

British Transport Police
Regulation 43 Outcome of Police Misconduct Hearing

In the matter of :

PC Peter Glover [8932]

Panel: Ian Comfort (Legally Qualified Chair), Detective Superintendent Glen Alderson, Ms Bernadette Leverton.

INTRODUCTION

1. The misconduct hearing for PC Glover (the “Officer”) was held in public on 6 July 2026. A notice of hearing was published in accordance with the British Transport Police (Conduct) Regulations 2020 (‘the Regulations’).
2. The British Transport Police Service (“BTP”), as the Appropriate Authority (“AA”), was represented by Mr Edward Barham, Counsel.
3. The Officer attended and was represented by Ms Miranda Zeffman, Counsel.

BACKGROUND

4. The Officer joined BTP on 6 January 2020. Following his initial service as a probationary officer, he served at Waterloo before transferring to the Brighton Proactive Neighbourhood Team in 2023. His duties included both uniformed and plain-clothes policing activities. At the date of this hearing he had approximately six and a half years' police service.
5. The allegations before the Panel arose following the discovery of police material at the Officer's home address in March 2024. The Officer's former partner discovered a number of police documents and items whilst clearing his possessions and brought those matters to the attention of BTP. A supervisor attended the address and recovered the material. The items recovered included a dispersal notebook, stop and search documentation, a Community Protection Notice containing personal information and an evidence bag containing CCTV material.

6. The discovery of those items led to an investigation into the Officer's handling and retention of police information. That investigation forms the basis of Allegation 1.
7. During the course of the investigation, enquiries were also made concerning a pair of privately purchased hinged handcuffs owned by the Officer and which he had used whilst carrying out operational duties. Those matters form the basis of Allegation 2.
8. The investigation further identified an incident which occurred on 18 November 2023. Whilst dealing with a road traffic collision involving an injured motorcyclist, the Officer took a photograph using his personal mobile telephone and subsequently sent that image, together with a text message, to his former partner. Those matters form the basis of Allegation 3.
9. The AA determined that there was a case to answer in respect of all three allegations and referred the matter to a misconduct hearing.

ALLEGATIONS

10. The allegations made against the Officer are set out in the Regulation 30 notice as follows:

“Allegation 1

Between 2020-2024, whilst a serving constable, you breached the confidentiality of members of the public in that you stored personal data from members of the public relating to their engagement with the police at your home address.

The above conduct breached the Standards of Professional Behaviour of Confidentiality and Discreditable Conduct.

Allegation 2

Whilst a serving constable, you disregarded the orders and instructions of the British Transport Police in that:

- a. You purchased a pair of folding handcuffs that were not issued by British Transport Police;*
- b. You did not register the handcuffs with British Transport Police;*
- c. You took the handcuffs on operational duties.*

The above conduct breached the Standard of Professional Behaviour of Orders and Instructions.

Allegation 3

On 18th November 2023, you breached the confidentiality of a member of the public who was injured in a road traffic collision in that:

- a. You witnesses [sic] a road traffic collision in which a motorcyclist member of the public was injured;*
- b. You assisted with the incident, as a result of which you placed yourself on duty;*
- c. You took a photo of the injured member of the public on your personal mobile device; and*
- d. You sent the image to Person A along with a message that read “[Person A] I’m sorry but currently on scene at a bad RTC with someone who looks like Matt”.*

The above conduct breached the Standard of Professional Behaviour of Discreditable Conduct.

Your actions described above, taken individually and/or cumulatively, are so serious as to justify dismissal. Accordingly, your breaches of the Standards of Professional Behaviour amount to gross misconduct.”

11. The Officer:

- a. accepted the facts of allegation 1 and the breach of the standards but says that this amounts to misconduct not gross misconduct;
- b. did not accept the facts or breach of the standard in allegation 2; and
- c. accepted the facts of allegation 3 but did not accept that this was a breach of the standard.

EVIDENCE

- 12. The Panel was provided with a hearing bundle comprising 96 electronic pages
- 13. The Officer did not give oral evidence.

