

OPUS2

Manchester Arena Inquiry

Day 60

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Wednesday, 3 February 2021

1 (10.00 am)
2 MR GREANEY: Sir, good morning. Today we are going to hear
3 evidence from Mr Richard Thomas, and as you know, sir,
4 the plan is to conclude today at no later than 1 pm.

5 Could Mr Thomas be sworn, please?

6 MR RICHARD THOMAS (sworn)

7 Questions from MR GREANEY

8 MR GREANEY: Could you begin by telling us your full name,
9 please.

10 A. Richard Thomas.

11 Q. Mr Thomas, in December of 2017 did you retire as
12 a police officer?

13 A. I did.

14 Q. At that stage did you hold the rank of chief inspector
15 in South Yorkshire Police?

16 A. That's correct, I did.

17 Q. During your service as a police officer did you work as
18 a firearms officer?

19 A. I did.

20 Q. As a firearms tactical adviser?

21 A. I did.

22 Q. As an operational firearms commander or OFC?

23 A. Yes.

24 Q. And as a tactical firearms commander or TFC?

1

1 A. Yes.

2 Q. For the final 4 years of your service were you seconded
3 to an organisation that we're now familiar with, known
4 now as CTPHQ?

5 A. I was.

6 Q. And did you work there as head of specialist and
7 counter-terrorism armed policing capabilities?

8 A. Yes.

9 Q. Following your retirement in 2017, did you continue
10 in that role as a civilian?

11 A. I did.

12 Q. And indeed, as of this day, do you continue in that
13 role?

14 A. I do indeed, sir.

15 Q. So does it follow that since 2013, you have managed the
16 unit responsible for the development of doctrine, policy
17 and practice to support a coordinated and interoperable
18 UK-wide armed policing response to terrorism and other
19 high-threat incidents or operations?

20 A. That's correct.

21 Q. Do specific responsibilities of your unit include the
22 following: first of all, leading the police service
23 engagement with the Home Office via the Office for
24 Security and Counter-terrorism, for the Marauding
25 Terrorist Firearms Attack Joint Operating Procedures

2

1 Programme?

2 A. Yes, that's correct.

3 Q. Secondly, lead responsibility for police single service
4 Operation Plato national doctrine and contingency
5 planning?

6 A. Yes, that's correct.

7 Q. I have just mentioned the joint operating procedures
8 programme. Could you tell us in a few sentences what
9 that is, please?

10 A. Yes. That is a programme that sits under the Joint
11 Emergency Services Interoperability Programme or JESIP.
12 JESIP is the overarching guidance as to how the three
13 emergency services will work together to deal with any
14 form of significant or major incident. The joint
15 operating principles for a marauding terrorist firearms
16 attack build upon the JESIP principles and direct how
17 the three emergency services should respond together,
18 specifically in respect of a marauding terrorist
19 firearms attack or MTFA.

20 Q. So is it an accurate way of looking at it to think of
21 JESIP at the top, then beneath that the JOPs, and then,
22 as we are going to hear I think from you, beneath that
23 there is guidance issued by, first of all, ACPO TAM and
24 more recently CTPHQ in relation to marauding terrorist
25 firearms attacks?

3

1 A. Yes, that's correct. All three emergency services will
2 have their own, what we describe, as single service
3 doctrine that will flow from the tri-service doctrine
4 that are the joint operating principles.

5 Q. I see. Just before we start to delve into that in more
6 detail, I want to identify with you what you've been
7 asked to help with. Have you been asked to provide an
8 overview of the national guidance designed to assist
9 local police forces in developing their contingency
10 plans for responding to a marauding terrorist firearms
11 attack?

12 A. I have, yes.

13 Q. But I believe, in fact I know, that what you are not
14 here to deal with are the policies within GMP for
15 an MTFA.

16 A. No, sir.

17 Q. And you are not here to comment on the actions of GMP
18 officers on the night of the arena attack, whether
19 generally or by reference to national policies?

20 A. No, sir, that's correct.

21 Q. As you'll appreciate, that's for others, including
22 experts, to comment upon in due course.

23 Indeed, you've been very clear that you do not
24 consider either of those things to be part of your role
25 here today, do you?

4

1 A. No, sir.
 2 Q. And given that, as we know from Assistant
 3 Commissioner Basu's evidence yesterday, you played
 4 a part on the night, it may well not be right for you to
 5 effectively act as an expert witness.
 6 A. Correct.
 7 Q. So we've drawn the red line right at the beginning.
 8 Let's begin then with what I will describe as
 9 a high-level summary of the position. Did the concept
 10 of an MTFA and the term "Operation Plato", which you'll
 11 explain shortly, emerge out of the 2008 Mumbai attacks?
 12 A. They did, yes.
 13 Q. Simply by way of background, and put me right if I've
 14 got this wrong, those attacks, which are sometimes also
 15 referred to as 26/11, were a series of terrorist attacks
 16 that took place in November 2008?
 17 A. That's correct.
 18 Q. When members of an extremist Islamic terrorist
 19 organisation carried out 12 coordinated shooting and
 20 bombing attacks --
 21 A. That's correct.
 22 Q. -- that lasted for 4 days and occurred across Mumbai?
 23 A. Yes.
 24 Q. The attacks began on Wednesday, 26 November and lasted
 25 until Saturday, 29 November 2008?

5

1 A. Yes.
 2 Q. And it has been reported that at least 170 people died.
 3 A. Yes.
 4 Q. And that more than 300 were wounded?
 5 A. That's correct, sir.
 6 Q. So it was from there that what we're going to be looking
 7 at emerged --
 8 A. Yes.
 9 Q. -- the concept of an MTFA?
 10 Did the police service, in conjunction with the
 11 Home Office -- and by Home Office I mean the OSCT and
 12 their emergency service partners -- first begin
 13 providing national guidance to inform planning for the
 14 response to an MTFA in 2012?
 15 A. Yes, that's correct.
 16 Q. So there was something of a lead-in between 2008 and
 17 2012?
 18 A. There was.
 19 Q. Was the term Operation Plato first introduced in 2012?
 20 A. It was.
 21 Q. And in what way was that term, Operation Plato,
 22 introduced?
 23 A. Plato was the term to reflect the response of the
 24 emergency services to a marauding terrorist firearms
 25 attack.

6

1 Q. Was it first introduced in what was known as
 2 a contingency planning guidance document?
 3 A. It was.
 4 Q. Which was published by the Association of Chief Police
 5 Officers' Terrorism and Allied Matters Committee?
 6 A. Yes, it was.
 7 Q. Usually known as ACPO TAM?
 8 A. That's correct.
 9 Q. Which I believe, and you'll tell me if I've got this
 10 wrong, was the predecessor organisation to what we now
 11 know as CTPHQ?
 12 A. Yes, it was.
 13 Q. Was that guidance document that we'll look at in
 14 a moment published in May of 2012?
 15 A. Yes, it was.
 16 Q. And then later refreshed, as it was called, in 2017?
 17 A. Yes, that's correct.
 18 Q. I'll be looking with you at both the 2012 and 2017
 19 documents.
 20 In June of 2012, so a month after ACPO TAM published
 21 their document, did OSCT publish their own document?
 22 A. They did, the first edition of the marauding terrorist
 23 firearms attack joint operating principles or MTFA JOPs.
 24 Q. Were the JOPs you have just described developed by the
 25 OSCT coordinated MTFA joint operational working group?

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1 A. That's correct, they were.
 2 Q. What is that group comprised of?
 3 A. That group is chaired by representatives of the Office
 4 for Security and Counter-terrorism in the Home Office
 5 and includes representatives from police, fire and
 6 ambulance and other interested stakeholder parties.
 7 Q. Were the JOPs intended to support the aims of working
 8 together?
 9 A. Yes.
 10 Q. And as we've heard a number of times now, the response
 11 to an MTFA, or something similar, most certainly calls
 12 for a coordinated response by the emergency services,
 13 would you agree?
 14 A. I would very much agree, sir, yes.
 15 Q. Were the JOPs also intended to save lives and reduce
 16 harm?
 17 A. Yes.
 18 Q. Through, as you put it in your statement, a consistent
 19 and integrated response to an MTFA by all three
 20 emergency services?
 21 A. Yes, sir.
 22 Q. And by that, of course we mean the police, fire and
 23 rescue service and ambulance services.
 24 A. Yes.
 25 Q. Were the JOPs intended to be used to inform existing

8

1 single service national guidance and detailed local
 2 contingency plans?
 3 A. They were indeed.
 4 Q. This is what you have described already. The JOPs sit
 5 above single service policies?
 6 A. Yes.
 7 Q. From 2012 until April of 2019, was Operation Plato the
 8 agreed national identifier for the response to a
 9 no-notice MTFA?
 10 A. It was.
 11 Q. So that I believe what we should understand is that the
 12 term "MTFA" describes the type or nature of the
 13 incident?
 14 A. Correct.
 15 Q. Whereas Operation Plato describes the multi-agency
 16 response to that incident?
 17 A. That's correct, sir.
 18 Q. And throughout the whole of that period, 2012 to 2019,
 19 has that terminology been adopted by key agencies
 20 including the police, ambulance service, fire and rescue
 21 service, military, NHS and local and Central Government
 22 departments?
 23 A. It has.
 24 Q. We were just dealing with the period to April 2019.
 25 In that month did something change?

