

PANEL DECISION

(Former) PC Gillian Davies

1. This decision relates to the discipline hearing for former Police Constable Gillian Davies held at North Wales Police Headquarters, Colwyn Bay, on Tuesday 4 August 2026.
2. The Panel was made up of presiding officer, Assistant Chief Constable Chris Allsop, supported by panel members Mr Andrew Parry and Mr Darren Campbell.
3. The Panel was supported by a Legally Qualified Advisor, Mr Andrew Findlay.
4. Neither former Police Constable Davies, nor her Federation representative elected to attend the hearing. Gillian Davies had already resigned from her position at North Wales Police and will be referred to as the former officer. Her last day of service was 2 August 2026. We have ascertained that the former officer had been given proper notice of the hearing and the allegations against her, and that she declined to attend the hearing. There is no indication that an adjournment would secure the attendance of the former officer. The former officer has responded to the case put in the Regulation 31 response and as such we have insight into the case which would be advanced were she present. Given these considerations, we are invited by the Appropriate Authority to proceed in the former officer's absence and the panel is content that the proper course was to do so.
5. The panel have approached their decision making by keeping in mind the purpose and character of disciplinary proceedings and consequently given due regard to both national and local guidance and policy.

The law in respect of factual determinations

6. The standard to which the Appropriate Authority (AA) 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.**
7. 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.
8. In determining whether the AA 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.**
9. The panel need to consider their purpose within the misconduct regime which is:
 - 9.1. *to maintain public confidence and the reputation of the police service; and*
 - 9.2. *to uphold high standards in policing and deter misconduct; and*
 - 9.3. *to protect the public.*
10. The panel received all the evidence in the case. Which included an initial bundle of evidence totalling 382 pages and supplementary character evidence totalling 26 pages.
11. No oral witness evidence was required, nor the attendance of any witnesses.

Credit/Good Character

12. There were no previous findings against the former officer.
13. Twenty character references were supplied.
14. Two commendations are recorded on the Record of Service.

Role of the panel

15. The role of the Panel has four steps, usually approached in two stages:

15.1. Stage 1

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

15.2 Stage 2

- 15.2.1 deciding what the outcome should be.*

16. The four steps should not be conflated. Each requires discrete findings with sufficient reasons.
17. The AA brings the allegations, and it is for the AA to prove them.

18. 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 (Home Office Guidance paragraph 9.10)

Findings of fact

19. The factual allegations are set out within the Regulation 30.
20. *The (former) Officer has breached the standards of professional behaviour in that:*
- 20.1. *She has used her personal mobile phone to communicate with individuals engaged in criminality both on and off duty.*
 - 20.2. *She has used her personal mobile phone to communicate sensitive police intelligence.*
 - 20.3. *She has failed to complete her mandatory Data Protection Training.*
 - 20.4. *She has used her single user logon to access the Niche RMS system for non-policing purposes system.*
21. *On 15 November 2017, the (former) Officer told SW that a member of the public was wanted for arrest.*
22. *On 10 June 2018, the (former) Officer told SW that there was ‘a scouse male in number one bad news!’*
23. *On 26 June 2018, the (former) Officer had a message conversation with SW about nominals in which she speaks of them in derogatory terms.*
24. *On 17 August 2018, the (former) Officer told SW that ‘car stolen by your neighbour!’*
25. *On 3 October 2018, in a message conversation with SW the (former) Officer revealed details about activity at a neighbour’s address and confirmed the identity of individuals that had been arrested and the offences that they had been arrested for.*

26. *Whilst on duty between 14:24 and 14:27 on 11 March 2019, the (former) Officer used her single user logon to access the Niche RMS system to search for an address (A) on the street of her home (YY) and to open the RMS Masterfile for the occupant of the address.*
27. *On 6 September 2019, whilst on duty between 15:09 and 15:12 the (former) Officer used her single user logon to access the Niche RMS system to search for the address of her next-door neighbour (B) and to open a crime occurrence. She then conducted a search for an address (A) on the street (YY) and opened the Masterfile for the resident. She then opened a further crime occurrence and a further occurrence enquiry log. She then searched for another address (C) on the street of her home and opened the Masterfile for the resident.*
28. *In 2020, the (former) Officer separated from her partner, Mr S, she notified the North Wales Police Vetting Department of this change in personal circumstances, and on 13 March 2020, informed them that she had moved to an address (YY).*
29. *On 1 May 2020, the (former) Officer asked SW to photograph a vehicle that had been parked outside. The (former) Officer then disclosed that the male was not wanted but did need to be ‘stop searching for drugs.’*
30. *Whilst off duty between 13:26 and 13:29 on 2 January 2021, the (former) Officer used her single user logon to access the Niche RMS system to search for an address (A) and opened the resident’s Masterfile. She then opened a crime occurrence followed by opening a further resident’s Masterfile. She then opened a crime occurrence.*
31. *Whilst on duty on 17 January 2021 between 09:24 and 09:30 the (former) Officer used her single user logon to access the Niche RMS system to conduct a detailed search for the previous resident of YY. She then opened a crime occurrence in relation to them. She then opened a second crime occurrence in relation to them. She then opened a third crime occurrence in association with them.*

