In the matter of the Police (Conduct) Regulations2020
and in the matter of

Former Police Sergeant 18853 Smith

Decision of the Independent Chair Catherine Hankinson
15th October 2026

Preliminary matters

1. I have today conducted an accelerated misconduct hearing on behalf of Greater Manchester Police. The hearing was held online and I have given consideration to a number of allegations and breaches of the standards of professional behaviour as pertain to former Police Sergeant 18853 Liam Smith.

2. The Appropriate Authority was represented by Richard Black. Former PS Smith chose not to attend this hearing and has resigned from Greater Manchester Police as of 11th September 2026. Former PS Smith was aware that this hearing is taking place and has had opportunity to attend so I am satisfied it was appropriate for me to continue in his absence.

3. The allegations against former PS Smith are:

   (i) *Allegation 1 - Whilst off duty on August 3rd, 2024, you used your GMP issued mobile device number ending 1057 to contact a mobile telephone number ending 7756 on three occasions. The number has been attributed to an adult sex worker. There was no policing purpose for this contact.*
   Particulars i. You made a voice call to the number at 10.23 ii. You made a voice call to the number at 10.27 iii. You sent an SMS message to the number at 10.28

   (ii) *Allegation 2 - Whilst on duty on September 5th, 2024, you used your GMP issued mobile device number ending 1057 to contact a mobile telephone number*

ending 9539 on one occasion. The number has been attributed to an adult sex worker. There was no policing purpose for this contact. DMS shows that you booked off duty at 23.00
Particulars i. You made a voice call to the number at 22.39.

(iii) Allegation 3- Whilst on duty on September 5th 2024 between 22.26 and 22.44 you conducted research on your GMP issued mobile device number ending 1057 via a POLE search to research six different phone numbers all of which have been attributed to adult sex workers. There was no policing purpose for this. DMS showed that you booked off duty at 23.00
Particulars

i. At 22.26.30 you conducted a search on PoliceWorks for a number ending 9539. This was the same number that you called at as outlined in allegation 2 above.
ii. At 22.27.13 you conducted a search on PoliceWorks for a number ending 4443
iii. At 22.27.37 you conducted a search on PoliceWorks for a number ending 0387
iv. At 22.28.03 you conducted a search on PoliceWorks for a number ending 8269
v. At 22.29.00 you conducted a search on PoliceWorks for a number ending 7964
vi. At 22.44.10 you conducted a search on PoliceWorks for a number ending 1391

The above three allegations are said to breach the following standards:

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 and

Orders and Instructions: Police officers abide by police regulations, force policies and lawful orders

The matters set out above are contended to amount to gross misconduct, in that they are so serious as to justify dismissal.

4. Former PS Smith has not provided a response to the allegations and as such we have no indication as to whether he accepted the allegations breach the standards of behaviour for Discreditable Conduct and Orders and Instructions. Nor did the former officer indicate if he accepted these allegations amounted to gross misconduct or not.

5. Having considered the evidence and the verbal submissions of the Appropriate Authority, I determined it was appropriate for me to hear this case in the former officer's absence.

As set out in my stage one findings, there is sufficient evidence in the bundle to conclude that the allegations are proven. The three reasons for this are that, having been given the opportunity, the former officer has not provided any account to suggest the duty GMP mobile in question was not allocated to him or was in the possession of another person. Secondly, it is a matter of fact that the GMP mobile was used to make contact and research the numbers attributed to adult sex workers and lastly, the former officer has indicated no legitimate policing purpose for the contact.

6. Turning to the breaches of the professional standards; they too are proven for the following reasons.

7. Discreditable Conduct – the former officer's behaviour brings discredit on the police service and undermines public confidence. The public have a right to expect that they can trust police officers and would be concerned to hear of this behaviour whilst on and off duty. The AA's case is that the officer's entire conduct discredits the police service and has the potential to significantly undermine the trust that the public place in the police. I agree.