14. The AA did not call any witnesses to give evidence. The statements of PS McNulty and PI Boroughs were agreed.
15. The Panel gave careful consideration to the submissions made on behalf of the parties alongside the Officer's :
 - i) Regulation 31 response; and
 - ii) the transcript of his interview held on 15 May 2025;

THE PANEL'S APPROACH

16. The Panel took account of the comprehensive opening note provided by the AA, the submissions by the parties and the advice provided by the Legally Qualified Chair ("LQC").
17. The Panel adopted a four-stage approach when considering the allegations:
 - a. first, to consider the facts of the case and to make its findings of fact in relation to each of the allegations;
 - b. second, to determine whether those findings of fact found constituted a breach of the relevant standards;
 - c. third, to determine whether the conduct found proved amounted to misconduct or gross misconduct; and finally,
 - d. dependent on those findings, to decide what the outcome should be.
18. In reaching its decision, the Panel has borne in mind that the burden of proof rests entirely on the AA and that the Officer does not need to prove anything.
19. The standard of proof is that applicable to civil proceedings, namely the balance of probabilities, which requires the Panel to determine whether it is more likely than not that the events occurred.
20. The Panel had regard to a framework of regulations and guidance, including:
 - a. the Regulations and the Standards of Professional Behaviour set out at Schedule 2;
 - b. the Home Office Guidance – Police Officer Misconduct (the "HOG"), particularly Chapter 1 which provides guidance on the Standards of Professional Conduct;

- c. the College of Policing's Guidance on Outcomes in Police Misconduct Proceedings (the "Guidance"); and
 - d. any relevant policies and procedures that apply.
21. Under Regulation 3(1) of the Regulations, misconduct is defined as a breach of the Standards of Professional Behaviour. Gross misconduct is defined at Regulation 3(1) as a breach of the Standards of Professional Behaviour so serious that dismissal would be justified.
 22. The Panel took account of the legal threshold for Discreditable Conduct established in *Chief Constable of Wiltshire v Police Appeals Tribunal [2012] EWHC 3288 (Admin)*. It noted that it need only be satisfied that the Officer's actions had the potential to damage the reputation of the police service, rather than requiring proof of actual reputational harm.
 23. The Panel noted that the allegation expressly states that:
"Your actions described above, taken individually and/or cumulatively, are so serious as to justify dismissal."
 24. In light of that formulation, the Panel considered not only whether each allegation amounted to misconduct or gross misconduct in its own right, but also whether the allegations, when considered cumulatively, were so serious as to justify dismissal. The Panel adopted that approach in accordance with the HOG, which permits multiple allegations to be considered together when determining the appropriate categorisation of conduct.
 25. The Panel also had regard to *Schodlok v General Medical Council [2015] EWCA Civ 769*, referenced and applied in *Ahmedsowida v General Medical Council [2021] EWHC 3466 (Admin)*, in which the Court of Appeal recognised that, whilst cumulative findings may in some cases elevate seriousness, findings which are not individually serious do not automatically become serious when taken together
 26. In making its determination, the Panel considered the totality of the evidence and submissions presented. While this determination states the main conclusions reached by the Panel, it does not deal with each and every aspect of the evidence or submissions made.

FINDINGS OF FACT

Allegation 1- Data at home address

30. The Officer accepts the factual particulars of this allegation. The Panel therefore finds the **facts proved**.

Allegation 2 - Non-BTP handcuffs

31. The Officer denies the allegation. The Panel was conscious that the stem of the allegation was not simply that the Officer purchased or used privately owned handcuffs. The allegation is that:
- "Whilst a serving constable, you disregarded the orders and instructions of the British Transport Police in that..."*
- thereafter setting out the particulars relied upon.
32. The Panel accepts that the facts at paragraphs (a) and (c) are established, namely that the Officer purchased privately owned folding or hinged handcuffs and took them on operational duties.
33. However, proof of those factual matters does not of itself establish the allegation. The question for the Panel was whether those actions amounted to a disregard of orders and instructions of the BTP.
34. The AA relied upon the Patrol and Parade Standards Policy. Having reviewed that policy, the Panel noted that the version contained within the bundle was version 3.4 dated November 2025. That version post-dates both the relevant events and the Officer's interview. The Panel was therefore not satisfied that it was the policy in force at the material time.
35. The version control record shows that Superintendent Alderson was the originating author of the policy when first produced in 2022. As Superintendent Alderson was a member of the Panel, the parties were advised that he had not provided any evidence, information or explanation concerning the policy beyond the material contained within the hearing bundle, thereby avoiding any potential conflict arising from his earlier authorship.
36. In any event, the policy merely refers to BTP-issued handcuffs as part of an officer's personal issued equipment. It does not expressly prohibit the

purchase, possession or operational use of privately owned handcuffs. Nor was the Panel taken to any policy, order or instruction in force at the material time requiring privately owned handcuffs to be registered with BTP.

37. Accordingly, whilst certain factual particulars are admitted or proved, the Panel was not satisfied on the balance of probabilities that the Officer disregarded any order or instruction of BTP. The Panel finds the **facts not proved**.