32. *On 12 September 2021, the (former) Officer was off duty and used her single user logon to access the Niche RMS system and to search for an address, she then viewed an offence linked with that address and then a person linked to that offence to find their telephone number. She then sent that person's mobile phone number to SW.*
33. *On 3 June 2023, the (former) Officer had a message conversation with GE. The conversation concerned the exercise of a warrant. The (former) Officer confirmed that the warrant would be exercised that day and sought information as to who would be present at the address.*
34. *On 22 May 2024, whilst on duty between 08:30 and 09:35 the (former) Officer used her single user logon to access the Niche RMS system to search to conduct a detailed find on the post code that contained YY. She then opened the Masterfile for YY, the Masterfile for an occupant of that address and then her own Masterfile. She then opened the Masterfile for three separate occupants of YY. Finally, she opened a crime occurrence that related to those occupants.*
35. *The (former) Officer used her single user logon to access the Niche RMS system to search police systems to access the Masterfile for Mr M on four occasions:*
- 35.1. *28 February 2024;*
- 35.2. *29 April 2024;*
- 35.3. *30 August 2024; and*
- 35.4. *29 September 2024.*
36. *The (former) Officer had made two payments to Mr M (a tradesperson) of £1,300 on 2 February 2024 and £1,600 on 12 July 2024).*
37. *On 22 May 2024, the (former) Officer used her single user logon to access the Niche RMS system to research her previous partner Mr S.*

38. *On 25 August 2024, whilst on a rest day, the (former) Officer used her single user logon to access the Niche RMS system to access Icad event Q128304 sixteen times. The Icad related to a resident on the street of her home address YY.*
39. *The (former) Officer used her personal mobile telephone to communicate with members of the public about policing matters:*
- 39.1. *Between 2019 and 2021, the (former) Officer communicated with ZD via WhatsApp. During these conversations the Officer would ask ZD for information. In order for that information to be provided the Officer would reveal the details of vehicles, people or incidents that were of interest to the police.*
- 39.2. *The (former) Officer communicated with JD via WhatsApp. During these conversations they would discuss if people were still 'wanted' and whether people had been involved in criminality e.g. burglary or taking*
- 39.3. *The (former) Officer communicated with GE via WhatsApp. During these conversations she would provide information to him about whether a warrant had been executed and what the impact of that would be.*
40. The following considerations are relevant:
- 40.1. There is no CCTV or audio evidence in this case.
- 40.2. The evidence is provided by technical examination and analysis of information systems and from mobile data. It is both clear and reliable.
- 40.3. The breaches are multiple, across various subjects and the behaviour sustained.
- 40.4. The behaviour is admitted as follows, though the former officer does not accept that it amounts to gross misconduct she accepts that it does constitute misconduct:

- 40.4.1. Paragraph 20.1 is accepted by the officer. She did not realise using her personal phone for work purposes was forbidden. The officer did not engage with criminals on any personal level at any time.
- 40.4.2. Paragraph 20.2 is accepted by the officer. However, she did not intentionally use her personal phone to communicate sensitive intelligence.
- 40.4.3. Paragraph 20.3 is accepted by the officer. She was not aware that she had failed to complete her data protection training. She received numerous NCALT requests which she found difficult to keep on top of.
- 40.4.4. Paragraph 20.4 is accepted by the officer.
- 40.4.5. Paragraph 21 is accepted. Former PC Davies intended to go and arrest the wanted person. The former officer asked them not to tell anyone, so the wanted person did not have the heads up that the police were coming. She did not think she was doing anything wrong at the time as the police seek the public's help on social media for wanted people.
- 40.4.6. Paragraph 22 is accepted.
- 40.4.7. Paragraph 23 is accepted. The former officer states that she does not use the word in her day-to-day conversations and would never use it in any policing conversations.
- 40.4.8. Paragraph 24 is accepted by the former officer. She accepts she should not have worded the message as she did.
- 40.4.9. Paragraph 25 is accepted. She acknowledges that she should not have confirmed the arrest, she did not state what the person was arrested for.
- 40.4.10. Paragraphs 26 and 27 are accepted. The officer looked at the locations as she was looking to move to the area and had been living in fear after witnessing a burglary in her neighbour's house.
- 40.4.11. Paragraph 28 is accepted.