9

1 A. It did, sir, yes.
 2 Q. What was that, please?
 3 A. The reference "Plato" was widened to all forms of
 4 marauding terrorist attacks rather than purely marauding
 5 terrorist firearms attacks.
 6 Q. What was the driver for that change?
 7 A. It was in recognition of the horrendous attacks that
 8 we'd seen in this country and elsewhere around the world
 9 in terms of what we described as a less sophisticated
 10 attack, so where attackers are using knives, blunt
 11 instruments, vehicles as weapons, a much wider but less
 12 sophisticated attack methodology. So it was decided
 13 that the response to be amended to reflect what we were
 14 seeing here in this country.
 15 Q. And that occurred in April 2019?
 16 A. It did, yes.
 17 Q. I said we'd come to the ACPO TAM Operation Plato
 18 contingency planning guidance of May 2012. Is it the
 19 position that that was primarily intended to assist
 20 police forces in creating a contingency plan or for
 21 refining an existing plan for responding to an MTFA?
 22 A. It was.
 23 Q. As we're going to see, but we'll just deal with it in
 24 summary for the moment, did that document include a list
 25 of suggested key actions and considerations during the

10

1 initial response to an MTFA?
 2 A. It did, yes.
 3 Q. Which included declaring Operation Plato?
 4 A. Yes.
 5 Q. Deploying firearms resources?
 6 A. Yes.
 7 Q. Informing unarmed police officers of the nature of the
 8 incident?
 9 A. Yes.
 10 Q. Informing fire and rescue service and
 11 ambulance services?
 12 A. Yes.
 13 Q. And setting the initial strategy to inform a coordinated
 14 response?
 15 A. Yes.
 16 Q. And as we're going to see when we look at both the 2012
 17 and 2017 iterations, without elevating this above the
 18 other features, we are going to see that one of the
 19 features of Operation Plato is that once it is declared,
 20 communication to partner emergency services is
 21 important?
 22 A. It is.
 23 Q. So let's look then at the 2012 guidance. That will
 24 appear on the screen in front of you. The reference is
 25 {INQ013767/1}.

11

1 I'm just going to pick out with your assistance some
 2 particular parts of this.
 3 Under the heading "Background and intention of this
 4 document", paragraph 1.1, it is primarily intended to:
 5 "Assist forces in creating a contingency plan (or
 6 refining an existing plan) for responding to
 7 a coordinated marauding terrorist firearms attack; that
 8 term is linked to the national risk assessment (NRA)
 9 which creates the planning assumptions for responding to
 10 a Mumbai-style attack."
 11 What is the national risk assessment, please?
 12 A. The national risk assessment is a document held by
 13 Central Government that articulates all of the risks
 14 facing the country and provides information as to how
 15 those risks should be mitigated.
 16 Q. Paragraph 1.2:
 17 "To achieve commonality of terminology between
 18 forces and amongst the emergency services the
 19 operational name for responding to an incident of this
 20 nature has been agreed nationally as Operation Plato.
 21 In describing this type of incident attack forces should
 22 therefore use that common term, which must not be
 23 disclosed publicly."
 24 Which of course I have just done, but I can say that
 25 I have not broken any rule because that term is no

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1 longer regarded as being operationally sensitive .
 2 A. That's correct.
 3 Q. Paragraph 1.3, and I'm not going to read nearly every
 4 world of this document, but six lines down:
 5 "However, the proposed actions and suggestions
 6 contained within this guidance have been carefully
 7 thought out in consideration of recent counter—terrorism
 8 exercises and with the input of subject matter experts."
 9 Is that correct?
 10 A. That's correct.
 11 Q. So far as the preparation of this document is concerned
 12 and the preparation of the 2017 document with which
 13 I think you were more intimately concerned, is that
 14 correct?
 15 A. That's correct; I wasn't involved in the creation of the
 16 2012 guidance.
 17 Q. You arrived the year after , as you have told us. What
 18 you will be able to confirm is that, so far as 2017 is
 19 concerned, from your direct knowledge, and so far as
 20 2012 is concerned from your understanding, the results
 21 of exercising around the country were fed into the
 22 policy?
 23 A. They were indeed, yes.
 24 Q. As you know from a discussion we had before you started,
 25 I'm going to ask you about whether Exercise

1 Winchester Accord was fed into 2017, although
 2 I appreciate you may need to go away and do some
 3 specific research into that in due course.
 4 A. Yes.
 5 Q. 1.3 continues:
 6 "To encourage closer working amongst the emergency
 7 services , this guidance will be shared at a national
 8 level with the ambulance service and fire and rescue
 9 service."
 10 A. That's correct.
 11 Q. So we're seeing again this idea of joint working.
 12 At 1.4, we see that concept again, three lines down:
 13 "It has been recognised that a joint response by the
 14 three emergency services is necessary to ensure that
 15 casualties are reached at the earliest possible
 16 opportunity in order to save lives ."
 17 A. That's correct.
 18 Q. So we see a recognition there that where there has been
 19 an MTFAs, or perhaps a similar attack, there needs to be
 20 a joint response so that those who have been injured or
 21 harmed by such an event are assisted as soon as can be
 22 achieved?
 23 A. That's correct, sir .
 24 Q. Next page {INQ013767/3}, please, Mr Lopez, under the
 25 heading:

1 "2. Identifying and declaring a Plato incident."
 2 2.1:
 3 "Like any critical or major incident, it is
 4 important that a marauding terrorist firearms attack is
 5 identified at the earliest opportunity. This will
 6 enable both the police and other emergency responders to
 7 react collaboratively and with due consideration to the
 8 unique nature of the threat."
 9 A. That's correct.
 10 Q. So since Operation Plato came into existence, the idea
 11 of the declaration of Plato accompanied by early
 12 communication of that to partner agencies has existed?
 13 A. It has indeed.
 14 Q. 2.2:
 15 "It is also important to note that a Plato incident
 16 is distinct from any other form of firearms incident .
 17 Identification criteria that may indicate an attack of
 18 this nature is underway might include the following:
 19 assailants attacking multiple sites ; use of high calibre
 20 automatic firearms; indiscriminate targeting of people
 21 intended to cause mass casualties; explosive devices
 22 used [is then indicated]."
 23 Pausing for one moment. In accordance with this
 24 policy , and indeed the 2017 policy, would the fact that
 25 an explosive device has been used of itself be

1 sufficient for the declaration of Operation Plato?
 2 A. No. Plato signified the response to a marauding
 3 terrorist firearms attack. The guidance here
 4 acknowledges that that could be — that type of attack
 5 could be multi—faceted and so it may include the use of
 6 explosive devices as part of the attack methodology, but
 7 it wouldn't be expected to be used as the response
 8 purely to an explosive device being used.
 9 Q. So put it this way: if there has been a bomb detonation
 10 and from the outset it is known that that is all that
 11 has or will occur, it would not be appropriate to
 12 declare Operation Plato?
 13 A. It wouldn't. However, the guidance does fully recognise
 14 that during the early stages of an attack, information
 15 intelligence can be very confused and it can be very
 16 difficult for the commanders to identify exactly at that
 17 stage what they are dealing with.
 18 Q. And this was exactly the point that I was just moving
 19 to, which, thank you, you've dealt with. I described
 20 a scenario in which one knows from the outset a position
 21 with certainty. But you're making the certainly correct
 22 point that where an explosion has occurred, how often is
 23 it going to be the position that one will know with
 24 certainty that that is an end of it.
 25 A. That's correct.

1 Q. And those who are the commanders will often be justified
 2 in suspecting that something else may be about to occur?
 3 A. Yes, sir .
 4 SIR JOHN SAUNDERS: In the guidance is the mere fact of an
 5 explosion sufficient to justify the suspicion that there
 6 may be other gunmen or other explosions?
 7 A. It would require the commanders in position at the time
 8 to reflect on all the available information and
 9 intelligence , so the entire picture that they could see,
 10 sir .
 11 SIR JOHN SAUNDERS: Thank you.
 12 MR GREANEY: As I said, we're not going to stray into what
 13 happened in Manchester, but the commander would also
 14 have regard to what recent experience had demonstrated
 15 about the nature of terrorist attacks?
 16 A. Indeed.
 17 Q. And would be expected to know about Mumbai and, by 2017,
 18 to know what had occurred in Paris and so on?
 19 A. Very much so.
 20 Q. To go back to the list:
 21 " [REDACTED] Offenders
 22 shouting religious /ideological remarks. Panic in
 23 a crowded place or iconic site . An increased volume of
 24 calls from the general public [describing any of those
 25 matters that we've just described]" .

1 Next page {INQ013767/4}, please, Mr Lopez,
 2 paragraph 2.4:
 3 "Any emergency service responder may notify their
 4 control room if they suspect that a Plato incident is
 5 occurring. However, Operation Plato can only be
 6 declared by a police FCR inspector."
 7 FCR being force control room?
 8 A. That's correct.
 9 Q. Then a little lower down:
 10 "It is important that the FCR inspector ensures that
 11 the other emergency response agencies are informed
 12 immediately once a declaration has been made, as this
 13 will also trigger a predefined response by those
 14 organisations."
 15 A. That's correct.
 16 Q. Something that we've emphasised already.
 17 2.5:
 18 "Where Operation Plato has been declared and it
 19 subsequently becomes apparent that the incident is not
 20 a marauding terrorist firearms attack, then the officer
 21 who is undertaking the role of tactical firearms
 22 commander (firearms Silver) should redefine the incident
 23 accordingly. In this circumstance the FCR inspector
 24 should notify all police responders and emergency
 25 service control rooms immediately."

