large, loopy 'P'.