- 40.4.12. Paragraph 29 is accepted.
- 40.4.13. Paragraph 30 is accepted, though the former officer was unable to say why she had.
- 40.4.14. Paragraph 31 is accepted, and she conducted the checks as she was concerned as to why persons were frequently attending the property looking for the previous residents.
- 40.4.15. Paragraph 32 is accepted. She looked up the number and shared it as her friend's husband had passed away and the recipient was intending to visit as a welfare concern and friend, but had lost the phone number.
- 40.4.16. Paragraph 33 is accepted. The officer did inform them of the warrant, as they had been fearful and the former officer had offered to help. She felt telling them would not compromise the warrant as we were working for the same outcome.
- 40.4.17. Paragraph 34 is accepted. She did this to assist officers who had previously attended the address.
- 40.4.18. Paragraph 35 is accepted. He was a tradesman she had paid but was informed he had been arrested for drug driving, so intended to put a marker on his vehicle once he was disqualified. Each time she checked the case had not been finalised in court and she then forgot about him as she was busy in a new role.
- 40.4.19. Paragraph 36 is accepted.
- 40.4.20. Paragraph 37 is accepted. She accessed the address and noticed he was linked.
- 40.4.21. Paragraph 38 is accepted. She saw officers outside the address as she wanted to help with a missing person.
- 40.4.22. Paragraph 39 is accepted.
- 40.4.23. Paragraphs 39.1 and 39.2 are both accepted. She was attempting to locate a wanted person but on reflection, she accepted they were wrong.

- 40.5. The former officer accepts the terminology used to describe members of the public is inappropriate.
- 40.6. The former officer failed to complete mandatory data protection training including that which North Wales Police reminded all staff to complete during 2023, via both a message from the Chief Constable and by an email sent directly to all staff by the Senior Information Risk Owner (SIRO). The former officer did complete NCALT Data Protection Training in 2020 and has therefore completed some training in relation to using and protecting data within North Wales Police.
- 40.7. The Log On X-Screen for ICAD is clear and states *“Use of this site involves the electronic transmission of public safety information. Unauthorized use of this product and its information can lead to criminal prosecution.”*
- 40.8. The College of Policing Approved Professional Practice (APP) on sharing police information states that *‘sharing police information must be linked to a policing purpose.’* Such *‘purpose’* is defined within the APP.
- 40.9. North Wales Police Information Security Policy requires officers to ensure that any contact with members of the public that relates to policing is conducted on the officer’s police issue mobile phone. The use of personal mobile phones for such contact is forbidden.
- 41. The panel find that it is more likely than not from both the admissions of the former officer and the unchallenged written evidence that former officer Gillian Davies has behaved as alleged. In conclusion the panel find that, on the balance of probabilities, the allegations are proved.**

Breach of the Standards

42. The panel reminded themselves of their purpose within the misconduct regime, which is to:

- 42.1. *Maintain public confidence and the reputation of the police service;*
- 42.2. *Uphold high standards in policing and deter misconduct; and*
- 42.3. *Protect the public.*

43. The panel observed that the burden of proof rests throughout on the AA and that the standard of proof in these proceedings is the civil standard. In this case the panel have been invited to consider whether, or not, the matters alleged breached the standards of professional behaviour relating to *Confidentiality; Orders and Instructions; and Discreditable Conduct*.

Confidentiality

44. **On the balance of probabilities, the panel do find that the former officer has breached this standard.**
45. By acting in this way, the panel found that the former officer has not treated information with respect and has accessed and disclosed it whilst not in the proper course of police duties.
46. The panel found that the former officer used police systems to access information when there was no policing purpose to do so, shared policing information with members of the public when there was not a policing purpose to do so, and used police systems to access information that related to herself when there was no policing purpose to do so.