1 So can we just understand what that means? Is this
 2 the idea that one should keep under -- if
 3 Operation Plato has been declared, one should keep that
 4 declaration under review?
 5 A. Yes.
 6 Q. And that if it subsequently becomes apparent that the
 7 incident is not a marauding firearms attack, then the
 8 incident should be redefined?
 9 A. That's correct so that all of the commanders and
 10 responders involved in the incident have full
 11 situational awareness and everybody, to quote the term,
 12 is on the same page.
 13 Q. So in the scenario I gave you earlier , a bomb has been
 14 detonated, the inspector making the decision about
 15 whether to declare Operation Plato suspects that more
 16 may be about to occur, declares Operation Plato. All of
 17 that may well be reasonable, but that decision needs to
 18 be kept under review?
 19 A. Very much so.
 20 Q. And if it subsequently becomes apparent that there is
 21 not more and that what has happened is just -- just
 22 doesn't seem like the right word but you understand what
 23 I mean -- is just a bomb, at that stage the situation
 24 needs to be redefined?
 25 A. Yes. Again, as just stated, to ensure that everybody

1 involved in the response, be they the individuals on the
 2 scene or commanders, that everybody has that full
 3 situational awareness of what's taking place and can
 4 respond accordingly.
 5 SIR JOHN SAUNDERS: And the reason for that is that the
 6 declaration of Plato may interfere with the rescuing of
 7 survivors and injured?
 8 A. The declaration of Plato will impact in how activity
 9 at the scene is undertaken, sir, yes.
 10 SIR JOHN SAUNDERS: And that's the reason why it needs to be
 11 kept under constant review?
 12 A. Yes.
 13 MR GREANEY: So the chairman's question focused on something
 14 important, does it not, that Operation Plato will
 15 involve the identification of particular zones?
 16 A. It can do, yes.
 17 Q. Hot, warm and cold.
 18 A. Yes.
 19 Q. The zoning has consequences for who is able to go into
 20 those particular areas?
 21 A. It informs command decisions about who should be
 22 deployed into those areas, yes.
 23 Q. You're rightly correcting me. And that may have an
 24 impact upon how quickly those who have been injured can
 25 be seen by those who are able to assist them?

1 A. It may.
 2 Q. 2.7:
 3 "The primary aim of the armed police response to
 4 a Plato incident will be to identify, locate and
 5 confront the gunmen in order to neutralise threat."
 6 SIR JOHN SAUNDERS: If we could just move the screen down.
 7 MR GREANEY: Yes. Mr Lopez, if you could follow the
 8 paragraphs that I'm taking the witness to, thank you
 9 very much:
 10 "The primary aim of the armed police response to
 11 a Plato incident will be to identify, locate and
 12 confront the gunmen in order to neutralise the threat."
 13 Over the page {INQ013767/5}, 2.8:
 14 "The initial police strategy for responding to
 15 a Plato incident should therefore include: identify,
 16 locate and confront the attackers in order to neutralise
 17 the threat; minimise risk to members of the public;
 18 maximise the safety of police, fire and ambulance
 19 responders; where possible, support fire and ambulance
 20 personnel in casualty evacuation; where possible, arrest
 21 offenders to enable them to be brought to justice;
 22 secure and preserve evidence to support a criminal
 23 prosecution or inquiry; assist in returning the location
 24 to normality."
 25 SIR JOHN SAUNDERS: Can I just -- we'll hear more about this

21

1 later, I know, but the fourth bullet point, "Where
 2 possible support fire and ambulance personnel in
 3 casualty evacuation", does that indicate that fire and
 4 ambulance would be seen as the prime people concerned in
 5 casualty evacuation and the police help if they are able
 6 to?
 7 A. Yes, sir, because it recognises that the primary aim of
 8 the strategy is to identify, locate and confront the
 9 attackers in order to stop them presenting a risk to any
 10 further potential victims and so the police focus is on
 11 that number one aim. Any police resources not engaged
 12 in that number one aim would then be expected to support
 13 colleagues from fire and ambulance in terms of casualty
 14 evacuation or rendering treatment, first aid, et cetera.
 15 SIR JOHN SAUNDERS: Thank you.
 16 MR GREANEY: I just want to take you to one final part of
 17 this guidance document and then we'll move on to what
 18 happened in 2017.
 19 The guidance document also contained a list of key
 20 actions and considerations during the initial response
 21 phase. I'm going to draw your attention to key
 22 action 4. This is {INQ013767/7}, please, in the bottom
 23 half of that page.
 24 Key action 4:
 25 "Inform neighbouring police force control rooms,

22

1 fire and rescue service, and ambulance service control
 2 rooms."
 3 So that is the action that ought to be taken. The
 4 rationale is given:
 5 "The declaration of a Plato incident should be
 6 relayed to emergency service control rooms without delay
 7 to enable them to initiate relevant contingency plans,
 8 thereby minimising the risk to responders' lives.
 9 Communication with fire and ambulance control rooms
 10 should remain open throughout the event [and the way
 11 that that should be achieved is described] and then an
 12 emergency service multi-agency marshalling area should
 13 be agreed by the FCR inspector. This will enable
 14 unarmed responders to muster in a safe environment and
 15 to await scene updates from armed response vehicle units
 16 confronting the threat."
 17 Thank you, that's all that I want to ask you about
 18 the 2012 document.
 19 In March of 2017 did CTPHQ, as it had then become,
 20 publish a refreshed version of the document that we've
 21 just looked at?
 22 A. It did, yes.
 23 Q. Did the refreshed version take account of the original
 24 2012 guidance?
 25 A. It did.

23

1 Q. The latest version of the MTFA JOPs?
 2 A. Yes, edition 3.
 3 Q. An extensive national consultation and benchmarking
 4 exercise?
 5 A. It did.
 6 Q. Which had captured good practice from individual force
 7 level plans across the UK?
 8 A. Yes.
 9 Q. Organisational learning emerging from operations and
 10 exercising?
 11 A. Yes.
 12 Q. And also the findings from an inspection carried out by
 13 HMICFRS, Her Majesty's Inspectorate of Constabulary of
 14 Fire and Rescue Services?
 15 A. That's correct.
 16 Q. Was the 2017 document based on the 2012 version but with
 17 a greater level of detail?
 18 A. It was, yes.
 19 Q. So that as we are going to see, it increased from 14 to
 20 36 pages?
 21 A. Yes, indeed.
 22 Q. And was it intended to support a more consistent and
 23 interoperable approach across police forces?
 24 A. Yes.
 25 Q. Was it intended to work together with the JOPs?

24

1 A. It was. As we discussed earlier, the Plato guidance,
 2 being the police single service guidance, is intended to
 3 flow from the tri-service guidance, which is the MTFA
 4 JOPs, as they were at that time.
 5 Q. As we've just seen, one of the documents that was taken
 6 into account was a report of HMICFRS; is that correct?
 7 A. That's correct.
 8 Q. Was that inspection an inspection which resulted in the
 9 publication of a report in August 2017?
 10 A. Yes, that's correct.
 11 Q. Entitled:
 12 "A joint inspection of the command and control
 13 arrangements and supporting infrastructure used by the
 14 police forces of England, Wales and Scotland in response
 15 to a terrorist attack?"
 16 A. That's correct.
 17 Q. So just so we can understand what happened, the new
 18 CTPHQ guidance on MTFAs was published in March of 2017?
 19 A. It was.
 20 Q. The HMICFRS report of its inspection was published later
 21 than that in August of 2017?
 22 A. Yes, that's correct.
 23 Q. But am I right that what occurred was that HMICFRS had
 24 provided CTPHQ with the outcome of its inspection well
 25 before March of 2017?

25

1 A. They had. We'd been working with them as part of our
 2 development of the revised guidance.
 3 Q. I have probably expressed all of this in a very
 4 confusing way, but the reality is that although HMICFRS
 5 published its report after the new guidance, the new
 6 guidance fully took into account what the report of the
 7 inspection had revealed?
 8 A. Yes, there was some understandable lag between what
 9 HMICFRS described as field work, where they're actually
 10 gathering their evidence and speaking to forces, there
 11 is some lag between that field work and the final report
 12 being published. It was during that period that we were
 13 engaged with them so that we could harvest the learning
 14 from their inspection.
 15 Q. I'm going to look with your assistance at the HMICFRS
 16 report in a moment. But in summary, did the
 17 inspectorate find that the 2012 guidance that we've
 18 looked at was generally fit for purpose?
 19 A. They did, yes.
 20 Q. But identified some areas for development?
 21 A. Yes.
 22 Q. By working with the inspectorate, was CTPHQ able to
 23 address the inspectorate's findings in respect of the
 24 2012 guidance in the refreshed 2017 guidance?
 25 A. Yes, we were.

26

1 Q. We'll come to the refreshed guidance in due course, but
 2 first of all we'll look at the inspectorate's report.
 3 So Mr Lopez, again, I'll ask you just to follow the
 4 particular pages and perhaps that I'm going to. Start
 5 at page 1 of the following reference, {INQ025071/1}.
 6 That is the front page of the report. As we can see,
 7 it's dated August 2017.
 8 Would you go next, please, to {INQ025071/4} and the
 9 top half of that page.
 10 As you'll fully appreciate, I'm not going to read
 11 out anything apart from just very small parts of this
 12 document. If you think I'm missing anything important,
 13 no doubt you'll draw that to my attention.
 14 A. Yes.
 15 Q. Summary:
 16 "This inspection, the second in a series of joint
 17 counter-terrorism (CT) policing, inspections, sought to
 18 answer the question: how well prepared is the police
 19 service to respond effectively to a terrorist attack by
 20 considering the command and control arrangements in
 21 place and the connectivity between forces and with the
 22 CT network?"
 23 Then a little further down:
 24 "We were particularly interested in local forces'
 25 plans and preparations for their response to a marauding

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1 terrorist firearms attack (MTFA or MTA), also referred
 2 to as a Plato incident."
 3 A. Yes.
 4 Q. Next, please, {INQ025071/14}, the bottom half of that
 5 page:
 6 "Our review against the 'Operation Plato: Initial
 7 Response Contingency Plan Guidance to Police Forces
 8 (2011)'. "
 9 Should that be a reference to 2012?
 10 A. I believe it should, yes.
 11 Q. A little further down it reads:
 12 "Plato plans were readily accessible to staff."
 13 So this is inspectorate reporting upon its
 14 findings — and I perhaps should have said I believe the
 15 inspectorate had reviewed the position in relation to
 16 15 police forces around the country?
 17 A. Yes, that's correct.
 18 Q. Which included, as it happens, Greater Manchester
 19 Police:
 20 "Plato plans were readily accessible to staff in the
 21 force control rooms on hard copy or on computer systems,
 22 although knowledge of the plans and their content was by
 23 no means comprehensive among those we interviewed."
 24 A. Correct.
 25 Q. "We found that many interviewees placed an over-reliance

