

**IN THE MATTER OF THE MISCONDUCT PROCEEDINGS UNDER THE POLICE
(CONDUCT) REGULATIONS 2020 (AS AMENDED BY THE POLICE
(CONDUCT) (AMENDMENT) REGULATIONS 2024)**

BETWEEN

**THE COMMISSIONER OF POLICE OF THE METROPOLIS
(THE APPROPRIATE AUTHORITY)**

and

PC SULLIVAN (OFFICER CONCERNED)

PANEL FINAL DECISION

1. Introduction
 - 1.1 This is the written final decision in respect of the misconduct hearing for PC SULLIVAN (the Officer). The outline of the Panel's decision was provided to the Officers during the hearing.
 - 1.2 The misconduct hearing was held in public from 28 to 31 July 2026 at Palestra House, 197 Blackfriars Road, SE1 8NJ.
 - 1.3 A notice of hearing was published in accordance with the Police (Conduct) Regulations 2020 ('the 2020 Regulations').
 - 1.4 The Panel was chaired by Commander Colin Wingrove (Chair), with independent members Ms Joy Julien and Mr David Scott. The Legally Qualified Adviser (LQA) to the Panel was Ms Hilary Norris.
 - 1.5 The Appropriate Authority (AA) was represented by Ms Lissy Verrall-Withers (AA's representative) and the Officer was represented by Sergeant Andrew Swift, (Police Federation Representative).
 - 1.6 At the outset of its determinations, and throughout the hearing, the Panel has remained mindful of the overarching purpose of police misconduct proceedings, namely:
 - i. To maintain public confidence in, and the reputation of, the police service;
 - ii. To uphold high standards of professional conduct and deter misconduct;
 - iii. To protect the public.

2. Allegations

The factual allegations in this matter are as follows (taken from the Regulation 30 notice):

On 15th March 2025, you were on duty in a police vehicle with the registration number [REDACTED] ('the vehicle').

At approximately 21:30hrs, you were present in the [REDACTED] Road area of Carshalton attending an incident. You were in the vehicle at that time.

At approximately 21:36hrs, you collided with a parked Mercedes on [REDACTED] Road.

You were aware that you had done so.

This collision caused extensive damage to the rear of the vehicle.

You were aware that the collision had caused such damage.

You left the scene without reporting the collision or obtaining the details of the owner of the Mercedes, despite a statutory obligation to do so and in breach of the Police Driver and Vehicles Policy.

You later returned to the scene before reporting the collision.

At 23:06hrs, you recorded the following on the CAD:

"Came to to [sic] vehicle after call attended and noticed slight damage to bumper rear o/s scuffing – cosmetic damage – appears a car has potentially hit it. We have noticed it just now after dropping youth back to an address"

At 23:17hrs, you recorded the following on the CAD:

"Was no damage at the start of shift, definately [sic] happened whilst dealing at another incident"

You knew that such entries were false.

You knowingly provided this false account to your superior officer, Sgt James Stead, and to another officer, PC Charlie Preston.

3. Hearing/legal argument

- 3.1 This matter was case managed at a misconduct pre-hearing on 21 May 2026 attended by PC Sullivan, PC Sullivan's Police Federation representative PS Swift, and Ms Verrall-Withers for the Appropriate Authority. The Misconduct Hearing was set down for a notional four days from 28-31 July 2026, and was listed to the convenience of the officer, the witnesses and the representatives. The Chair (Mr S Akhbar) later became unavailable on the dates for which the Hearing was listed and he was replaced by Commander Wingrove. The other Panel members were Mr Scott and Ms Julien. The LQA was Ms Norris.

- 3.2 The Hearing was considered suitable to be heard in public. It was originally listed to be heard at Empress State Building, but the venue was subsequently moved to Palestra.
- 3.3 The Panel had before it a 262-page bundle, the Regulation 31 response, the IDR Analysis and an opening note from the Appropriate Authority (AA). The Panel had also had the opportunity to view and listen to body-worn video footage.
- 3.4 Attendance & representation of PC Sullivan – The Panel records that on the afternoon before the Hearing, PC Sullivan's Police Federation representative PS Swift, emailed the Case Manager to indicate that he did not have instructions and would be stepping down as PC Sullivan's representative. He nonetheless attended on the first day of the Hearing. When PC Sullivan arrived, on the face of it expecting to represent himself, they requested, and were given, time to discuss the case. They then applied for a further adjournment until the morning of Day Two.
- 3.5 The Panel was mindful that PS Swift was in a difficult position. He said he had tried to secure instructions, but PC Sullivan had not engaged with him. PS Swift was reluctant to continue at all if the adjournment was refused. The Panel was also mindful that PC Sullivan had been present at the pre-hearing. He did not give a satisfactory explanation for his failure to engage with his representative thereafter, despite knowing the Hearing was imminent. He arrived at the venue only very shortly before it was due to begin. Four witnesses were expected to give evidence, all of whom are serving officers.
- 3.6 Notwithstanding assurances from Ms Verrall-Withers that if the adjournment was granted, she was confident the Hearing could still be concluded in the time for which it was listed, the Panel was concerned that to lose an entire day, without good reason, was likely to jeopardise the listing. However, it was considered preferable for PS Swift to continue to represent PC Sullivan, and the Panel concluded that this could be achieved by dealing with the Regulation 30 allegations and the Opening Note, and then adjourning until Day Two, when the start time would be brought forward to 09.30. This would give PS Swift the opportunity to take instructions; he helpfully agreed to remain on the record, and the Panel proceeded accordingly.
- 3.7 Ms Verrall-Withers duly read the Regulation 30 allegations and opened the case by reference to her opening note, including the showing of extracts from body worn video footage. The first five paragraphs of the allegations were admitted, the remainder denied. Significantly, PC Sullivan denies knowledge of the collision while in [REDACTED] Road and denies knowing of the damage it caused.
- 3.8 On day two, the Panel heard from PS Andrews, Senior Forensic Collision Investigator Supervisor, who was called by the AA. [REDACTED]