Orders and Instructions

47. **On the balance of probabilities, the panel do find that the former officer has breached this standard.**
48. By acting in the way that the panel has found that the former officer, in using her personal mobile phone to communicate with members of the public about policing matters, has deviated from force policy.

Discreditable Conduct

49. **On the balance of probabilities, the panel do find that the former officer has breached this standard.**
50. By acting in the way that the panel has found, this behaviour could discredit the police service or undermine public confidence in policing.
51. The former officer has engaged in behaviour that could damage her own reputation and harm the trust and confidence placed in North Wales Police and policing more generally, to safeguard sensitive information.

Level of Misconduct

52. It is alleged by the Appropriate Authority that the breach amounts to gross misconduct.
53. *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.

54. Having regard to the above and all of the matters received and considered, the panel find that, taken individually and/or collectively, this is a matter **that does fall within the definition of Gross Misconduct**.
55. This is because the conduct proven was deliberate, sustained and due to the impact (and potential impact) on public confidence and on the reputation of policing. Also importantly, the risk of harm to those directly affected by the former officer's behaviour. Full explanation of seriousness follows below.
56. This finding does fulfil the purpose of the misconduct regime which the Panel reminded themselves of when making this determination.

Outcome

57. The Panel considered all the submissions, the evidence and the record of service, and the College of Policing guidance on outcomes.
58. The Panel also considered again the purpose within the misconduct regime which is:
- 58.1. *to maintain public confidence and the reputation of the police service*
 - 58.2. *to uphold high standards in policing and deter misconduct*
 - 58.3. *to protect the public.*

Seriousness Assessment

59. In assessing the seriousness of the misconduct, the Panel have considered:
60. The former officer's culpability
- 60.1. In this matter, the allegations that the panel have found proven concern the direct conduct of the former officer.
 - 60.2. The former officer had a responsibility to act in line with the relevant standards, policies and guidance. And this applies on or off duty.
 - 60.3. Harm appears unintentional, based upon the evidence the panel has been presented with and without having the benefit of the former officer providing testimony, though she should reasonably have foreseen the risk of harm from her behaviour.
 - 60.4. The Panel notes that this case centres on the misuse of police computer systems and sensitive police information, which is a particular concern for the police service generally. There is both a public expectation and a legal requirement that information held for the purpose of policing should

be treated in strictest confidence, properly protected and used only for legitimate policing purpose. North Wales Police policy clearly sets out the expectations for all staff about Data Protection and Information Security.

60.5. The Panel noted that no evidence was offered to indicate that the conduct by the former officer was for nefarious purpose – such as financial gain or intended to assist criminal activity. The Panel also noted, that under no circumstances should anyone access or use police information for personal reasons, such as general curiosity or a desire to check on criminal activity near an officer's home. There should always be a specific and proper policing purpose for doing so. The Panel was clear that there was no legitimate policing purpose in this case, and the access was repeated and deliberate.

60.6. The Panel notes that factors in this case are more serious, including the onward disclosure of sensitive information and the breach of personal privacy. The risk of potential compromise to police investigations in terms of the information revealed about persons sought by the police or planned operational activity, is particularly pertinent to this case. There is incontrovertible evidence that on multiple occasions, sensitive information had been shared with members of the public, that could have comprised police investigations.

60.7. Culpability therefore falls at the **medium-high** level of seriousness.

61. The harm caused (and the risk of harm)

61.1. Harm does not need to be suffered by a defined individual or group to undermine public confidence, nor do the circumstances need to be known to the public, as the Panel recognise was present in this case. How such behaviour would be perceived by the public is relevant, irrespective of whether the behaviour is known about at the time.

- 61.2. The Panel recognise that maintaining the integrity of police information is critical to discharging the functions of an effective police service. The adverse impact on public confidence from both the unlawful accessing and sharing of information is serious. With this case, in particular, the sharing of sensitive information held the risk of significant harm being occasioned.
- 61.3. The Panel notes that the Code of Ethics refers to policing professionals respecting confidentiality in managing information and ensuring it is not accessed by unauthorised recipients, either on or off-duty. Specific reference is made of the need for policing professionals to protect police information and not ‘gossip... to anyone – including friends and family – who could contribute to the misuse of police information’.
- 61.4. There is a significant risk of reputational harm as the public would see this behaviour as unprofessional and it would undermine public confidence in the police service.
- 61.5. Current national scrutiny on policing conduct and behaviour, inevitably means that cases such as these significantly undermine public confidence in policing. The public rightly expect that any breaches of the high standards of ethical behaviour will be dealt with decisively and accordingly.
- 61.6. The harm and risk of harm in this matter therefore falls at the level of **medium-high** seriousness.