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1 on the force incident manager, also referred to as the
 2 initial tactical firearms commander, to provide them
 3 with direction.”
 4 Just pausing for a moment, we’re going to see,
 5 aren’t we, that this is just one of the issues that was
 6 identified by the inspectorate in relation to the force
 7 incident manager?
 8 A. Yes.
 9 Q. Or FDO, as we know that person in the context of
 10 Manchester, and we’re going to see a developing sense
 11 throughout this report that there was always a risk in
 12 an Operation Plato incident of the FDO becoming
 13 overburdened.
 14 A. Yes, that was a well recognised factor.
 15 SIR JOHN SAUNDERS: Perhaps we should make clear, from
 16 looking at the first page, that while the report was no
 17 doubt prepared before March 2017, they do appear to take
 18 into consideration the response to the Manchester
 19 attack.
 20 MR GREANEY: That is entirely correct, sir.
 21 SIR JOHN SAUNDERS: So it would have been adjusted to take
 22 that into account?
 23 A. Yes.
 24 MR GREANEY: I think, to be fair to the point I was inviting
 25 the witness to agree, the work of the inspectorate had

1 identified the problem with overburdening the FDO before
 2 Manchester.
 3 A. Yes. It was a well understood fact that the FDO was
 4 a potential single point of failure .
 5 SIR JOHN SAUNDERS: Thank you.
 6 MR GREANEY: That’s a very concise way of putting it,
 7 thank you.
 8 It continues:
 9 “Providing this direction at the same time as
 10 managing all aspects of the any response would quickly
 11 overburden that individual.”
 12 A. Yes.
 13 Q. It carries on:
 14 “Forces had different interpretations of the purpose
 15 of a Plato plan. This is illustrated in the variation
 16 in scale and content that we found. The shortest plan
 17 we examined was 16 pages, the longest plan was 225 pages
 18 in two volumes, not including additional appendices.
 19 We were concerned to find that plans had different
 20 strategic aims. Some focused on managing extreme
 21 threats or critical incidents in general rather than
 22 a clearly defined response to a Plato incident. There
 23 was a lack of specific guidance relating to the unique
 24 demands of a Plato incident for force incident managers,
 25 unarmed patrol officers and control room staff and no

1 two plans had similar content, even those produced by
 2 neighbouring local forces with shared firearms
 3 commanders, which would have an adverse effect on the
 4 ability of forces to work together.”
 5 We’ll then move forward to {INQ025071/28}, please.
 6 We’re going to be looking at the heading “Training for
 7 a Plato incident”:
 8 “We were pleased to find that most interviewees were
 9 confident in the capability and training of firearms
 10 officer to respond effectively and the ability of
 11 firearms commanders to lead the police response. The
 12 level of confidence was generally higher among firearms
 13 commanders who had received training and briefing on
 14 Plato incidents as part of their continuous professional
 15 development and where staff (such as those in the force
 16 control room) had received additional training or
 17 briefings on Plato incidents and had tested their role
 18 and the force response in training exercises . But
 19 confidence was much lower among unarmed patrol
 20 officers — many did not understand their role during
 21 a Plato incident and had received little training or
 22 briefing — and among staff who had not practised their
 23 role in the force plan.
 24 “Interviewees also told us that the effectiveness of
 25 their force response could be diminished by the

1 inability of individuals to manage the unprecedented
 2 scale and impact of the incident, particularly those who
 3 had not been trained, briefed or had a chance to take
 4 part in training exercises in their role, eg call
 5 handlers, patrol officers and force incident managers.”
 6 A. That’s correct.
 7 Q. So the inspectorate was identifying really the
 8 importance of training, briefing and exercising; would
 9 that be fair?
 10 A. Yes, it would.
 11 Q. Then over the page, the bottom of the next page,
 12 {INQ025071/29}, under the heading “Force incident
 13 managers”. We’re just returning to a point that we were
 14 discussing a little earlier :
 15 “Force incident managers in local forces play
 16 a particularly important role in the initial response to
 17 a Plato incident ... ”
 18 And we saw that in the 2012 guidance:
 19 “... as they must declare the Plato incident and
 20 command the initial response. Only the police can
 21 declare a Plato incident, which is designed to trigger
 22 a specific response from the other emergency services.
 23 The declaration of a Plato incident will prompt
 24 a three—way conference call between commanders in the
 25 emergency service control rooms.”

1 Is that talking about a conversation between the
 2 control rooms of the three different emergency services?
 3 A. It is, yes.
 4 Q. That's what ought to occur?
 5 A. Yes.
 6 Q. "This call is intended to help develop a common
 7 understanding of the incident and agree initial actions
 8 for a joint response that saves lives. We tested the
 9 arrangements for making such a conference call in all
 10 the local forces we visited [including GMP] and are
 11 satisfied that in all cases this call would be made."
 12 Then a little further down that page:
 13 "All the force incident managers we spoke to
 14 described receiving Plato updates through their firearms
 15 command continuous development programme. However, the
 16 majority said they felt ill-equipped for the critical
 17 role they would perform in a Plato incident and needed
 18 more training, guidance and exposure to Plato
 19 exercises."
 20 A. That's correct.
 21 Q. And for reasons that many watching this feed will
 22 understand, I'm going to read again that sentence:
 23 "The majority [so this is the majority of force
 24 incident managers] said they felt ill-equipped for the
 25 critical role they would perform in a Plato incident and

1 needed more training, guidance and exposure to Plato
 2 exercises. This point was illustrated by one force
 3 incident manager who said, 'I get 2 days on how to
 4 command a vehicle pursuit and approximately 1 to 2 hours
 5 in MTFA'. We think there is a balance [say the
 6 inspectorate] to be struck between preparing for the
 7 most likely incident and for the most demanding
 8 incident."
 9 We're not far from the end of this exercise, which
 10 I appreciate may be a little tedious but is important.
 11 A. Yes, sir.
 12 Q. {INQ025071/31} next, please, under the heading "Unarmed
 13 patrol officers":
 14 "Our interviews with unarmed patrol officers
 15 revealed a more disappointing picture. Beyond the
 16 computer-based Stay Safe training..."
 17 What is the Stay Safe training?
 18 A. Stay Safe training is provided to all unarmed police
 19 officers and to individuals that work in police control
 20 rooms on the actions that unarmed officers should be
 21 taking when they're called upon to respond to a firearms
 22 incident in the early stages. It's how those officers
 23 can achieve what they need to achieve in the early
 24 stages before armed support arrives and how they can do
 25 so, endeavouring to keep themselves as safe as possible.

1 Q. So in relation to unarmed patrol officers, beyond the
 2 Stay Safe training there was, it's said, very little
 3 Plato training provided for unarmed patrol officers:
 4 "This meant they were unclear about their role in
 5 a Plato incident. One tactical firearms commander told
 6 us, 'The unarmed first response is the untested area for
 7 the force, that's where our vulnerability lies. Because
 8 of the possible ARV response times it's likely that the
 9 first officers to the scene will be unarmed and they
 10 have had the least amount of MTFA training."
 11 {INQ025071/32}, next, please, the bottom of that
 12 page under the heading "Force control rooms":
 13 "We asked force control room staff to describe their
 14 experience of exercises that had tested the response to
 15 a Plato incident over the previous 12 months. The
 16 response was disappointing. The majority of force
 17 control room staff told us they were unaware of any
 18 training exercises held in their force. Even where
 19 exercises had been held, they were unaware if the force
 20 control room had been included. We found only one force
 21 had a structured programme in place, which specifically
 22 tested control room staff through simulating calls from
 23 the public reporting a Plato incident. The call
 24 handlers who experienced this considered it valuable
 25 preparation."

1 Which echoes some questions that were posed on
 2 behalf of NWFC earlier this week.
 3 Then {INQ025071/33}, the penultimate part that we'll
 4 look at under the heading "Learning from experience":
 5 "We were impressed with the ODU's oversight."
 6 ODU being?
 7 A. That's Counter-terrorism Policing's operational
 8 development unit, people that are responsible for
 9 organisational learning across the CT Policing network.
 10 Q. "we were impressed with the ODU's oversight of exercise
 11 recommendations and the work to resolve the issues
 12 raised. However, in all forces we visited we found
 13 a lack of knowledge about lessons learnt material.
 14 Interviewees claimed that they rarely received documents
 15 or updates that led to changes in working practices.
 16 Where documents were made available on the force
 17 intranet, staff told us they did not have time to find
 18 and read them."
 19 Pausing for a moment, I do know that you were able
 20 to watch yesterday Assistant Commissioner Basu's
 21 evidence.
 22 A. I was.
 23 Q. I don't know if you saw the evidence of Mr Argyle on
 24 Monday.
 25 A. Some of it, sir.

1 Q. And you may therefore have heard him agree that where
 2 exercising takes place, and lessons are learned, it is
 3 obviously important that that doesn't occur just for the
 4 sake of it but that those lessons result in real change.
 5 A. That's correct, sir, and that's why Counter—terrorism
 6 Policing as a network has the ODU with the
 7 responsibility of managing that process.
 8 Q. Then finally, the conclusion on {INQ025071/35}.
 9 Obviously, as you will appreciate, I've been focusing on
 10 problems that were identified by the inspectorate. I'm
 11 not suggesting that they didn't identify things that
 12 were positive as well, which is why I'll take you here:
 13 "We found many positive aspects, including the
 14 response of specifically trained firearms officers and
 15 commanders. However, there were shortcomings in the
 16 initial command and control arrangements in police
 17 forces in England, Wales and Scotland. In particular,
 18 the support and advice available to unarmed officers was
 19 inconsistent, incomplete and could lead to a failure
 20 in the police response."
 21 A. That's correct.
 22 Q. Those are the parts of that document that I wanted to
 23 take you to before we look at the 2017 guidance that
 24 built upon those findings and indeed upon other things.
 25 Before we do so, I just want to acknowledge, sir, that

1 although you did refer to that report in your witness
 2 statement, we're grateful to Mr Weatherby and his team
 3 for identifying particular passages of importance in the
 4 report.
 5 SIR JOHN SAUNDERS: Thank you. Can I just deal with two
 6 matters? This may not be the appropriate time. Just
 7 returning to the question of the lessons learnt and
 8 there being some sort of recording of it and then some
 9 sort of checkup to make sure that things have actually
 10 been done. You say that that is the role of the ODU?
 11 A. In terms of lessons that relate to the National
 12 Counter—terrorism Policing network, yes, sir.
 13 SIR JOHN SAUNDERS: How do they do that?
 14 A. They have a system, a computerised system, whereby they
 15 monitor all the identified recommendations or lessons.
 16 They're all fed into that system and then there is
 17 a process by which, on a regular basis, senior
 18 individual within Counter—terrorism Policing review the
 19 progress that's been made against those recommendations
 20 and ultimately, once the recommendations have been
 21 delivered, it will be closed off formally through the
 22 meeting structure that supports that process.
 23 SIR JOHN SAUNDERS: Okay. So the lessons which were learned
 24 out of Winchester Accord would have been recorded by the
 25 ODU?