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- 3.9 The Panel then heard from PC Rudman, the colleague who had been on duty with PC Sullivan on the night in question, PC Preston, Response Officer and PS Stead, Garage Sergeant. It was confirmed that all these witnesses were being called by PC Sullivan and not by the Appropriate Authority or the Panel. Consequently, PS Swift confirmed to the LQA that he understood he could not lead or cross examine these witnesses.
- 3.10 During PS Stead's evidence, an issue arose when he was invited by PS Swift to indicate whether he believed a driver would necessarily have known there had been an impact, in light of the damage to the car. Ms Verrall-Withers objected to this question as it called for speculation and, unlike PS Andrews, PS Stead was not being called as an expert witness. The LQA's advice, which was accepted by the Panel, was that the question could not be asked in that format, although the LQA also indicated that it was acceptable to ask PS Stead what had caused him to make a reference to mounting the kerb when he spoke to PC Sullivan at the BP garage.
- 3.11 After a slightly extended lunch break, PC Sullivan gave evidence. The Panel sat until just after 18.00 so that PC Sullivan could conclude his evidence and give instructions on submissions to PS Swift for the following morning. It was agreed that the parties would make oral, rather than written, submissions.
- 3.12 On day three, the Panel heard submissions from the Appropriate Authority. PS Swift had just begun his submissions when a fire alert started, followed by an evacuation of the building for around an hour. When the Hearing reconvened, PS Swift finished his submissions (confirming he was happy to continue from where he had left off) and the parties were released until day four. The Panel began deliberations.
- 3.13 On day four, the Panel concluded its deliberations. The Stage One decision with full factual findings and the Panel's assessment of the conduct as gross misconduct was given before lunch. The Panel adjourned so that PC Sullivan could give instructions to PS Swift. During the break, the Panel was informed that PC Sullivan had left the building and did not intend to return. The Panel reconvened and on legal advice, continued with the Hearing in PC Sullivan's absence, PS Swift having confirmed that he did not have instructions regarding any reason for PC Sullivan's non-attendance (and specifically there was no indication that PC Sullivan was a disabled person for whom reasonable adjustments should be made to enable his future participation). The Panel heard submissions as to outcome from the Appropriate Authority and (PS Swift also having no instructions on outcome) retired to reach a decision on outcome which was then delivered orally.

4. Evidence in the case

The chronology of the matter is as follows:

- 4.1 On 15 March 2025, PC Sullivan was on duty in a marked police vehicle, a Toyota car registration number [REDACTED]. At approximately 21:30, he and his colleague PC Rudman were in the [REDACTED] Road area of Carshalton attending an incident. PC Rudman got out of the vehicle to pursue a number of youths who had been reported for a disturbance in a local shop, leaving PC Sullivan alone in the car.
- 4.2 It is now accepted by both parties that PC Sullivan then reversed the car along [REDACTED] Road and, at approximately 21:36hrs, collided with a parked Mercedes. The collision caused damage to both vehicles.
- 4.3 PC Sullivan and PC Rudman subsequently left [REDACTED] Road in the police vehicle with one of the juveniles, who had been reported missing from an address in Epsom. While they were on their way to Epsom, PC Sullivan, who was driving, pulled over without explanation and went to the back of the car. When he got back in, he said words to PC Rudman to the effect of, "I think someone has hit the car". Not having seen the damage, according to his witness statement, PC Rudman nonetheless said that it should be reported.
- 4.4 When they arrived at the missing youth's home, PC Rudman got out of the car and PC Sullivan pointed out the damage to him. PC Rudman again suggested to PC Sullivan that he should report the damage to the car. PC Sullivan said he would do so. At 23.08 he made a CAD report to the following effect: "Came to the vehicle after call attended and noticed slight damage to bumper rear o/s scuffing – cosmetic damage – appears a car has potentially hit it. We have noticed it just now after dropping youth back to an address". In response to a question from the MetCC Dispatch Operator via the radio, "Was the damage there when they DI'd the car at the start of their shift?" his response was that there was "no damage at the start of shift, definitely happened whilst dealing at another incident".
- 4.5 PC Sullivan returned with the police car to Sutton Police Station, where PC Preston spoke to him over the radio. PC Sullivan told PC Preston that someone had crashed into the car while it was parked and unoccupied. PC Preston looked at the car in Sutton Police Station and noticed that the rear offside bumper was damaged, and part of the reflector was missing. He went to speak to PC Sullivan, who told him that he had parked his car partly on the pavement outside an address in [REDACTED] Road ([REDACTED]) and left it unoccupied. He then transported a passenger to Epsom, and on arrival there, noticed damage to the rear of the car. PC Sullivan told PC Preston that he had then returned immediately to Sutton Police Station. PC Rudman also confirmed that he had got out of the vehicle in which he and PC Sullivan were travelling and that while he was out of the car, PC Sullivan had reversed along [REDACTED] Road and parked up.

