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IN THE MATTER OF MISCONDUCT PROCEEDINGS CONCERNING:  
THE POLICE (CONDUCT) REGULATIONS 2020 (PCR) as amended by POLICE (CONDUCT)  
(AMMENDMENT) REGULATIONS 2024.

**THE CHIEF CONSTABLE OF BEDFORDSHIRE POLICE**

**-and-**

**INSPECTOR MOHAMMED NASAR**

**(Case reference: CM/252/24)**

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**Written Report Pursuant to S63(1) PCR 2020**

**Dated: 3<sup>rd</sup> March 2026.**

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## **Introduction**

1. An accelerated misconduct hearing was held in respect to Inspector Mohammed Nasar (the officer) on 26<sup>th</sup> February 2026.
2. The hearing was held at Lysander House, Bedfordshire.
3. This is a record of my determination on facts, conduct, severity and outcome.
4. As chair of misconduct hearings, I have delegated authority from the Chief Constables of Bedfordshire, Cambridgeshire, and Hertfordshire.
5. The hearing was recorded and this is the written report I am required to produce within 5 working days of the hearing.
6. The Appropriate Authority (AA) was represented at the hearing.
7. The officer was neither present nor represented.
8. It was established that the officer was not engaging with the misconduct procedures and he had been updated with dates and times of the hearing.
9. The hearing was a public hearing.
10. I received no applications for privacy or anonymity, and my rationale for a public hearing was recorded and provided to the Professional Standards hearings manager.
11. The Appropriate Authority outlined the schedule of contact made with the officer, to ensure that he was aware of the date and time of the hearing, and that the relevant papers and information required under the regulations had been brought to his attention.

12. I remind myself of the legal case of *R v Jones & Hayward [2002] UKHL 5* and *GMC v Adeogba and Visvardis [2016] EWCA Civ 162*.

The case of *Adeogba* being that the Chair's primary objective is the protection of the public and the public interest, and that the "*Fair, economical, expeditious and efficient disposal of allegations made against medical practitioners is of very real importance*" and that "*where there is good reason not to proceed, the case should be adjourned; where there is not, however, it is only right that it should proceed*".

*"There is a burden on all professionals subject to a regulatory regime, to engage with the regulator, both in relation to the investigation and ultimate resolution of allegations made against them. That is part of the responsibility to which they sign up when being admitted to the profession."*

13. In deciding whether to exercise my discretion to proceed in the absence of the officer, I balanced my responsibility for public protection and the expeditious disposal of the case, against the Officer's right to be present at the Hearing. I also gave regard to paragraph 106 of the Home Office Guidance 2020 which confirms:

*"The hearing may be conducted and concluded in the absence of the officer whether or not they are represented"*.

14. I was satisfied that all reasonable efforts had been made by the Appropriate Authority to notify the officer of the hearing details.

15. I was satisfied that the officer was supplied with the evidence and allegations against him, and that he was aware of the hearing date and details.

16. I was satisfied on the evidence presented on behalf of the Appropriate Authority, that the officer had of his own volition, elected to neither attend, nor be represented.

17. My decision was that the hearing would proceed in the officer's absence.

18. It was determined by the Appropriate Authority that:

- (i) There is sufficient evidence, in the form of written statements or other documents, without the need for further evidence, whether written or oral, to establish on the balance of probabilities that the alleged conduct constitutes gross misconduct;
- (ii) It is in the public interest for the officer to be placed on the Police Barred List without delay.

19. The above are known as "Special Conditions" and as they have been determined by the Appropriate Authority to have been met, this accelerated misconduct hearing is convoked.

#### **Allegations: Breaches of the Standards of Professional Behaviour**

20. The Appropriate Authority alleges that the officer breached the following Standards of Professional Behaviour, as set out in Sch 2 of the Police (Conduct) Regulations 2020:

- a) Honesty and Integrity**
- b) Authority, Respect and Courtesy**
- c) Orders and Instructions**
- d) Duties and Responsibilities**
- e) Discreditable Conduct**

It is contended, that if proven, the conduct set out below, breaches the above standards.

**Allegation 1 – Discreditable Conduct**

While serving as a Neighbourhood Policing Inspector, the officer behaved in a manner likely to bring discredit upon the police service, in that he engaged with sex workers as follows:

a) On the 18th of August 2024 and the 5th of December 2024, using his personal mobile phone, the officer contacted multiple telephone numbers associated with sex worker advertisements, making enquiries regarding services and pricing.

b) The officer then travelled to Harrow (London) on the 18th of August 2024, as evidenced by independent telecommunications, financial, and cell-site data.

c) He travelled to Milton Keynes (Buckinghamshire) on the 5th of December 2024, as evidenced by independent telecommunications, financial, and cell-site data.