Allegation 3 -photograph sent to former partner

38. The Officer accepts the factual particulars of this allegation. The Panel therefore finds the **facts proved**.

STANDARDS OF BEHAVIOUR

39. Having found these facts proved, the Panel proceeded to determine whether this conduct constituted a breach of the relevant standards.

Allegation 1- Data at home address

40. The Officer accepts that he breached the Standards of Professional Behaviour of Confidentiality and Discreditable Conduct. Having considered the evidence the Panel finds that these standards were breached.

Allegation 3 -photograph sent to former partner

41. The Officer denies a breach of the Standard of Professional Behaviour of Discreditable Conduct. His position was that the image did not identify the injured person, showed only an unidentified individual at the scene of a road traffic collision, was sent to a single recipient and did not disclose the individual's identity or location. He therefore contended that the conduct did not discredit the police service or undermine public confidence in policing.
42. The Panel has carefully considered that submission but does not accept it. The relevant question is not whether actual reputational harm was caused but whether it had the potential to damage the reputation of the police service.
43. The Panel finds that the Officer deliberately took a photograph of an injured member of the public while dealing with a policing incident and then deliberately transmitted that image using a personal mobile telephone for a private purpose. Members of the public are entitled to expect that officers will treat information and images obtained whilst carrying out their duties with

appropriate professionalism. The Panel is satisfied that, if the circumstances became known to a reasonable member of the public, there would be a real potential for public confidence in the police service to be undermined.

44. Accordingly, the Panel finds that the conduct breached the Standard of Professional Behaviour relating to Discreditable Conduct.

MISCONDUCT

45. Having determined breaches of the Standards of Behaviour, the Panel assessed the seriousness of the conduct by reference to culpability, harm, aggravating factors and mitigating factors before standing back and considering the matter in the round.

Allegation 1- Data at home address

46. As to culpability, the Panel finds this to be at the lower end of the spectrum. The conduct was not deliberate, planned or motivated by personal gain. There is no evidence that the Officer intentionally retained the material for any improper purpose. However, the conduct was reckless. The Officer was aware of his responsibilities concerning the handling and storage of police information and should reasonably have foreseen the risks associated with retaining police documents and personal data at his home address over an extended period.
47. As to harm, the Panel finds that actual harm was low. There is no evidence that the information was accessed, disseminated or misused by any third party. Equally, there was no identified compromise of any investigation. Nevertheless, the potential harm was more significant. The documents contained personal information relating to members of the public and there was a clear risk that confidentiality could have been compromised. There was also a risk of reputational harm to the police service had the information been disclosed.
48. As to aggravating factors, the Panel notes that a number of separate items containing police information were retained and that some remained at the Officer's home address for a considerable period. The conduct therefore cannot properly be characterised as a single isolated lapse.
49. As to mitigation, the Officer made full admissions, accepted responsibility for his actions and acknowledged that he had failed to comply with the standards expected of him. The Panel has also taken account of the Officer's personal

circumstances and wellbeing at the material time insofar as they may have affected his judgment and organisational abilities. There is no evidence of deliberate misuse, personal gain or malicious intent.

50. Considering all of those matters in the round, the Panel concludes that the conduct was sufficiently serious to justify disciplinary action and therefore amounts to misconduct. However, having regard to the relatively low culpability, the absence of actual harm, the absence of any improper motive and the substantial mitigating features, the Panel is not satisfied that the conduct was so serious as to justify dismissal. It therefore does not amount to gross misconduct.

Allegation 3 -photograph sent to former partner

51. As to culpability, the Panel finds culpability to be moderate. Unlike Allegation 1, the conduct was deliberate. The Officer intentionally took the photograph and intentionally transmitted it. However, the Panel accepts that the conduct was not motivated by malice, personal gain or any intention to ridicule or exploit the injured person.
52. The Panel also takes account of the particular personal pressures the Officer was experiencing at the time, which provide important context to his decision-making, although they do not excuse the conduct. Those circumstances reduce the Officer's blameworthiness to some degree but do not alter the fact that the taking and transmission of the image were conscious and deliberate acts.
53. As to harm, the Panel finds that actual harm was low. There is no evidence that the injured person was identified, that the image was disseminated further, or that any complaint arose from the disclosure. However, there was clear potential harm both to public confidence and to the reputation of policing. Public confidence depends upon victims and members of the public having trust that officers will treat them and information obtained in the course of duties appropriately.
54. As to aggravating factors, the Panel notes that the taking and sending of the image was intentional and involved an injured member of the public encountered during a policing incident.