- 4.6 PC Preston and a colleague went to [REDACTED] Road. On arrival at the scene, they could see a Mercedes car parked outside numbers [REDACTED], which had fresh damage to its front nearside bumper and wheel arch. PC Preston also noticed (but did not move) part of a reflector similar to those found on a police car. This, and the difference in the location from where PC Sullivan had said the collision took place, caused PC Preston to become suspicious about how it occurred. PC Preston spoke to the owner of the Mercedes, who confirmed the damage was fresh and they did not know how it happened.
- 4.7 PC Preston radioed PC Sullivan again and told him he had found damage on a car in [REDACTED] Road. PC Sullivan replied that he was aware of damage to two cars in the road as he had had a look, but that the damage did not appear fresh. This increased PC Preston's suspicions further. PC Sullivan asked him whether he was being accused of damaging the vehicle. PC Preston told PC Sullivan that the owner was not accusing him, and returned to Sutton Police Station. He and his colleague informed first their line manager PS Pankhania and then traffic sergeant PS Stead of the situation.
- 4.8 At some point that night, PC Sullivan went into the sergeants' office at Sutton Police Station with the logbook of the car in question and informed PS Pankhania that damage had been caused to the vehicle, telling her this had occurred when the vehicle was stationary while he left it and attended a call.
- 4.9 At 23.39, PS Stead spoke to PC Sullivan, who told PS Stead that he had found obviously new damage to the car he was driving, and that he suspected it had happened while he was parked at a call. PC Sullivan described the damage to PS Stead as "scuffing and scraping". They arranged to meet midway between their two locations so that PS Stead could obtain further details. They met at around 00.20 at a BP garage. PC Sullivan told PS Stead again that he suspected the damage was caused while the car was parked and unattended in [REDACTED] Road. He maintained that he did not know how it had been caused but said he had noticed the damage when he returned to the vehicle at that call.
- 4.10 Although in the CAD and in their phone call, PC Sullivan had described the damage as "slight", PS Stead assessed it as "moderate", including "various scrapes, dents and cracks to the rear offside quarter". He was surprised by its extent, noting a large vertical tear to the rear bumper, a broken reflector, denting and a hole in the bumper with corresponding protruding plastic. He considered that PC Sullivan should have mentioned these details to him on the phone. In particular, the protruding plastic was relatively sharp on one edge. He would not have asked PC Sullivan to drive to meet him if he had realised this, and was only just satisfied that it was not likely to cause danger. PC Sullivan explained to PS Stead that he was unsure of Police Collision reporting procedures.
- 4.11 During their meeting, PS Stead also downloaded data from the Incident Data Recorder (IDR) in the car. PS Stead describes this as similar to an aircraft's black box. He noted that the device had recorded an event with a G force of 1.33 earlier in the evening on [REDACTED] Road. PC Sullivan said he did not

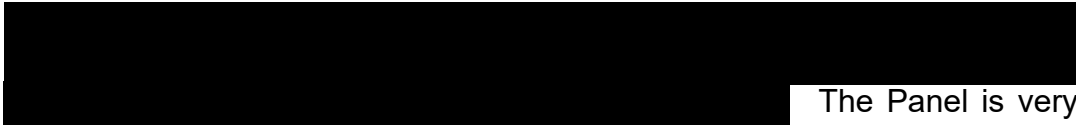
know what had caused that reading, so PS Stead asked him if he had driven over a kerb while parking at the location. PC Sullivan said he had, and when asked if it was a big kerb, replied, "You wouldn't want to jump over it". PS Stead took at face value PC Sullivan's indication both that the damage had been caused while PC Sullivan himself was away from the car and that PC Sullivan had hit a kerb while parking.

- 4.12 PS Stead judged from what PC Sullivan said to him that PC Sullivan did not have good knowledge of police collision reporting procedures and told him to re-read them. He did not, at that point, consider that PC Sullivan should be relieved from driving duties. However, later that night, on being contacted by PC Preston about the damage to the Mercedes on [REDACTED] Road, PS Stead decided to attend the scene himself.
- 4.13 Once at [REDACTED] Road, PS Stead activated his body worn video camera and took photographs. He could not see any high kerbs at the location where PC Sullivan's vehicle had parked earlier (numbers [REDACTED]). On checking outside numbers [REDACTED], he saw the Mercedes car previously observed by PC Preston and his colleague. He noticed there was clearly fresh damage to the Mercedes including a build-up of plastic adjacent to scrapes and transfer of red or orange paint. Mud had been displaced from the wheel arch and there was the shard of a red plastic reflector that PC Preston had noticed on his visit to the scene. PS Stead took this plastic piece and returned to Sutton Police Station where he found PC Sullivan's car. The piece of plastic from [REDACTED] Road perfectly matched the reflector on that car. Having spoken again to PC Preston and their colleague, PS Stead decided that PC Sullivan should be relieved from driving until further notice.
- 4.14 PS Andrews (who as noted above is employed by the MPS as a Senior Forensic Collision Investigator Supervisor) carried out his own investigations of the IDR and produced a report on 16 June 2025. His conclusion was that while PC Sullivan's police car was reversing along [REDACTED] Road, it had collided with the Mercedes.
- 4.15 On 19 September 2025, PC Sullivan underwent an interview in two parts under caution. In that interview, he accepted that the police car he had been driving on the night in question had collided with the Mercedes while it was being reversed along [REDACTED] Road.
- 4.16 Later in September 2025, in preparing his answers to questions asked by the Professional Standards Unit, PS Stead had cause to revisit the IDR. He noted on that occasion that PC Sullivan had returned to [REDACTED] Road on the way from Sutton Police Station to meet him at the BP garage. PC Sullivan accepts that he did so, and that he did not mention this to either PC Preston or PS Stead.

5. Findings

The Panel has had regard to all the evidence and the submissions in making its findings on the disputed facts as follows:

Witnesses generally

- 5.1 (i) *PS Andrews* – generally the Panel found PS Andrews a helpful and credible witness. He as an expert in the subject matter, with detailed knowledge and experience of appearing as an expert witness in court and at misconduct hearings; his credentials and conclusions were not challenged or doubted. He explained that he has been working in the area of collision investigation for 18 years and has undertaken a two-day course in the analysis of IDR data alone.
- (ii) PS Andrews had made an error, in the graph he produced for the Hearing, regarding the opening and closing of the car door. The Panel does not attach great weight to the fact that an error was made, because once it was identified, PS Andrews readily accepted it was his error and he rectified it using copies of the graph which were then redistributed to the parties and to the Panel.
- (iii) Generally, PS Andrews spoke helpfully to the body-worn footage and provided real detail about why the IDR evidence is important. He assisted the Panel in understanding what PC Sullivan's car was doing on 15 March 2025, through his explanation of the accelerometer. He was clear in his explanation of the analysis of the IDR data and was entirely satisfied that the IDR was in full functioning order on the night in question. He explained that the IDR would not illuminate the warning light on the device solely because of a peak of 1.2G or more, but because of a change of that magnitude. He was honest in setting out where the data might not be conclusive (e.g. in flagging that there was a margin of error of +/-2 mph when assessing the speed of the vehicle on impact) and openly and clearly differentiated between when he was giving his professional and personal views.
- (iv)  The Panel is very confident in the conclusions that PS Andrews drew, and is grateful for his experience.
- (v) The Panel notes it was PS Andrews' opinion that a driver in the circumstances would have been aware there had been a collision. He based this partly on his personal experience, which he said he had offered to assist the Panel. However, he also explained that he was satisfied of this fact to the higher (i.e. criminal) standard in his professional opinion: a professional driver would be using his mirrors while reversing in close proximity to cars parked along the roadside, and would have heard scraping noises as a result of the collision and/or a bang when the bumper cracked, even at the lower end of the speed range (i.e. five mph). There would have been a jolt in the police car at the point when it was a car's width from the kerb.
- (vi) PS Andrews noted that after the initial impact, the IDR shows the driver's door opens for three seconds and then closes; then the car moves forward

33 metres before stopping again and the door is opened once more, this time for 17 seconds. The damage to both vehicles was not insignificant and the damage to the police car specifically could not be explained by the car hitting a kerb. In any event, there was no high kerb near the point of impact (this latter point was indicated after PS Andrews had watched PS Stead's body worn footage during the Hearing). His conclusion ultimately was that it was "more than likely" that PC Sullivan was aware he had crashed the car. The Panel reaches its own conclusions in this regard however, independently of PS Andrews's views, whether personal or professional; we place weight only on his professional opinion, given the capacity in which he was called.

- 5.2 (i) *PC Rudman* – in his oral evidence, PC Rudman was consistent with his written statement. He said that the first time he was aware of any damage to the car was when PC Sullivan pulled over as they were travelling back to Epsom with the juvenile. It was at this point that PC Sullivan said the damage must have happened while he was parked.
- (ii) PC Rudman agreed with the proposition that the scene with the youths was somewhat chaotic initially. He said there were initially two or three of them and then perhaps six or seven (somewhat short of the number suggested by PC Sullivan, which was up to 15). In any event the youths were around the car when he and PC Sullivan returned with the missing 15-year-old whom they eventually took back to Epsom. There was "a lot going on". PC Rudman said specifically that nobody was arrested during the incident (which conflicts with PC Sullivan's evidence that he arrested the youth because he would not reveal his personal details; however he de-arrested him because the youth then did so). The youth was a tall person for his age, and difficult to get into the vehicle.
- (iii) PC Rudman said that PC Sullivan pulled over after about five minutes when they were driving the youth to Epsom, and got out, going to the back of the car. He said he was going to check something, but did not say what. The car then moved a little bit as though PC Sullivan was trying to open the boot, then PC Sullivan got back in and mentioned the damage. He did not describe it, but PC Rudman understood it to be something minor. They then drove for a further 15 minutes or so and when they arrived at the youth's house, PC Sullivan pointed out the damage. PC Rudman said that although it was dark there was lighting from street lights and he had a good view of the damage. He told PC Sullivan it should be reported; his view as an advanced driver himself would be that he would have described the damage to and sought advice from the sergeant before driving the car again.
- 5.3 (i) *PC Preston* – the Panel considered PC Preston to be a clear and convincing witness who spoke with clarity and credibility. The Panel understands that it may well have been a professional dilemma for him as to whether to report potential wrongdoing by a colleague (whom he clearly knew personally; he used PC Sullivan's first name). It is to PC Preston's credit that he

approached the sergeant about his suspicions so that they could be analysed further.

- (ii) We note that PC Preston and his colleague appear to have carried out a PNC check for the Mercedes at 00.23.45; by then PC Sullivan had already arrived at the BP garage for his meeting with PS Stead and therefore had already revisited [REDACTED] Road *en route* to that meeting. PC Preston was aware of the CAD report that suggested PC Sullivan had not seen the damage till he arrived in Epsom and PC Sullivan did not tell him at any point that night that he had subsequently gone back to [REDACTED] Road, on his own account trying to be “diligent”, yet failing to tell either investigator (PS Stead or PC Preston) about that fact. It was therefore understandable that PC Preston’s suspicions were enhanced when PC Sullivan told him he had seen damage to other cars and asked whether anyone was “accusing” him of anything. PC Preston knew that on PC Sullivan’s account, he had had no reason to be looking for damage to other vehicles before he left [REDACTED] Road.

- 5.4 (i) *PS Stead* – by the time of the Hearing, the Panel notes, PS Stead is some 20 months into his tenure, which means he had around four months’ experience by the date of the incident in question. The Panel evaluates his evidence, both at the time and now, in that context. He was not called as an expert witness. He has had training on IDR, although he indicated this was in the order of a couple of hours or half a day – nothing of the order of PS Andrews’ training.
- (ii) PS Stead produced a thorough report even though he was quite new to the role and was clearly keen to investigate the issues raised by PC Preston on the night. He was thorough and diligent at the scene in [REDACTED] Road, using his body-worn camera to good effect with a commentary as he moved along the road and then again back at Sutton Police Station.
 - (iii) PS Stead accepts he was naïve (indeed, he described himself as “quite negligent”) because he took what PC Sullivan told him at face value. He has engaged in self-reflection. He now acknowledges that his understanding of the IDR was lacking. The Panel considers that these acknowledgments made him both more credible and more reliable. His account, which the Panel accepts, was that he did a “double-take” when he saw the damage to the car. It was considerably more than he was anticipating, based on what PC Sullivan had said in the CAD and over the phone (we note that the CAD entry at 23.29.40 adds to the earlier description of “scuffing” and “cosmetic damage”: “Pol veh parked CAD 6808, upon returning back to veh found damage to veh. Superficial damage to nearside rear bumper”). PS Stead was not challenged that he had said to PC Sullivan that the police car had been given “quite a smack”, judging by the damage he saw at the BP garage.
- 5.5 (i) *PC Sullivan* – the Panel is mindful that in both his oral and written evidence, PC Sullivan indicated that he had personal issues at the time of the incident. He has not explained them in detail to the Panel, nor has he suggested that they clouded his judgment to the extent that they caused him to be untruthful

when discussing the incident with his colleagues. The Panel was also informed about a commendation for PC Sullivan.