**Allegation 2 – Authority, Respect and Courtesy; Duties and Responsibilities**

In engaging in the conduct described in Allegation 1, the officer behaved without respect and courtesy, and failed to fulfil his duties and responsibilities as a senior police officer, in that:

a) At the material times, he held operational responsibility for Operation Octans, a policing operation aimed at addressing the on-street sex trade and safeguarding vulnerable women in Luton.

b) His personal conduct was incompatible with the purpose, aims and ethical requirements of that role; and

c) This was despite having authored the Operation Octans Tactical Plan, which stated that the aim of the operation was to reduce “the harm and distress caused to residents whilst ensuring the safety and well-being of those being exploited for sex.”

**Allegation 3 – Orders and Instructions**

In engaging in the conduct described in Allegation 1, the officer failed to comply with lawful orders and instructions, in that his actions were contrary to relevant force policies and guidance, including:

- a) The Sex Worker Policy; and
- b) The Notifiable Associations Policy.

**Allegation 4 – Honesty and Integrity**

On the 22nd of October 2025, the officer failed to act with honesty and integrity:

- a) He denied, in a pre-interview prepared statement, personal involvement in the use of sex workers, which is inconsistent with telecommunications, financial and cell-site evidence obtained during the investigation.
- b) He asserted that the telecommunications, financial and cell-site material under investigation related to his attempts to identify brothels for targeting as part of Operation Octans. Operation Octans concerned on-street sex workers in Luton, whereas the material under investigation relates to brothels in Harrow and Milton Keynes. There are no auditable intelligence records, taskings or operational logs supporting the above assertion on BCH systems; and
- c) 18th of August 5th of December 2024 were non-working days for the officer, further undermining that explanation.

**The matters set out above are alleged to amount to gross misconduct and are so serious as to justify dismissal.**

### **The Chair's approach to proceedings**

21. I approach my decision making by keeping in mind the purpose of police conduct regulations:

- *Firstly, to protect public confidence in and the reputation of policing.*
- *Secondly, to maintain the high professional standards by demonstrating to other officers that misconduct will not be tolerated.*
- *Thirdly, to protect the public and/or officers and staff by preventing the officers from committing similar misconduct again.*

22. I have regard to Bolton v Law Society [1994] 1 WLR 512; and Chief Constable of Dorset v PAT, Salter Interested Party [2011] EWHC 3366 (Admin), applying the high standards of honesty and integrity expected of lawyers, to police officers.

23. I have regard to R(Green) v Police Complaints Authority [2002] UKHL 6 at [78], where Lord Carswell stated:

*'Public confidence in the police is a factor of great importance in the maintenance of law and order in the manner which we regard as appropriate in our polity. If citizens feel that the improper behaviour on the part of police officers is left unchecked and they are not held to account for it in a suitable manner, that confidence will be eroded.'*

24. I have regard to a framework of regulations and guidance, in particular:

- The Police (Conduct) Regulations 2020 as amended by the Police (Conduct) (Amendments) Regulations 2024, including and in particular the Standards of Professional Behaviour at schedule 2.
- Home Office Guidance 2020.
- The College of Policing Code of Ethics, and Ethical Principles 2024, which provides examples of what officers are expected to do and not to do and which I read in conjunction with schedule 2 of the Regulations.
- The definition of gross misconduct given at PCR reg 2(1) of the Regulations:

*“A breach of the Standards of Professional Behaviour, so serious that dismissal would be justified”.*

- The College of Policing Guidance on Outcomes in Police Misconduct Proceedings 2023 underpinned by S87 Police Act 1996.
- Council for Regulation of Health Care Professionals v GMC [2004] EWHC1850 at [24]:

*“Each case will depend on its particular facts and circumstances. Guidance cannot and should not prescribe the outcome for every suitable case”.*

**And;**

R (on application of the Chief Constable of Greater Manchester Police) v Police Misconduct Panel (Roscoe – interested party) 13th November 2018 per HHJ Pelling QC.

*“Persons to whom this guidance applies must have regard to the guidance in the discharge of their functions. There is, an expectation in case law that the process outlined in this guidance should be followed.”*

25. The burden of proof rests with the Appropriate Authority. The standard of proof in these proceedings is the ‘Balance of probabilities’ civil standard (reg 33(14)), which is a “single unvarying standard”, per Mitting J in IPCC v Harman [2008] EWHC 2191 (Admin), with no sliding scale.