62. Aggravating factors

- 62.1. The behaviour was deliberate.
- 62.2. There are multiple proven breaches of the standards.
- 62.3. The behaviour is repeated and sustained over a period of time.

- 62.4. Behaviour continued after the former officer ought to have realised it was improper.
- 62.5. Significant deviation from instructions, whether an order, force policy or national guidance.
- 62.6. The scale or depth of local or national concern about this issue of information security.

63. Mitigating factors

- 63.1. The former officer made early admissions.
 - 63.2. The former officer displayed some genuine remorse and acceptance of responsibility for her actions.
 - 63.3. The behaviour appears misguided and centres on inappropriate use of police information systems. No evidence of malign intent.
 - 63.4. The Panel noted the limited amount of data protection training undertaken by the former officer and the responsibility of North Wales Police to ensure compliance in this regard.
64. In conclusion, the panel do find that culpability is at the level of medium-high and the harm (and risk of harm) is at the level of medium-high. Together with the aggravating and mitigating factors, **the seriousness overall is at the level of medium-high.**
65. The Appropriate Authority says that only a finding that the former officer is dismissed, had she still been serving, would fulfil the purposes of the disciplinary process.
66. The former officer admits the behaviour but has throughout maintained in writing that it does not constitute Gross Misconduct.

67. Having considered all the above matters and the available outcomes, the Panel firstly considered whether the less severe course of action was sufficient; in effect simply to record the finding.
68. The Panel reminded themselves of the purpose of the misconduct regime and recognise that the purpose of proceedings is not to punish the former officer.
69. The Panel are reminded that the police are in a privileged position of trust, and the public expect them to exercise their position appropriately and professionally.
70. The following considerations are relevant:
- 70.1. This case inherently incurs a significant form of harm – namely the adverse impact on public confidence in policing. The public expect that North Wales Police will treat their information securely and professionally. Staff are governed not only by legislation and policy in this regard, but also the standards of professional behaviour and the Code of Ethics.
- 70.2. The Panel found that the former officer posed a risk not only to the security of the information accessed for a non-policing purpose, but to the reputation of North Wales Police and the wider police service. This is equally applicable whether the behaviour was known to the public or not.
- 70.3. The significant risk of reputational harm, both to North Wales Police and policing more broadly, as the public would see this (proven) behaviour as unprofessional and it would undermine public trust and confidence, particularly with current national scrutiny on policing conduct and behaviour. A significant risk exists of undermining the trust and confidence of the public, should these matters not be dealt with robustly and appropriately.
71. There are no previous relevant allegations of misconduct brought to the panel's attention, and nothing of note that suggests the former officer is anything other

than of good character. Twenty-character references were supplied to the panel which provided testimony of that.

72. The panel noted the former officer's service record and substantial public service, totalling eighteen years, as well as the two commendations on her Record of Service, all of which is to her credit.
73. In terms of personal mitigation we have taken account of the decision in *R (on the application of Williams) v Police Appeals Tribunal and another* [2016] EWHC 2708 as to the weight to be given to personal mitigation in police misconduct proceedings.
74. With due regard to all the matters set out, the Panel do not consider that the less severe outcome is sufficient when considering the nature of the proven allegation, the purpose of the disciplinary regime and the protection of the public.
75. It is the Panel's finding that the proven conduct is of such a serious nature and reaches the relevant threshold, that only the more serious sanction is appropriate.
76. Consequently, it is the Panel's finding that, if the former officer was still serving, only **dismissal without notice** would fulfil the purpose of the misconduct regime.
77. The Panel directs that the Former Officer's details should be included within the Police Barred List (Regulation 3(2) of the Police Barred List and Police Advisory List Regulations 2017).
78. The Former Officer has a right to appeal in accordance with the Police Appeals Tribunal Rules 2020. Should the Former Officer wish to appeal she should provide notice of her intention to appeal to the Appropriate Authority within 10-working days of receipt of this written determination.

4 August 2026

Assistant Chief Constable Chris Allsop

Presiding Officer

Mr Andrew Parry

Panel Member

Mr Darren Campbell

Panel Member

Mr Andrew Findlay

Legally Qualified Advisor