1 A. So the way that exercising and organisational learning
 2 works within Counter—terrorism Policing network is that
 3 it operates on a national level, which the ODU manage,
 4 but then it will also operate on a regional level, which
 5 the regional counter—terrorism units will manage. So
 6 there will have been — well, there were recommendations
 7 that came out of Exercise Winchester Accord that were
 8 managed within the region and there were others that
 9 were escalated and so were managed through the national
 10 ODU. That is the normal approach so that the workload
 11 and the relevance can be managed appropriately.
 12 SIR JOHN SAUNDERS: So the overloading of the FDO, which was
 13 found on Winchester Accord, that was recorded by which
 14 of those two organisations? The local one or the
 15 national one? If you don't know, you must tell me.
 16 A. Indeed, sir. At the moment I wouldn't be able to
 17 provide with you that information. What I can say
 18 is that the point that I made earlier, it was always
 19 well understood that the FDO role is a role that would
 20 come under significant demand and pressure during the
 21 early stages of the response to a marauding terrorist
 22 firearms attack, and so through the guidance there was
 23 mitigation offered in respect of that. So it wasn't
 24 something that was new to us through Exercise
 25 Winchester Accord, it was something that was recognised

1 for some considerable time and so there was mitigation
 2 offered through the national guidance around that very
 3 point.
 4 SIR JOHN SAUNDERS: The mitigation was? Have more people
 5 doing it?
 6 A. I'm not sure whether Mr Greaney will be taking me to
 7 this as part of my statement later because I do at
 8 various stages of my statement refer to —
 9 SIR JOHN SAUNDERS: Right, we'll deal with that at the
 10 appropriate stage if you're the appropriate witness to
 11 deal with it.
 12 MR GREANEY: I am going to be taking you to every part of
 13 your statement, so I'm sure we will cover it in the end.
 14 SIR JOHN SAUNDERS: Right. You're still involved in this
 15 guidance, as I understand it?
 16 A. I am, yes.
 17 SIR JOHN SAUNDERS: One of the things that the
 18 Kerslake Report considered was the fact that the
 19 mandatory requirement to notify every other organisation
 20 of Operation Plato wasn't actually followed, but it
 21 concluded, and I hope I'm getting this right as
 22 a summary, that in the event it was probably a good
 23 thing that the FDO hadn't followed that guidance,
 24 suggesting that there are occasions when the FDO should
 25 be using their own — have the flexibility to actually

1 do what seems to them to be right in the situation.
 2 It 's not written that way at the moment,
 3 Operation Plato. Has consideration been given to
 4 changing it to allow for that exercise of a discretion?
 5 A. With respect, sir , I would suggest that the joint
 6 operating principles and the Plato guidance are already
 7 written that way. They are broad principles to guide
 8 and steer commanders and responders in what will
 9 undoubtedly be a very unclear and dynamically changing
 10 situation . What's at the very heart of the guidance is
 11 what's referred to either in multi-agency circles as the
 12 joint decision model or within police guidance as the
 13 national decision model. Those models are at the very
 14 heart of the response and those models very much talk
 15 about commanders using their experience and their
 16 initiative and the guidance that's available to them and
 17 should apply that in a pragmatic way based on the
 18 circumstances that are prevailing at the time.
 19 SIR JOHN SAUNDERS: Okay. Forgive me just for pushing you
 20 a bit on that. Actually, Operation Plato is
 21 described -- that phrase of it is "must do that":
 22 "Must notify all of the other agencies of
 23 a declaration of Operation Plato immediately."
 24 A. I'd need to refer to the document itself to remind
 25 myself whether it says must or whether it says should.

1 But I would need to refer to the --
 2 SIR JOHN SAUNDERS: I have looked at it, it said "must",
 3 I think. I could be wrong.
 4 The second point is that I do understand about the
 5 joint decision-making model, but actually this is
 6 a decision that the FDO makes very much on his own at an
 7 early stage of an event like this.
 8 A. It does, and the joint decision model is something that
 9 people will use, both individually and collectively , and
 10 I know that this can be a little confusing because it is
 11 referred to as both the joint decision model and the
 12 national decision model. But the model is actually the
 13 same, it's just referred to as the joint decision model
 14 for the tri-service partners, but then when the police
 15 are working in isolation , they would refer to it as the
 16 national decision model. But actually, the model is the
 17 same and that is very much about either individually or
 18 collectively using the model to steer your
 19 decision-making process.
 20 SIR JOHN SAUNDERS: Okay.
 21 MR GREANEY: Just to address the point you made a moment
 22 ago, could we have on the screen, please, {INQ013767/4}?
 23 It 's a document we were just looking at, Mr Lopez.
 24 This is the 2012 guidance. We'll see what 2017 had
 25 to say, I suspect after a break.

1 SIR JOHN SAUNDERS: I'm now going to be proved either right
 2 or wrong in my recollection.
 3 MR GREANEY: We'll see, sir.
 4 Paragraph 2.4:
 5 "It is important that the FCR inspector ensures that
 6 the other emergency response agencies are informed
 7 immediately once a declaration has been made, as this
 8 will also trigger a predefined response by those
 9 organisations."
 10 Which might be thought mandatory in tone. There may
 11 be other parts, sir . I found one of them. This is the
 12 key actions, the bottom half of that page {INQ013767/7}:
 13 "Inform neighbouring police force control rooms,
 14 fire and rescue service and ambulance service control
 15 rooms. The declaration of a Plato incident should be
 16 relayed to emergency service control rooms without delay
 17 to allow them to initiate relevant contingency plans,
 18 thereby minimising the risk to responders' lives."
 19 And whilst the word "should" is used, again it might
 20 be thought that does have a mandatory flavour to it.
 21 Just to pick up on one other thing the chairman
 22 asked you about, Exercise Winchester Accord. Your
 23 witness statements don't currently deal with that issue,
 24 which is absolutely no criticism of you because you
 25 weren't asked to do so, but you were good enough to

1 inform me this morning when we spoke, as I do to all of
 2 the witnesses I call , that you were aware of Exercise
 3 Winchester Accord --
 4 A. Yes.
 5 Q. -- and that you know that outcomes from it were fed in.
 6 The inquiry is keen to know to what extent information
 7 from Exercise Winchester Accord was known to the ODU, so
 8 could we invite you, without putting you on the spot
 9 now, when you leave today, in the next days or week. To
 10 do some research into that and to produce a statement
 11 that addresses the issue?
 12 A. I can, certainly .
 13 Q. Thank you very much indeed, Mr Thomas.
 14 We're going to get to your summary of the 2017
 15 guidance in due course and then we'll look at some parts
 16 of the guidance itself . But first of all , one question
 17 that may be occurring to people is that the new guidance
 18 is published in March 2017. The attack at Manchester
 19 occurred towards the end of May 2017. Was there
 20 sufficient time for GMP to gear up to the new guidance?
 21 I'm not asking you to express a view about that, I'm
 22 simply identifying the existence of a question that
 23 might reasonably be asked.
 24 Was the refreshed guidance circulated to all UK
 25 police forces?

1 A. It was, sir , yes.
 2 Q. Did that occur on 23 March 2017?
 3 A. It did, together with a covering letter from
 4 Chief Constable Francis Habgood on behalf of CT Policing
 5 Headquarters?
 6 Q. That letter was dated 23 March, is that correct?
 7 A. It was, yes. There was a mistake on the date of that
 8 letter , 2015.
 9 Q. Which I have just spotted, which was confusing me for
 10 a moment.
 11 A. That was a mistake, sir.
 12 Q. Can we have that letter on the screen? Mr Lopez, care
 13 needs to be taken over this, so don't put it on the
 14 screen until you've heard what I have to say. The
 15 reference is {INQ016686/1}. This is the letter. I do
 16 not want on the screen, please, any part of the letter
 17 beneath the line that reads:
 18 "The review team have also engaged with HMIC in
 19 respect of the emerging learning from their recent CT
 20 and MTFA preparedness inspections."
 21 Nothing on the screen below that. I am told that
 22 the location of the next line down is operationally
 23 sensitive . I don't understand why since it's on the
 24 internet , but for the time being we'll respect that.
 25 SIR JOHN SAUNDERS: While that is being done. I have looked