- (ii) Overall, however, PC Sullivan was not a satisfactory witness. The Panel accepts the AA's submission that there have been a number of inconsistencies which in oral evidence were magnified rather than being resolved. We return to these later in this decision. However, broadly speaking, we note that his account has changed almost with each re-telling, particularly as to when and the extent to which he observed the damage to the police car. He refuted the suggestion that he was not in the heated part of the incident once he had dropped off PC Rudman and said he was in a hurry to get to him, but claimed he did so in a "safe" manner; and while he claims to have had the presence of mind to return diligently to [REDACTED] Road while making his way to see PS Stead at the BP garage, he failed to declare that he had done so, describing himself as "blasé" during that encounter with PS Stead.
- (iii) The Panel also accepts the Appropriate Authority's submission that PC Sullivan has claimed both that he did not get a good look at the damage and that it somehow worsened over the course of the evening as he drove from [REDACTED] Road to Epsom, then back to Sutton, then to the BP garage via [REDACTED] Road and then back to Sutton again – an explanation only offered during the Hearing, not in the interview under caution, and not put to any of the witnesses. We find, as submitted, that PC Sullivan cannot have this both ways. Either he saw the damage at an early stage and saw that it worsened, or he did not see it until later and hence could not have made that analysis.
- (iv) In any event, PC Sullivan was unable in cross examination to identify significant differences between the photographs taken at the garage and at Sutton Police Station; and regardless of the quality of the photographs, it is clear that the damage caused to the police car at the moment of impact was at least moderate (adopting PS Stead's word) because of the corresponding damage to the Mercedes and the broken reflector piece left in [REDACTED] Road.
- (v) Chiefly, in assessing his evidence, the Panel finds PC Sullivan's account lacking credibility as a result of the significant inconsistencies:
 - a) The Panel has noted that in the initial CAD, and in his oral accounts to PC Rudman, PC Preston and PS Stead, and when speaking to PS Pankhania, PC Sullivan claimed that the damage must have occurred when the car was unattended. His initial account was consistent that a third party must have collided with the police car while it was parked at the side of [REDACTED] Road and while he was attending to the incident with the youths. Yet if he saw the damage in [REDACTED] Road he did nothing to report it at the scene, while if he only saw it when he pulled over in Cheam Road, five minutes after leaving [REDACTED] Road, and said to PC Rudman that he thought someone had hit the car, again he did not call up on the radio to report it, whether to ask for other officers

to go to the scene to investigate or to be alerted to be looking out for a perpetrator.

- b) PC Sullivan now says that this is because he was not aware of damage to the police car at the time while he was in [REDACTED] Road. This is directly inconsistent with what he said in his interview under caution in September 2025, to which we return below; but it is also inconceivable to the Panel that as an experienced police driver, he could have felt a jolt and got out but failed to notice the damage in the 17 seconds while he was out of the car. He was under street lights, the same conditions PC Preston had when he spotted the Mercedes damage when driving in to [REDACTED] Road. Even if that was somehow possible, it is implausible that PC Sullivan would have remained oblivious to the fact that he had caused it, either at the time or once he became aware of the matching damage to the Mercedes when he returned to [REDACTED] Road *en route* to PS Stead. It is also incredible that he would have felt a bump on the back of the car but then glanced only at the side when he opened the door.
- c) In his interview, PC Sullivan claimed that there was no street lighting in [REDACTED] Road on the day of the incident and that it was “pitch black” when he checked behind him after the “bump” on the back of the car. While the Panel accepts it was dark (being just after 9.30 pm on a March night), there was street lighting; this much is evident from the body-worn footage. PC Sullivan also claimed that he had looked at every single car along the road and had noticed that “every other car has got a mark on it”. He claimed he was looking because he suspected that his car had been damaged and was looking for the vehicle that had hit his car. He could not have seen any such damage if the street was indeed “pitch black”.
- d) In oral evidence, PC Sullivan said that he had noticed what he described as “historical damage” to the police car (from which we infer wear and tear that would not require reporting) while still parked in [REDACTED] Road and that this was what he was referring to in the interview. However, the interviewer was clearly referring to the damage being investigated i.e. fresh damage from the night of 15 March.
- e) PC Sullivan also said in interview that when he returned to the car with PC Rudman and the youth that they were taking to Epsom, “a lot of [his] colleagues” had torches on and he noticed damage on the car. He was asked why he did not check it, and he replied that he had done so. He confirmed once more (as he had in the CAD) that the damage had not been there at the start of the shift. He then also appeared to suggest that he had seen the damage when he got “outside the front driver’s door”, while saying that thereby he had only seen “a small portion”,

though going on to say there was “deformation of the bumper”. He claimed that he had made a mistake in saying to PC Preston that he only noticed the damage when he arrived at Epsom and that he should have said he noticed it on [REDACTED] Road and should have reported it. He sought to explain that the reason he did not do so was out of concern for his, PC Rudman’s and the juvenile’s safety. As noted above, this further underlines the fact that he was talking about fresh damage and not “historical” wear and tear.