26. I give regard to para 9.10 of the Home Office Guidance, which states:

*‘In deciding matters of fact, the persons conducting the misconduct meeting or hearing must apply the standard of proof required in civil cases, that is, the balance of probabilities. Conduct will be proved on the balance of probabilities if the persons conducting the meeting or hearing are satisfied by the evidence that it is more likely than not that the conduct occurred. The balance of probabilities is a single unvarying standard (i.e. there is no sliding scale). The seriousness of the allegation of misconduct and/or the seriousness of the consequences for the officer do not require a different standard of proof, merely appropriately careful consideration by the panel before it is satisfied of the matter which has to be established. The inherent probability or improbability of the conduct occurring is itself a matter to be taken into*

*account when deciding whether, on the balance of probabilities, the conduct occurred.'*

27. I consider the decision of Wyn Williams J, in *Chief Constable of Wiltshire v Police Appeals Tribunal (Paul Woollard Interested Party)* [2012] EWHC 3288 (Admin) and note that in order to prove a breach of the Standard relating to Discreditable Conduct, it is not necessary to prove that actual discredit has been brought to the police service; it is sufficient that the officer's behaviour had the potential to do so.

#### **Determination of Facts, Conduct and Outcome**

28. I approached the task on the following staged basis:
- i. First, to ascertain the factual allegations, whether admitted or found proven;
  - ii. Second, to determine whether based on those facts the officer has breached the standards of professional behaviour alleged.
  - iii. Third, if yes, to decide whether such breaches constituted gross misconduct.
  - iv. Fourth, dependent on findings under (ii) and (iii) above, to decide on the appropriate outcome.

#### **Submissions**

29. The Appropriate Authority presented their case, assisted with an opening note, setting out their position in respect to evidence, and alleged breaches of the Standards of Professional Behaviour. This was read into the record.
30. I received no submissions on behalf of the officer.

#### **Determination of Facts (Stage 1)**

31. I have read all of the evidential bundle provided by the investigating officer which outlines the evidence in this case.
32. The officer was also provided with the relevant bundle.
33. The officer did not provide a response.
34. The officer did not provide instruction to the Police Federation and therefore did not contend that his conduct amounted to misconduct, gross misconduct, or neither.
35. Having been presented with the evidence in this case, I considered whether the facts are proven by the Appropriate Authority, on the balance of probability.

#### **36. Allegation 1**

Having heard the evidence, I find that the officer breached this standard on the balance of probability. Through his engagement with sex workers, he has behaved in a manner which would discredit the police service and result in members of the public losing trust and confidence in the policing profession.

**The Appropriate Authority has proven a breach of this standard.**

**37. Allegation 2**

Having heard the evidence, I find that the officer breached this standard on the balance of probability. He failed to fulfil his duties and responsibilities as a senior officer, whilst holding a level of responsibility for ensuring the safety and well-being of those being exploited for sex.

**The Appropriate Authority has proven a breach of this standard.**

**38. Allegation 3**

Having heard the evidence, I find that the officer has breached this standard on the balance of probability. He failed to comply with orders and instructions, in particular policies regarding sex workers and notifiable associates.

**The Appropriate Authority has proven a breach of this standard.**

**39. Allegation 4**

Having heard the evidence, I find that the officer has breached this standard on the balance of probability. He provided a dishonest account regarding his conduct to investigating officers.

**The Appropriate Authority has proven a breach of this standard.**

**Determination of whether the facts proven amount to a breach of the Standard of Professional Behaviour (Stage 2)**

40. Whilst clear that I am determining breaches to the Police Conduct Regulations Standards of Professional Behaviour, I look to the Police Code of Ethics relevant at the time to assist in this assessment.

41. The College of Policing published the Police Code of Ethics, principles and guidance to officers. It is this guidance to officers that I draw upon and note general headings that officers are provided with:

***Courage** – making, communicating and being accountable for decisions, and standing against anything that could bring our profession into disrepute. Courage can be demonstrated by setting an example that officers are role models and consistently demonstrate professional behaviour or by seeking to maintain the confidence of the public served by the police through the way that officers conduct themselves.*

The officer has not demonstrated courage - He has failed to set an example and has engaged in conduct that brings the policing profession into disrepute.

**Respect and Empathy** - *encouraging, listening to and understanding the views of others, and seeking to recognise and respond to the physical, mental and emotional challenges that we and other people may face. This may be demonstrated by treating everyone with dignity and acting with respect where at all possible.*

The officer has not demonstrated respect and empathy - Given his senior role in policing, he knows the consequences of exploitation and sex work. By engaging in this conduct, he has failed to treat others with dignity and respect.