55. As to mitigation, the Officer made full admissions, accepted responsibility for his actions and demonstrated insight into the inappropriateness of the conduct. The Panel also takes account of the fact that the Officer took steps to minimise the risk of identification. The injured person's face was not shown, the image was sent to a single recipient and there was no onward dissemination.
56. Considering all the circumstances, the Panel concludes that the conduct was sufficiently serious to justify disciplinary action and therefore amounts to misconduct. However, having regard to the limited actual harm, the low likelihood of further disclosure, the absence of any improper motive and the mitigating features identified above, the Panel is not satisfied that the conduct was so serious as to justify dismissal. It therefore does not amount to gross misconduct.

Cumulative misconduct

57. Having found that Allegations 1 and 3 individually amount to misconduct, the Panel went on to consider whether, taken cumulatively, the conduct was so serious as to justify dismissal. In carrying out that assessment, the Panel considered the overall seriousness of the conduct, including the combined culpability, harm, aggravating factors and mitigating factors arising from both matters.
58. The Panel recognised that there were two separate breaches of the Standards of Professional Behaviour involving the handling of information and material obtained in the course of policing duties. That was an aggravating feature. However, the Panel also noted that neither matter involved dishonesty, personal gain, malicious intent, actual harm to any member of the public, or any deliberate abuse of police powers. In both allegations there were substantial mitigating features, including admissions, insight and acceptance of responsibility.
59. Considering the case as a whole, the Panel concluded that the cumulative seriousness of the conduct did not reach the threshold at which dismissal would be justified. Accordingly, whilst the Panel finds that Allegations 1 and 3 amount to misconduct, whether considered individually or cumulatively, it does not find that they amount to gross misconduct.

OUTCOME

60. Having determined the facts and associated misconduct, the Panel heard submissions from the parties regarding outcome. The Panel had sight of the Officer's service record and was provided with positive testimonials.
61. Mr Barham took the Panel through the Guidance and identified aggravation and mitigating factors. He submitted that the appropriate outcome should be a final written warning for 2 years.
62. Ms Zeffman submitted that the appropriate and proportionate outcome should be a written warning for 18 months. She submitted that the Panel should take into account the difficult period of time in the Officer's life, the impact this had on him, his early admissions and remorse, and that prior to these matters he had no other findings of misconduct.
63. In considering the outcome, the Panel bore in mind the purpose of the police misconduct regime:
 - i) To maintain public confidence in, and the reputation of, the police service.
 - ii) To uphold high standards in policing and deter misconduct.
 - iii) To protect the public by preventing an offending officer from committing similar misconduct again by excluding them from the police service.
64. In determining the appropriate disciplinary action, the Panel had regard to the Guidance including the need to
 - (i) assess the seriousness of the misconduct by reference to:
 - (a) the officer's culpability for the misconduct;
 - (b) the harm caused by the misconduct;
 - (c) the existence of any aggravating factors; and
 - (d) the existence of any mitigating factors;
 - (ii) keep in mind the purpose of imposing disciplinary action; and
 - (iii) choose the disciplinary action which most appropriately fulfils that purpose for the seriousness of the conduct in question (that is, to act proportionately).

Disciplinary action

65. The Panel considered all the submissions made by the AA and on behalf of the Officer concerning outcome. In reaching its decision, the Panel revisited its assessment of the seriousness of the misconduct, including culpability, harm, aggravating factors and mitigating factors, together with the Officer's personal mitigation and record of service.
66. The Panel first considered whether a written warning would be sufficient to meet those purposes. The Panel concluded that the misconduct was at the lower end of the misconduct spectrum. Whilst there were two findings of misconduct, there was no dishonesty, no personal gain, no malicious intent and limited actual harm. The Panel also took account of the significant mitigating features identified in its findings.
67. The Panel then considered whether it was necessary to impose a more severe outcome, namely a final written warning. Having revisited the seriousness of the conduct and all relevant circumstances, the Panel concluded that a final written warning would be disproportionate. The misconduct, whether considered individually or cumulatively, did not reach a level of seriousness requiring such an outcome.
68. The Panel is satisfied that a written warning properly reflects the seriousness of the misconduct, maintains public confidence in the police service, marks the importance of compliance with the Standards of Professional Behaviour and serves as an appropriate deterrent. **Accordingly, the appropriate and proportionate outcome is a written warning to remain in force for 18 months.**

Right of appeal.

69. In accordance with Regulation 43(2), the AA shall provide the Officer with a copy of this report and a notice of the right of appeal. The Officer is reminded he has a right to appeal to the Police Appeals Tribunal. ("PAT"). The PAT may increase or decrease any penalty or overturn our decision.

Ian Comfort
Panel Chair
6 July 2026