1 at my note and the word "must inform other emergency
 2 services" came from your question, which was agreed by
 3 the witness. Depending on my note being entirely
 4 accurate, which it may not be, that may be where it came
 5 from. I don't think it actually makes any difference
 6 whether it's "should" or "must".
 7 MR GREANEY: I entirely agree, sir, given the context.
 8 (Pause).
 9 Not to worry, Mr Lopez, I'll read out the important
 10 part. I've got a hard copy here. The correct date is
 11 23 March 2017, so two calendar months before the arena
 12 attack:
 13 "Dear colleague [writes the chief constable].
 14 Update on the national Plato guidance. My purpose in
 15 writing to you is to share with you the new national
 16 Plato guidance for UK policing. In light of the
 17 terrorist attack in London yesterday [so that was
 18 Westminster Bridge] I would encourage you to commission
 19 an urgent review of your local Plato response plans
 20 against this new national guidance [which was attached].
 21 You will see that the refreshed guidance includes
 22 sections relating to operational staff and supervisors,
 23 control room staff and firearms commanders."
 24 SIR JOHN SAUNDERS: I'm sorry, I think Mr Lopez, you may be
 25 unmuted at the moment, which is causing us to hear

1 various slightly strange noises, which are a bit
 2 distracting . Thank you.
 3 MR GREANEY: Thank you, sir.
 4 I'll read out the part that I'm going to
 5 particularly emphasise for reasons that will be obvious:
 6 "I would encourage you [said
 7 Chief Constable Habgood] to commission an urgent review
 8 of your local Plato response plans against this new
 9 national guidance."
 10 So that is or may be relevant to how quickly forces
 11 should have been gearing up to the new guidance.
 12 A. Yes, sir .
 13 SIR JOHN SAUNDERS: We're not seeing the whole letter for
 14 perfectly good reasons, but would that also have
 15 encouraged training to take place quickly? The new
 16 guidance presumably would have required training.
 17 A. It did, sir , yes.
 18 SIR JOHN SAUNDERS: And the letter says that somewhere, does
 19 it ?
 20 A. I believe that it does because it makes a reference to
 21 the workshops that we subsequently held, which again
 22 I think Mr Greaney is going to take me to.
 23 SIR JOHN SAUNDERS: Thank you.
 24 MR GREANEY: It's an entirely understandable point. It does
 25 refer to planning seminars that were to be carried out

1 in May that we're going to come on to look at, and it
 2 reads:
 3 "NCTPHQ continue to work with the College of
 4 Policing and others on the development of a national
 5 training product for control room staff which will
 6 utilise the refreshed guidance as its basis. Further
 7 information in this regard will be provided at the
 8 forthcoming seminar."
 9 And:
 10 "To further embed this new Plato guidance we have
 11 secured the agreement of the College of Policing that
 12 they will include a relevant session within this year's
 13 mandatory national refresher training package for all
 14 firearms commanders and tactical advisers."
 15 So we're going to turn on next to deal with the
 16 content of the 2017 guidance. This would be
 17 a convenient moment for our morning break.
 18 SIR JOHN SAUNDERS: Right. Quarter of an hour?
 19 MR GREANEY: Yes, please.
 20 SIR JOHN SAUNDERS: So that's just before 11.30.
 21 (11.14 am)
 22 (A short break)
 23 (11.31 am)
 24 MR GREANEY: Mr Thomas, what we'll do next is receive your
 25 evidence about the 2017 guidance in summary and then

1 we'll look at a small number of passages within the
 2 guidance itself .
 3 A. Yes.
 4 Q. From 2017, March of that year, whilst Operation Plato
 5 remained as the agreed national identifier for the
 6 response to a no-notice MTFA, did the version of the
 7 guidance recognise that a terrorist attack might take
 8 the form of a combination of attack methodologies?
 9 A. It did, yes.
 10 Q. So that it might be difficult initially to identify
 11 whether the incident was an MTFA or
 12 a non-firearms-related marauding attack?
 13 A. Yes, as we discussed earlier .
 14 Q. Indeed. Was it also noted in the refreshed guidance
 15 that less sophisticated attacks might be the beginning
 16 of or a precursor for more complex attacks?
 17 A. Yes.
 18 Q. As a consequence, was it acknowledged that during
 19 non-firearms-related marauding terrorist attacks, the
 20 guidance contained within the new document would still
 21 assist in delivering an effective coordinated response
 22 and it might be appropriate to declare Operation Plato
 23 for any form of marauding terrorist attack?
 24 A. Yes.
 25 Q. As with the 2012 guidance, did the 2017 guidance

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1 recognise that indications that an MTFA was underway
 2 could include reports of a number of different things?
 3 A. It did.
 4 Q. Multiple subjects?
 5 A. Yes.
 6 Q. So did that mean multiple potential attackers?
 7 A. Yes.
 8 Q. Multiple sites of attack simultaneously or in close
 9 succession?
 10 A. Yes.
 11 Q. Indiscriminate attacks designed to cause mass
 12 casualties?
 13 A. Yes.
 14 Q. The targeting of so-called soft targets and particularly
 15 crowded public areas or events?
 16 A. Yes.
 17 Q. The use of improvised explosive devices?
 18 A. Yes.
 19 Q. As had been identified in 2012, subjects shouting
 20 religious or ideological slogans or remarks?
 21 A. Yes.
 22 Q. And a high volume of calls into the emergency services
 23 from the public?
 24 A. Yes.
 25 Q. In 2017 did it continue to be the case that the

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1 declaration of Operation Plato triggered a multi-agency
 2 response?
 3 A. Yes, very much so.
 4 Q. What was that designed to achieve?
 5 A. So that it was a coordinated response from all three
 6 emergency services in order to give us the best possible
 7 chance to save life .
 8 Q. Did it continue to be the case from 2017 that whilst any
 9 member of any emergency service could report that they
 10 believed an MTFA was underway, only a relevant police
 11 commander could declare Operation Plato?
 12 A. Yes.
 13 Q. The way in which you put it in your statement, and we'll
 14 look at the language of the guidance itself -- sir, I'm
 15 at page 5 -- is that when Plato is declared, the police
 16 are responsible for notifying their local ambulance and
 17 fire and rescue service control rooms as soon as
 18 possible --
 19 A. Yes, that's right .
 20 Q. -- because this assists with the activation of all three
 21 emergency services' contingency plans in a coordinated
 22 manner?
 23 A. Yes.
 24 Q. This declaration and initial command of the response is
 25 likely , you say, to be undertaken by the initial

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1 tactical firearms commander, the ITFC, located in the
 2 relevant police force control room?
 3 A. Yes.
 4 Q. Given the way in which you've expressed it in your
 5 statement, you don't seem to accommodate the possibility
 6 that it would ever be appropriate for a police commander
 7 to declare Operation Plato and then not tell the partner
 8 emergency services about it. Is that a fair way of
 9 reading what you have said?
 10 A. Yes, it is. I struggle to foresee a set of
 11 circumstances where that wouldn't be the case.
 12 Q. And you add that:
 13 "The ITFC [who in the circumstances of Manchester
 14 was the FDO] should utilise the national decision model
 15 in order to respond appropriately to the threat."
 16 A. Yes, again just as we were discussing prior to the
 17 break.
 18 SIR JOHN SAUNDERS: It may be we're going to look at the
 19 actual -- and so this may be an unnecessary question,
 20 but from the statement, there's a change in terminology
 21 of the particular police officer who can declare
 22 Operation Plato.
 23 A. Yes.
 24 SIR JOHN SAUNDERS: Is that true?
 25 A. Yes. There was a change from the 2012 guidance to the

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1 2017 around that. It was a subtle change of language
 2 just to reflect that it may not on all occasions always
 3 be the FCR inspectors, as I think it was referred to
 4 in the 2012 guidance. It just broadened the terminology
 5 just to be more encompassing for all policing
 6 organisations in the UK.
 7 SIR JOHN SAUNDERS: Thank you.
 8 MR GREANEY: Under the 2017 guidance, was it the ITFC who
 9 held responsibility for setting the initial police
 10 strategy?
 11 A. Yes, that's in line with the armed policing authorised
 12 professional practice, so the practice that drives how
 13 we as the police service do business around all firearms
 14 operations.
 15 Q. The way in which you express it is:
 16 "The overarching strategic aim under the 2017
 17 guidance should be the preservation of life and
 18 neutralising the ongoing threat."
 19 A. That's correct.
 20 Q. Is it the position that in order to achieve that
 21 overarching strategic aim, it was expected that the
 22 armed policing response would be to identify, locate and
 23 confront subjects to achieve, as it's put, the
 24 neutralisation of the threat?
 25 A. Yes, that's right.

1 Q. Was it the position from 2017 that in order to achieve
 2 the overarching strategic aim the initial police
 3 strategy for an Operation Plato incident might include
 4 a number of things?
 5 A. Yes, that was an indicative strategy that was contained
 6 within the guidance to assist commanders in determining
 7 a specific strategy for the event that was unfolding in
 8 front of them.
 9 Q. I'm at the bottom of page 5 of your statement. What
 10 factors were identified in the guidance?
 11 A. So this is in a hierarchical order:
 12 "To minimise the risk to the public; to maximise the
 13 safety of the police, ambulance and fire and rescue
 14 service responders; to follow the principles of joint
 15 working, sharing of information and the joint assessment
 16 of risk to inform decision-making within the
 17 multi-agency response; where possible to support the
 18 evacuation and treatment of casualties; where possible,
 19 arrest offenders in order to bring them to justice and
 20 to support the judicial system; to secure and preserve
 21 evidence for quick time forensic opportunities and
 22 support post-incident investigations, criminal
 23 proceedings and inquiries; and to assist in the return
 24 to normality and reassure the public."
 25 Q. What did the guidance have to say about the need to

1 review the declaration of Operation Plato?
 2 A. That it should be kept under constant review and indeed
 3 it should be specifically reviewed when a strategic
 4 firearms commander or SFC is appointed.
 5 Q. Why is that a particular point of review?
 6 A. Because the strategic firearms commander is in normal
 7 circumstances responsible for the strategy, the
 8 strategic direction of an operation. However, in the
 9 very early stages of a no-notice incident, it's accepted
 10 and recognised that the person fulfilling the role of
 11 the initial tactical firearms commander will have to
 12 discharge the responsibilities of both the tactical
 13 firearms commander and the strategic firearms commander
 14 because one isn't immediately available to them. So
 15 they are, as the tactical commander, setting their own
 16 initial working strategy. So as soon as the strategic
 17 firearms commander is appointed, one of their key
 18 responsibilities is to review that strategy and ensure
 19 that it is appropriate and fit for purpose.
 20 Q. So keep it under constant review, but with a particular
 21 point of review being when the SFC is contacted because
 22 the SFC will be in a position to review, agree, disagree
 23 or amend the strategy?
 24 A. Correct, their strategy.
 25 Q. Does the guidance further provide that all unarmed