**Public service** – *working in the public interest, fostering public trust and confidence, and taking pride in providing an excellent service to the public.*

The officer has not demonstrated public service - His conduct was self-serving and is the antithesis of providing an excellent service to the public. His conduct damages the relationship of trust and confidence with the public.

42. I find the following standards of professional behaviour to be engaged in the proven allegations:

- A) **Honesty & Integrity**
- B) **Authority Respect and Courtesy**
- C) **Orders & Instructions**
- D) **Duties & Responsibilities**
- E) **Discreditable Conduct**

### Seriousness assessment (Stage 3)

43. I have regard to regulations 2(1) which states:

*“Gross misconduct means a breach of the Standards of Professional Behaviour that is so serious as to justify dismissal”.*

44. In coming to my determination, I have drawn upon the College of Policing guidance on outcomes in Police misconduct and I have followed the steps described.

45. I again take into account the purpose of police conduct regulations:

- *Firstly, to protect public confidence in and the reputation of policing.*
- *Secondly, to maintain the high professional standards by demonstrating to other officers that misconduct will not be tolerated.*
- *Thirdly, to protect the public and/or officers and staff by preventing the officers from committing similar misconduct again.*

46. In line with guidance, I consider culpability and, harm, and then matters which I find to have aggravated or mitigated the officer's conduct. I pay attention in particular to paragraph 4.15, which urges care to be taken regarding double counting.

**47. Culpability:**

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. 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.

Culpability will also be increased if the officer was holding a position of trust or responsibility at the relevant time. All police officers are in a position of trust, but an officer's level of responsibility may be affected by specific circumstantial factors, such as rank, their particular role and their relationship with any persons affected by the misconduct. This is an important element, given the officer's role.

- The officer's actions were intentional and deliberate.
- He could reasonably foresee the risk of harm to the reputation of policing.

**Culpability is HIGH.**

**48. Harm:**

As stated in the Guidance on outcomes:

*"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".*

- The actions of the officer undoubtedly undermine public trust and confidence.

**Harm is HIGH.**

**49. Aggravating factors:**

- There is ongoing national concern regarding misconduct within the police.
- There are multiple breaches of the Standards of Professional Behaviour.
- The officer's conduct is a significant deviation from instructions, whether an order, force policy, or national guidance
- This is further aggravated by the fact he authored the force's approach and held a degree of responsibility for tackling exploitation of vulnerable sex workers.

**50. Mitigating factors:**

- I acknowledge the officer had a period of absence from work during this process, along with some personal challenges that have been outlined by the Appropriate Authority.
- I have not been presented with any mitigating factors on behalf of the officer as part of this hearing
- I am not presented with any evidence of remorse or insight.

51. I find that these breaches of the Standards of Professional Behaviour are so serious as to justify dismissal, and therefore my assessment is:

**Gross Misconduct.**

**Outcome (Stage4)**

52. I again take into consideration the College of Policing guidance on outcomes in misconduct proceedings.

53. I have given careful consideration to the officer's Record of Police Service.

54. I do acknowledge the officer's contribution to policing as outlined in the documents I have been provided with. This includes a message of thanks from a member of the public in February 2017.

55. The officer was invited to provide PSD with any other material which he may have wished to include with his record of service - He did not respond.

56. Beyond the record of service, I received no personal mitigation and in its absence, I remind myself of the legal examples of Salter and Bolton, with regards to personal mitigation, and that it has limited weight.
57. Having used the college of policing guidance on outcomes in misconduct proceedings, underpinned by the code of ethics, to assess the conduct of the officer as **gross misconduct**, with both **culpability and harm assessed as high**, I adopt these considerations outlined in stage 3 to consider taking disciplinary action.
58. In doing so, I remind myself of the purpose of the misconduct regulations, and the fact that purpose is not solely to punish the officer.
- *Protect public confidence in and the reputation of policing.*
  - *Maintain the high professional standards by demonstrating to other officers that misconduct will not be tolerated.*
  - *Protect the public and/or officers and staff by preventing officers from committing similar misconduct again.*
59. Given the seriousness of the breaches of the standards of professional behaviour, the nature of the officer's conduct and to satisfy the purpose of the regulations my decision is that disciplinary action would follow.
60. My decision is that the most appropriate outcome is **dismissal without notice**.
61. It is in the public interest for the officer to be placed on the Police Barred List without delay.
62. The officer will be notified of this outcome within 5 working days along with right of appeal.

Assistant Chief Constable Vaughan Lukey