- f) This also conflicts again with the oral evidence he gave, which was that he had no cause to observe the rear of the vehicle on returning to it; his focus was on keeping himself and PC Rudman safe and coming away from the situation in a safe manner. He had no reason to give the car another look or to suspect any damage had been caused to it. He repeated in cross examination that he had not seen the damage while he was in [REDACTED] Road because if he had, he would have reported it.
- g) The Panel notes that according to the IDR, on the second occasion PC Sullivan stopped in [REDACTED] Road there was a period of 17 seconds from the door closing and reopening. PC Sullivan confirmed at the Hearing that during that 17-second period, he got out of the car. We infer that he had more than enough time to have walked to the back of the Toyota and looked at the damage, either with a torch or with the light from his phone, even if the street had been genuinely “pitch dark”. Indeed, we can think of no other explanation for what he was doing at that time. The Panel finds his assertion that it was only when he was made aware of the vehicle photographs for these misconduct proceedings that he was aware of the bumper deformation both incredible and inconsistent with his later account, to which we return below. Indeed, we note that in his witness statement under caution, he said that he walked up [REDACTED] Road towards the junction to try and establish how the incident may have occurred.
- h) The suggestion to PS Stead that the “impact” felt on the night could have been caused by hitting a kerb is entirely implausible. As was put in closing for the Appropriate Authority, it is now undisputed that the “impact” was not with a kerb but with a car. If PC Sullivan had been looking in his mirrors at any point, he cannot have failed to see the Mercedes, either before or after he hit it. The height of kerbs around the [REDACTED] Road area is irrelevant. The kerb – even if five inches as PC Sullivan claimed in his email of 20 September 2025 to Mr East at Professional Standards - could not have caused the damage to the police car, and there is no evidence of any kerb being so high that “you wouldn’t want to jump over it”. The loosely-draped measuring tape in photographs taken by PC Sullivan suggests at its highest the kerb was three to four inches. PC Sullivan was not able to demonstrate in

interview (and did not attempt to explain in the Hearing) the location of a high kerb that might have given rise to the IDR reading.

- i) Again as PS Andrews said in his expert view, the IDR spike - as we now know - was caused by the police car hitting the Mercedes, not a kerb. He pointed out that the point of impact with the Mercedes is a car's width from the nearest kerb and therefore when PC Sullivan pulled forward and looked back, the only thing that would have been behind him was the damaged Mercedes. It is implausible that he would not have seen the damage to either car following the jolt in those street lighting conditions and indeed, as we have noted elsewhere, PC Sullivan has been most inconsistent as to whether he did see damage to the police car at the time when he was still in [REDACTED] Road.
- j) The Panel also notes Paragraph 7 of the Regulation 31 notice in which PC Sullivan says, "He was performing a manoeuvre in the dark whilst responding to an incident, and thought that he had hit a kerb, nothing more". However, on his own account, he did not think it was a kerb, as has been noted, this was raised for the first time by PS Stead as an explanation for the IDR reading while he was still under the impression that the cause of the damage was a third party hitting the car while the ignition was off as per PC Sullivan's initial accounts to multiple recipients.
- k) In interview, PC Rudman's witness statement was put to PC Sullivan and in particular the point that he had stopped the car on the way to Epsom and got out, then told PC Rudman that he thought someone had hit the car. PC Sullivan said that he could not remember stopping the car and saying anything like that to PC Rudman.
- l) In oral evidence however, PC Sullivan gave a detailed account of stopping in Cheam Road and his reasons for doing so. He said that after driving for around five minutes he saw "something flapping" and kept an eye on it, later changing this to say his use of the word "flapping" was wrong; he should have said that he looked in the mirror and could see that the bumper on one side was "deformed" compared to the other side. He decided to stop the car outside a Shell garage and went to open the boot. He put the lights on (and said there were significant and better street lights all the way down the road and the petrol station was well-lit) and checked the boot, and there was damage. Though he claimed the damage was not to the extent displayed in the later photographs, he agreed there was a crack in the bumper. He told PC Rudman that he thought someone had damaged, or hit, the car. He accepted that once he had seen this quite significant damage, he should have reported it then. In his Regulation 31 notice he claims that "as soon as he became aware of the damage, he followed protocol". On any analysis, this is not true because he did not report the damage while parked at the side of

Cheam Road. PC Sullivan also accepted in oral evidence that he had subsequently used the “wrong terminology” over the radio for the purposes of the CAD. The Panel notes that the wording on the CAD is very specific and appears to be verbatim, and considers it is likely to reflect what PC Sullivan said to the operator.

- m) In oral evidence, PC Sullivan also described how he returned to [REDACTED] Road while en route to meet PS Stead later that evening. He claimed that while there, he also saw the damage on the Mercedes and a gap in front of it where he had made the manoeuvre. He continued on his way to meet PS Stead but made no mention at all of seeing the damaged Mercedes in [REDACTED] Road right next to where he had felt an impact.
- n) The Panel considers it extraordinary that PC Sullivan would have diverted to [REDACTED] Road for the express purpose of carrying out his own “diligent” investigation but would have then failed completely to give PS Stead information in that regard which might have assisted in any associated criminal investigation, if the damage both to the police car and to the Mercedes had truly been caused by a third party. When asked why, PC Sullivan stated he had not been asked.
- o) The Panel finds this behaviour in withholding key evidence, and not making the connection between the jolt or bump in [REDACTED] Road, damage found to the police car and damage seen to the Mercedes, was a deliberate choice made by PC Sullivan. His apparent enthusiasm for PS Stead offering the kerb explanation on examination of the IDR data underlines this, as PC Sullivan should then have told PS Stead everything he knew, but did not, and he was unable to offer a reasonable explanation for that failure when pressed by the Panel.
- p) In his interview, PC Sullivan accepted that PS Stead had shown him the damage while they were at the BP garage and had a discussion with him about it. However, he maintained that he was not paying “huge amounts of attention” and had only “sort of glanced” at it. He accepted, then denied, then accepted again having walked the full length of the car with PS Stead, but said he did not see the crack. In his witness statement under caution, he claimed that the forecourt was “dark”. Again, the Panel can see from the photographs that this is not an accurate claim.
- q) PC Sullivan also indicated in interview that he had taken his kit bag out of the boot of the car when it had been parked at Sutton Police Station but had not noticed the damage to the bumper even then. Again, this conflicts with his oral evidence which was that he parked the car and got the bag out of the boot and checked it, noticing “considerable damage” to the car.