1 initial police responders will need clear direction and
 2 guidance from the ITFC?
 3 A. Yes.
 4 Q. And to assist with that, should all of those concerned,
 5 so the ITFC, control room staff, operational
 6 supervisors, officers and staff be familiar with the
 7 Stay Safe guidance to which you've referred already?
 8 A. Yes, indeed.
 9 Q. In your statement you observe that:
 10 "Forces should ensure that all operational
 11 supervisors and commanders are aware of the meaning of
 12 Operation Plato and the Stay Safe guidance."
 13 A. Yes, indeed. You'll recall that that was one of the
 14 points picked up by HMICFRS in the report that we looked
 15 at earlier.
 16 Q. So that one most certainly should not have a situation
 17 in which those fulfilling, let's take Gold, Silver and
 18 Bronze commander roles are unaware of what
 19 Operation Plato is?
 20 A. That's correct.
 21 Q. Does the guidance go on to provide that for MTFAs
 22 attacks and similar methodologies, ITFCs should deploy
 23 firearms assets immediately?
 24 A. Yes.
 25 Q. And that operational firearms commanders, OFCs, should

1 be responsible for making an immediate assessment as to
 2 whether their operational objectives are achievable with
 3 the resources that they have at their disposal?
 4 A. That's correct.
 5 Q. I'm over the page now at page 7. Did the national
 6 guidance also emphasise the importance of employing
 7 a police commander to undertake the role of
 8 ground—assigned TFC, tactical firearms commander, in
 9 a timely manner?
 10 A. Yes, and to assume the role of the on—scene commander.
 11 Q. Is a ground—assigned tactical command function in
 12 conjunction with the control room based command function
 13 deemed by the guidance essential in order to develop
 14 what's called command situational awareness?
 15 A. It is indeed.
 16 Q. Along with the overall ability to resolve the incident
 17 and to meet the requirements of the on—scene
 18 multi—agency approach?
 19 A. Yes.
 20 SIR JOHN SAUNDERS: Can we just go back, I'm sorry, to an
 21 answer you just gave? You're saying there should be
 22 a ground—assigned tactical firearms commander. Can you
 23 repeat what you said about what he had to do?
 24 A. To undertake the role of the police on—scene commander.
 25 That's the terminology that is used in the tri—service

1 joint operating principles, the JOPs.
 2 SIR JOHN SAUNDERS: So the on—site police commander?
 3 A. On scene.
 4 SIR JOHN SAUNDERS: On scene, sorry.
 5 Thank you.
 6 MR GREANEY: I indicated that we'd look at just some parts
 7 of the guidance itself, which, as you said earlier, is
 8 a much more substantial document than the 2012 guidance.
 9 A. Yes.
 10 Q. The reference is {INQ016688/1} and we'll start at
 11 page 3, please {INQ016688/3}.
 12 Paragraph 1.4:
 13 "Operation Plato is the agreed national identifier
 14 for the response to a no—notice marauding terrorist
 15 firearms attack. This terminology has been adopted by
 16 key agencies including the police, ambulance service,
 17 fire and rescue, military, National Health Service,
 18 local and Central Government departments."
 19 SIR JOHN SAUNDERS: Before you go on, just for my benefit,
 20 and this may be difficult in certain circumstances,
 21 can you just identify the parts of the document you read
 22 out which are new?
 23 MR GREANEY: Yes.
 24 SIR JOHN SAUNDERS: There may be a variation, I do
 25 understand that, but it's helpful to know what was not

1 in the 2012.
 2 MR GREANEY: I'll do my best and in any event we'll carry
 3 out that comparison in due course.
 4 SIR JOHN SAUNDERS: It may be Mr Thomas will know it off the
 5 top of his head anyway.
 6 A. I'll understand the majority of it, sir, I think.
 7 MR GREANEY: 1.4 is not new.
 8 A. No, it's not.
 9 Q. 2.1:
 10 "The primary purpose of this guidance is to assist
 11 forces in reviewing and developing their contingency
 12 plans for responding to an MTFA. It will also support
 13 a consistent and interoperable approach across forces."
 14 That, I think, probably is new.
 15 A. That might be just a slight variation of wording that
 16 was previously in the 2012 guidance, I believe.
 17 Q. The reason I suggest it might be new is because the need
 18 for consistency of course is something that the
 19 inspectorate had identified.
 20 A. It had.
 21 Q. At all events, we'll check that.
 22 {INQ016688/4}, the bottom half of that page, please.
 23 Paragraph 3.3, I think this is new, but you'll tell
 24 me if I'm wrong:
 25 "It is important that forces recognise that an MTFA

1 will be an extraordinary event with unprecedented
 2 demands placed upon all aspects of the policing (and
 3 emergency services partners) response."
 4 A. That's correct, and I do believe it's new.
 5 Q. Over the page, {INQ016688/5}, the top half of that page,
 6 please.
 7 (Pause)
 8 Is there a problem, Mr Lopez? We were looking at
 9 {INQ016688/5}, the top of that page.
 10 I think the part I'm going to draw attention to is
 11 new. Paragraph 3.5:
 12 "Forces should give consideration to having specific
 13 Operation Plato response plans for any
 14 significant /high—profile crowded places within their
 15 policing area."
 16 A. That's correct.
 17 Q. Is that new?
 18 A. I believe it is, yes.
 19 Q. "Such site—specific considerations may include the ready
 20 availability of detailed site plans and local CCTV
 21 system connectivity within the relevant police control
 22 rooms; site familiarity visits for relevant armed
 23 officers and commanders; and an understanding by police
 24 of the venues' own MTFA contingency plans."
 25 A. Yes.

1 Q. So what was that designed to capture?
 2 A. So that for those locations that an individual force
 3 would identify as being at potentially increased risk of
 4 an MTFA, that they have an enhanced understanding of how
 5 they would respond to that location.
 6 Q. I don't know the answer to this question, but would you
 7 expect that that would apply to somewhere like an arena
 8 or a football stadium?
 9 A. It may be, but that would be driven by the number of --
 10 that type of venue that was in any given police force
 11 because clearly it would not be possible to achieve that
 12 with a large number of locations, so police forces would
 13 need to do some form of risk assessment locally to
 14 determine what would be captured within that tranche of
 15 locations.
 16 Q. Why would it depend upon the number of such locations in
 17 a force area, because it might be thought that doesn't
 18 reduce the risk to any particular venue?
 19 A. No, but it's just about the achievability of having such
 20 plans in place.
 21 Q. Right. So you would expect a risk assessment to be
 22 carried out by the force --
 23 A. Yes.
 24 Q. -- in order to identify a hierarchy of such venues
 25 within their local area?

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1 A. To identify those locations where they felt it was
 2 appropriate to undertake that activity, yes.
 3 Q. {INQ016688/6} next, please, the middle of the page.
 4 (Pause)
 5 I'm told we need to have what I very much hope will
 6 be a short break.
 7 (11.52 am)
 8 (A short break)
 9 (12.03 pm)
 10 MR GREANEY: Sir, what those watching may or may not be
 11 aware of is that Mr Lopez, who displays things on the
 12 screen, is not present in the hearing room with us for
 13 a reason that has been explained to me. His internet
 14 has failed at the location he's at. That's been the
 15 problem, not the fault of anyone here.
 16 Mr Suter has agreed to step into the breach, or at
 17 least attempt to do so, by showing documents on the
 18 screen.
 19 (Pause)
 20 Where we were, we were looking at some of -- a small
 21 number of individual passages from the guidance itself
 22 and there is now on the screen what I wanted, which is
 23 page 7, paragraph 4.3:
 24 "The declaration of an Operation Plato incident
 25 triggers a multi-agency response designed to rapidly

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1 inform, mobilise and operationally deploy the most
 2 appropriate resources in order to identify, locate,
 3 confront and neutralise the threat and save life. In
 4 order to support an effective response, it is important
 5 that the relevant partner agencies and specialist
 6 national assets are informed as a priority."
 7 A. That's correct.
 8 Q. So the language may be a little different, but the
 9 intention is exactly the same as in 2012?
 10 A. Yes.
 11 Q. And, as we've agreed already, doesn't seem to leave much
 12 discretion, if any, in relation to informing partner
 13 agencies?
 14 A. Agreed.
 15 Q. {INQ016688/8} next, please, Mr Suter, and the top half
 16 of that page, paragraphs 4.6 and 4.7. Thank you very
 17 much indeed. This is working well:
 18 "Personnel from any of the emergency services may
 19 report a suspected Plato incident But only the police
 20 can declare a Plato incident."
 21 That is consistent with 2012?
 22 A. It is.
 23 Q. 4.7:
 24 "If an Operation Plato is declared and it
 25 subsequently becomes apparent that the incident is not

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1 an MTFA then the officer who is undertaking the role of
 2 the TFC must redefine the incident immediately and
 3 ensure that all relevant personnel and agencies are
 4 informed."
 5 Again, the language may be a little different but
 6 it's the same concept?
 7 A. It is.
 8 Q. Next, please, Mr Suter, {INQ016688/11}. The bottom half
 9 of the page under "Immediate actions". There are then
 10 set out -- just above that it reads:
 11 "The following list of immediate actions on
 12 responding to an Operation Plato declaration is designed
 13 to offer forces guidance in relation to the hierarchy of
 14 actions. The hierarchical list is not prescriptive, but
 15 offers a structure which broadly identifies the main
 16 actions and their urgency."
 17 And under "Immediate actions" there's a list, we
 18 don't need to go through each of them, but amongst them,
 19 although not at or nearly at the top of the list, on
 20 {INQ016688/13}, the bottom half of the page, please.
 21 SIR JOHN SAUNDERS: In passing we notice "inform
 22 SO15 Reserve", which we heard yesterday.
 23 MR GREANEY: We did, sir.
 24 "Contact ambulance and fire and rescue control
 25 rooms. Police control rooms should set up continuous