8. Orders and Instructions - Police officers abide by police regulations, force policies and lawful orders. The "Appropriate Use of Information Technology Procedure (Jan 23) and the "Appropriate Use of Your Mobile Device" policy are both clear on how officer's should use their work mobile device. I have had sight of these policies and whilst it allows appropriate use of the device for personal use, that is not unrestricted. It must be reasonable. Within the definition of reasonable are the following:

    - Outside working hours (i.e. in refreshment breaks or before/after working hours
    - Not negatively affect the reputation of GMP or public confidence

- In accordance with professional standards

In addition to this Chief Constable's order of July 3rd 2023 [p78] refers to an update to The Sex Work National Police Guidance which came into operational effect from July 3rd 2023. The Order highlights the most significant change being that the use of a sex worker is "incompatible with the role of a police officer or police staff member."

9. The former officer's use of his device regards these proven allegations falls entirely outside of these policies and guidance. I agree with the AA that the breaches of the professional standards are proven and that they are so serious that they do indeed amount to gross misconduct.

Outcome

10. 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. I also heard verbal submissions by Mr Black of the Appropriate Authority and have been provided with the former officer's record of service.

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 and the reputation of the police service.

12. 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.

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. So, turning to assessing the seriousness in terms of culpability, harm, aggravating and mitigating factors I find the following:

15. Culpability: Culpability denotes the officer's blameworthiness and responsibility for his actions- the more blameworthy the conduct, the more severe the likely outcome (para 4.9). In this case the former officer's actions were clearly intentional, deliberate and targeted. Not only was it deliberate, but the former officer would or should have understood the possible unintended consequences. As referenced in the opening note (para 43) the Guidance on Outcomes suggests certain categories of behaviour, sexual impropriety being one, can make the conduct especially serious. I find culpability to be HIGH.

16. Harm: Whilst there was no harm to a victim in this case, I am also required to consider harm to the police service. I note the submission by the AA that guidance is provided in respect of the effect on the police service and public confidence, which is of course, intrinsically linked to the overall purpose of misconduct proceedings. I am guided in para 4.66 to consider seriously, misconduct that undermines discipline and good order within the police service, even if it does not result in harm to an individual. The potential risks attached to the behaviour exhibited are clear and the gravity of harm should have been apparent to the former officer (para 4.48). The public would clearly be concerned to learn of this conduct and at para 4.74 the Guidance refers to the impact on the standing and

reputation of the police service as being of the greatest importance. I find harm to be HIGH.

17. Aggravating factors, being those that worsen the actions of the former officer, which in this case include:

- Malign intent – most likely for sexual gratification
- Regular, repeated or sustained behaviour – the former officer communicated with adult sex workers over a number of days
- Continued behaviour after the officer realised, or should have realised, it was improper – despite having no admissions from the former officer, given the policies and guidance in place and his role as a police officer, he should have known that what he was doing was wrong and improper.
- Significant deviation from instructions – there were two policies in place governing the use of the mobile device and then national guidance in respect of the fact that the role of police officer was incompatible with the contact made with adult sex workers.
- Issues of national concern – the public are rightly aware of and concerned about sexual impropriety by members of the police service. They have a right to be able to trust officers and these actions undermine that trust.
- Role model – the former officer had stepped into a position of leadership within the organisation and should have been setting the standards for his team, not breaching them.

18. Mitigating factors are for the officer to put forward – I have not heard any as the officer or his representative have not attended today. In terms of personal mitigation, I have had regard to his record of service. This appears to show that he was a reasonable police officer, but this does not take away from the facts found proven today.

19. Throughout my considerations on outcome, I have kept in mind the threefold purpose of imposing outcomes in misconduct proceedings.

20. I am considering outcome for a former officer. Given that the finding is that the former officer's actions amount to gross misconduct, and having assessed the seriousness as high, it is clear to me that there must a follow a disciplinary sanction. Having regard to the College of Policing guidance on outcomes (3.30-3.33) it follows therefore that the appropriate outcome is that the former officer would have been dismissed without notice had he still been serving.

21. I also order that former PS Smith's name be added to the College of Policing barred list.

22. This concludes the hearing.

ACO Catherine Hankinson
Greater Manchester Police Independent Chair