- r) As we have indicated, PC Sullivan also claimed in oral evidence that the damage had changed over the course of the night, which the Panel finds wholly implausible. This suggestion has not been made before and was therefore not put to the senior investigating officers before or at the Hearing. We have noted that this conflicts with the claim that PC Sullivan did not appreciate the full extent of the damage until September 2025, some six months after the incident.
 - s) PC Sullivan has been inconsistent about whether he knew what the reporting procedure was. As noted above, he told PS Stead that he did not know, and sought to justify his delay in reporting because he did not know to whom the report should be made. He said at interview that he did know the protocol if he had caused a collision. For the first time, at the Hearing however he said that he was “absolutely” aware of the procedure because he had been involved in a previous collision and had followed it then. The Panel finds this further undermines his credibility, casting further doubt on his ability to fulfil his duty to be candid.
- 5.6 Overall, the Panel finds that notwithstanding PC Sullivan’s mantra, expressed on multiple occasions, that he had an “honestly-held belief” that he had not hit the car, this is not credible on balance of probabilities, taking the evidence as a whole. His early reports were that the police car had been hit by a third party vehicle. On his own account therefore he knew from the outset that the damage was such as to have been caused by a collision between two vehicles and not by him mounting even a high kerb. In cross examination, he said that someone else hitting the car was the “only understanding or conclusion” he could reach once he saw the damage.
- 5.7 If PC Sullivan already knew about that damage before he left [REDACTED] Road, he can only have done so if he had looked at the back of the police vehicle before he and PC Rudman set off with the juvenile for Epsom, and accordingly must have been untruthful to everyone to whom he spoke subsequently about not realising he had hit anything and/or that he believed it to have been caused by an unknown third party while the car was unattended.
- 5.8 If PC Sullivan did not know about the damage until he went back to [REDACTED] Road, his failure then to mention it to PC Preston and/or PS Stead shortly afterwards is incomprehensible. He had multiple opportunities to admit the truth. He failed on each occasion to take them.
- 5.8 We find that PC Sullivan was aware that he had collided with the Mercedes in [REDACTED] Road as alleged. We find that he was aware that the collision had caused damage to the rear of his vehicle, though we find it was moderate as assessed by PS Stead at the time, (because PC Sullivan was permitted to continue to drive it back from the BP garage although we accept PS Stead found this to be a marginal call), and not “extensive” as alleged. We find that

he left the scene without reporting the collision or obtaining details of the owner of the Mercedes, as alleged. We find that his entries on the CAD were false and that he knew them to be so, as alleged. We find that he knowingly provided a false account to PS Stead and to PC Preston as alleged.

- 5.9 We do not uphold the allegation that PC Sullivan later returned to the scene before reporting the collision. While PC Sullivan has been untruthful about the cause of the collision, maintaining that it must have been done by an unknown third party while he was out of the car, he had reported it through the CAD and to PC Preston, PS Stead and indeed PS Pankhania before he returned to [REDACTED] Road while on his way to meet PS Stead.

6. Standards

- 6.1 The standards alleged to have been breached here are Honesty and Integrity (Police officers are honest, act with integrity and do not compromise or abuse their position), Duties and Responsibilities (Police officers are diligent in the exercise of their duties and responsibilities. Police officers have a responsibility to give appropriate cooperation during investigations, inquiries and formal proceedings, participating openly and professionally in line with the expectations of a police officer when identified as a witness) and 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). These are objective standards and the standard of proof is the balance of probabilities.

- 6.2 The College of Policing's 2014 Code of Ethics has been superseded and it is not suggested that it is binding on the Panel, but it gives the following detail and observations on the relevant Standards that may be instructive in this case. These standards reflect the expectations that the professional body and the public have of the behaviour of those working in policing:

6.2.1 Honesty and Integrity

- a) The Standard in the 2014 Code said, "I will be honest and act with integrity at all times, and will not compromise or abuse my position".
- b) According to the 2014 Code, police officers who abide by this standard are dependable and are role models. They are sincere and truthful, show courage in doing what they believe to be right and do not knowingly make false, misleading or inaccurate oral or written statements in any professional context.

6.2.2 Duties and Responsibilities

- a) The Standard in the 2014 Code said, "I will be diligent in the exercise of my duties and responsibilities".
- b) According to the 2014 Code, police officers must take full responsibility for, and be prepared to explain and justify, their actions and decisions; in other words, they are accountable. An example of meeting this standard is when an officer ensures that accurate records of their actions

are kept – both as good practice and as required by legislation, policies and procedures.

6.2.3 Discreditable Conduct

- a) The Standard in the 2014 Code said, “I will behave in a manner, whether on or off duty, which does not bring discredit on the police service or undermine public confidence in policing”.
- b) According to the 2014 Code, police officers must keep in mind at all times that the public expect them to maintain the highest standards of behaviour. They must, therefore, always think about how a member of the public may regard their behaviour, whether on or off duty. They should ask themselves whether a particular decision, action or omission might result in members of the public losing trust and confidence in the policing profession.

6.3 We find that PC Sullivan has breached the standards as follows:

Honesty and integrity

- a) By deliberately causing false entries to be made in the CAD, misleading colleagues and supervising officers and giving conflicting accounts and failing to take any of the multiple opportunities offered to correct the initial version.

Duties and responsibilities

- b) By failing to take accountability for his actions and failing to meet his statutory and internal obligations to report a collision truthfully and at the time it occurred.

Discreditable conduct

- c) The Panel has no doubt the actions of PC Sullivan, given his lack of honesty and accountability, have the potential seriously to undermine trust and confidence in policing if a person was fully aware of the circumstances. No reasonable member of the public would consider this is the way for police officers to behave, undermining the ability of law-abiding officers to go about their normal duties.
- d) PC Sullivan’s actions have also led to several officers spending hours investigating this matter unnecessarily because of his lack of candour at the time. Those hours would have been better spent serving the public and not wasted in this manner. The public rightly expects that officers will not behave as PC Sullivan behaved.

7. **Findings on gross misconduct/misconduct/neither**

- 7.1 Gross misconduct is a breach of standards so serious that dismissal would be justified.

7.2 Conduct that is intentional, deliberate, targeted or planned will generally be more culpable than conduct that has unintended consequences. We find that PC Sullivan has:

- deliberately failed to tell the truth by not reporting the collision at the time it occurred;
- deliberately not reported the collision when he has seen the damage further when stopping at Cheam Road;
- maintained his explanation to colleagues at Epsom;
- deliberately put inaccurate information on the CAD;
- continued his deliberate misleading behaviour with colleagues at Sutton. This was further exacerbated when he inexplicably failed to tell PS Stead at the BP garage that he had revisited the scene and observed the damaged Mercedes.

All the while, PC Sullivan knew that in [REDACTED] Road, he had felt a “jolt/bump” and implausibly claims not to have connected the two.

7.3 Further, while we note that there have been no criminal charges brought against, let alone conviction of, PC Sullivan, his conduct in leaving the scene of a collision and failing to report it and/or to provide his details was criminal in nature, enhancing seriousness. As the Guidance on Outcomes notes, it is unacceptable for police officers, who are responsible for enforcing the law, to break the law themselves.

7.4 The Guidance continues by noting that honesty and integrity are fundamental requirements for any police officer and that the Panel should treat seriously any evidence that an officer is dishonest or lacks integrity. Quoting from *Salter*, police officers, “carry out vital public functions in which it is imperative that the public have confidence in them. It is also obvious that the operational dishonesty or impropriety of a single officer tarnishes the reputation of his Force and undermines public confidence in it.” That damage to the reputation is harmful.

7.5 Considering briefly further the harm caused, there has been financial loss to the owner of the Mercedes through the damage. However, this is not part of the misconduct alleged. PC Sullivan’s proven misconduct caused indirect harm - through the wasted investigation and time as noted above - to the public purse, resulting in cost to the MPS and had the potential to cause harm in the impact on public confidence if all the facts were known.

7.6 In the circumstances we therefore assess the conduct at the level of gross misconduct.

8. Findings on outcome

8.1 The Panel reminds itself carefully of the three-fold purpose of the misconduct regime in considering the appropriate outcome in this case.

- 8.2 We have had regard to the character evidence submitted by PC Sullivan and his HR record.
- 8.3 We have made findings on culpability and harm in our assessment above of the level of conduct, and we do not repeat those findings here. In terms of harm, we are careful to differentiate between the costs of the proven misconduct and those incurred as a result of the collision; the latter would have been incurred even if PC Sullivan had complied with his duty and reported the collision as soon as it occurred. We turn then to aggravating and mitigating factors.
- 8.4 So far as aggravating factors are concerned, we have identified the following: PC Sullivan has continued to try to conceal the behaviour but that is a necessary outcome of the dishonesty that we have already found and we are careful not to double-count. Similarly, it was sustained behaviour over a period of time; there was an element of calculation because PC Sullivan changed his story each time new evidence came to light which suggested he had not been truthful and again we have already dealt with that in our earlier assessment. We have found there was a breach of more than one standard, and multiple proven allegations.
- 8.5 We observe, though we do not count it as an aggravating factor, that PC Sullivan left the Hearing despite remaining a serving officer and has thus shown considerable disrespect for the Panel, for the Appropriate Authority and for his representative; he has displayed no remorse. No mitigating factors were advanced on his behalf and we do not identify any from the Guidance on Outcomes or otherwise. Our assessment of seriousness therefore remains high in light of findings of high culpability and high harm.

Personal mitigation

- 8.6 There is some limited mitigation in that PC Sullivan has continued to work without further complaint being raised against him; we note that the written warning was for absence without leave, imposed in September 2025 and is therefore still live but arose from an incident preceding this proven conduct. However, we take into account the fact that the written warning resulted from PC Sullivan, a month before the incident with which we are concerned, being required to attend a training course but he instead went on holiday; this may demonstrate a propensity to deviate from procedure. He has two letters of support from his supervising officers and several examples of meritorious work though we are careful to caveat that with the reminder that purely personal mitigation is not relevant to the seriousness of the misconduct and thus may have a limited effect on the outcome.
- 8.7 Further, PC Sullivan has not expressed any insight that might lead us to have confidence the conduct would not be repeated.

Stage 3 appropriate outcome

8.8 We remind ourselves that the police misconduct regime is not designed to punish police officers; it is about the reputation and standing of the profession as a whole.

8.9 We have started, as we are required to do, with the least severe sanction first:

a) *Final written warning*

We do not consider that public confidence would be maintained by imposing a final written warning. We have very little confidence that PC Sullivan's conduct would not be repeated because of his lack of true remorse, reflection and insight.

We would also have significant concerns as to the deterrent effect on other officers. A final written warning would not in our view deter others or appropriately mark the seriousness of PC Sullivan's conduct given the expectation in *Salter* when a finding of operational dishonesty has been made. We accept that this is not one of the occasions when exceptional circumstances have been shown.

b) *Reduction in rank*

Not applicable to this officer.

c) *Dismissal without notice*

The remaining option is dismissal without notice. We conclude, having carefully considered all the material before us, that it is the only appropriate outcome due to the nature and severity of the breaches.

8.10 PC Sullivan is dismissed without notice and is to be placed on the barred list.

Commander Colin Wingrove

Chair

6th August 2026