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1 open communications with ambulance and FRS control
 2 rooms. They should also request command attendance
 3 at the relevant police control/operations room."
 4 And what does that mean: they should also request
 5 command attendance at the relevant police
 6 control/operations room?
 7 A. That's about ensuring that you have tactical commanders
 8 from all three emergency services co-located both at the
 9 scene but also in an appropriate operations room. The
 10 operations room element of that is sometimes referred to
 11 as the tactical coordinating group or the TCG.
 12 Q. Yes, and we've already heard about the TCG and indeed
 13 the SCG.
 14 A. Yes.
 15 Q. So the first part of that, open communications, is not
 16 new, but you'll correct me if I'm wrong, the second
 17 part, the co-location of commanders in a relevant
 18 control room, that I think is new in the 2017 guidance?
 19 A. It is.
 20 Q. That paragraph, which has just gone from the screen,
 21 tells us that we should go to section 11 for more
 22 information, so we'll do that, which takes us to
 23 {INQ016688/22}, please, Mr Suter.
 24 SIR JOHN SAUNDERS: Does this document go to the fire
 25 service as well and the ambulance service?

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1 A. I believe this was shared for consultation purposes with
 2 the national leads for the fire and ambulance that sit
 3 on the Joint Operational Principles Working Group, but
 4 it wouldn't be shared with individual agencies on
 5 a local level.
 6 MR GREANEY: Section 11, "Ambulance service and fire and
 7 rescue service initial Operation Plato response":
 8 "An Operation Plato incident demands that the
 9 emergency services follow the principles of joint
 10 working as defined in the 'Joint Operating Principles --
 11 Responding to a Marauding Terrorist Firearms Attack and
 12 Terrorist Siege' guidance."
 13 11.3:
 14 "When the initial TFC identifies and declares an
 15 Operation Plato incident they will be responsible for
 16 notifying their local ambulance and FRS control rooms as
 17 soon as possible. This will assist with the activation
 18 of contingency plans and also assist in minimising the
 19 risk to emergency service responders who may not be
 20 aware that an MTFA is occurring in their area."
 21 Then there is reference to the link. 11.6:
 22 "Early coordinated decision-making will enable
 23 certain key responses to take place: identification of
 24 an emergency services RVP."
 25 A. Rendezvous point.

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1 Q. Does that mean a rendezvous point for all of the
 2 emergency services?
 3 A. Yes.
 4 Q. "Identification of a suitable forward command post (FCP)
 5 for specialist emergency service personnel."
 6 A. Correct.
 7 Q. Over the page {INQ016688/23}, please, Mr Suter:
 8 "Joint dynamic decision-making process leading to
 9 the identification of hot, cold and warm zones and an
 10 agreed tactical plan to treat and evacuate casualties."
 11 A. That's correct.
 12 Q. Could you explain to us what the hot, cold and warm
 13 zones are in terms of Operation Plato?
 14 A. Yes. They are descriptors that are used to identify the
 15 level of risk within certain areas of the activity and
 16 to enable -- that will enable commanders to make
 17 decisions about which resources they deploy into which
 18 areas. So the hot zone is where it is believed the
 19 attackers are and where, to be blunt, the killing is
 20 taking place. The warm zone is where the attackers are
 21 believed to have passed through but could possibly
 22 re-enter, so there is still an element of risk from
 23 those attackers in the warm zone. And the cold zone is
 24 where it's assessed to be safe for all of the emergency
 25 services to operate as they would normally.

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1 Q. So who may enter a hot zone?
 2 A. The hot zone, as defined in this guidance at the time,
 3 bearing in mind that this was about the response to
 4 a marauding terrorist firearms attack, the guidance was
 5 that only armed police officers should enter that area
 6 for obvious reasons.
 7 Q. Who may enter a warm zone?
 8 A. Again, a decision for the commanders as to who should
 9 enter a warm zone. At the stage of this guidance, it
 10 recognised that unarmed police officers, together with
 11 armed police officers, may be operating in the warm
 12 zone, and it did enable fire and rescue and ambulance
 13 commanders to deploy people into the warm zone if they
 14 felt it was appropriate to do so. But at the point of
 15 writing this guidance it was understood, for obvious
 16 reasons, that there was a different appetite of risk, if
 17 I can use that term, between the deployment of
 18 non-specialist responding police and non-specialist
 19 responding ambulance and fire service personnel.
 20 Q. What do you mean by that?
 21 A. So by the nature of policing, it is understood that at
 22 times police officers, be they armed or not, may need to
 23 deploy into areas of danger where there is a threat and
 24 potentially, depending on the circumstances, to be
 25 involved in confronting and neutralising that threat.

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1 So the guidance was intended to give flexibility to
 2 commanders based upon their national
 3 decision-making-based assessment of what was going on
 4 at the time as to whether they wished and thought it
 5 appropriate to deploy unarmed resources into that warm
 6 zone.
 7 Q. It appeared that you were drawing a distinction or
 8 potential distinction between on the one hand police
 9 officers who might have an expectation or be expected to
 10 put themselves in positions of risk and other emergency
 11 service responders?
 12 A. Yes, in terms of where there is a firearms risk, and
 13 it's about confronting threat, there was a different
 14 understanding of what could be expected from the
 15 emergency services in line with the way that the
 16 emergency services do operate. So as I've said
 17 previously, depending on the circumstances, commanders
 18 may ask unarmed police officers to undertake certain
 19 activity in the warm zone.
 20 SIR JOHN SAUNDERS: It sounds a bit like one has to have
 21 a group discussion about this and at times of emergency
 22 is that very desirable?
 23 A. In terms of the deployment of police resources, that
 24 would be a decision for the tactical commander at the
 25 time. So whilst they may well engage in discussion to

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1 achieve that joint understanding of risk and joint
 2 situational awareness, the decision about which police
 3 resources are deployed into which zones sits with the
 4 tactical commander from the police service.
 5 SIR JOHN SAUNDERS: I was more concerned with the others,
 6 the ambulance and the fire.
 7 A. Again, the joint operating principles, the JOPs,
 8 together with the Plato guidance, outline that that
 9 joint decision-making and that shared situational
 10 awareness will hopefully inform an appropriate
 11 deployment of staff. We should be acting together in
 12 order to protect and save life and we have the best
 13 chance of achieving that if we work together. So it's
 14 articulating that the commanders therefore should, where
 15 that is achievable, come together, have that discussion
 16 and make those joint decisions about how best to respond
 17 to this incident.
 18 MR GREANEY: I'm just going to complete the picture
 19 in relation to the guidance itself. Can we have
 20 {INQ016688/23} back on the screen, please, Mr Suter?
 21 Thank you.
 22 Paragraph 12.2:
 23 "This strategy [so the initial police strategy]
 24 should be regularly reviewed, particularly at the point
 25 an SFC is contacted and in a position to review, agree

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1 or amend the strategy and any tactical parameters set."
 2 This is what you told us about earlier, as is
 3 paragraph 12.6:
 4 "This position will be kept under constant review as
 5 at any point the situation could change and the
 6 information indicate that containing in order to
 7 negotiate may be the most appropriate and proportionate
 8 response."
 9 A. That's correct.
 10 Q. Next, I want to ask you, please, about the topic of
 11 embedding the 2017 guidance. You touched upon this
 12 already. We've looked at the letter of 23 March 2017,
 13 I'm at page 7 of your first statement. Were steps taken
 14 to assist forces in embedding locally the changes to the
 15 national structure?
 16 A. Yes, they were, sir.
 17 Q. What were those steps?
 18 A. That was the delivery of two seminars or workshops where
 19 representatives from all police forces across the UK
 20 were invited. I believe that there were six places
 21 allocated to every force to attend at a central venue
 22 and have the opportunity to speak with the authors of
 23 the national guidance, to also speak with the individual
 24 who had created a training pack for police control rooms
 25 in respect of response to an MTFA, and also to speak to

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1 the person responsible for the creation of the mandatory
 2 national firearms command training package for that
 3 year, which was also going to focus on the response to
 4 an MTFA.
 5 Q. So the seminars, I think, took place on Monday, 8 May
 6 and Thursday, 11 May 2017.
 7 A. They did.
 8 Q. And during those seminars, just to pull the strands of
 9 what you have said together, delegates were provided
 10 with a detailed overview of the new national guidance?
 11 A. Yes.
 12 Q. And that included the opportunity to ask questions of
 13 you and Inspector Mark Nutter, who had also been
 14 involved in devising the refreshed guidance?
 15 A. He had.
 16 Q. And the delegates also received a briefing on a new
 17 national training product for control room staff;
 18 is that right?
 19 A. That's correct.
 20 Q. Which was delivered by an officer of North Yorkshire
 21 police, Iain Sirrell, who in fact is one of the
 22 inquiry's policing experts?
 23 A. That's correct.
 24 Q. And there was a session on the 2017 mandatory national
 25 refresher training package for all firearms commanders

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1 and tactical advisers which featured the new Plato
2 guidance?
3 A. That's correct.
4 Q. As you said, a maximum of six places were allocated to
5 each force, and was it suggested that force
6 representatives should include the planner tasked with
7 the development and maintenance of the local Plato
8 response plan?
9 A. Yes.
10 Q. Those responsible for the training of control room
11 staff?
12 A. Yes.
13 Q. And those responsible for local delivery of the College
14 of Policing annual mandated firearms command training
15 package?
16 A. That's correct.
17 Q. And you have, I believe, checked the records of CTPHQ
18 and established that members of GMP staff attended this
19 seminar on 8 May 2017?
20 A. That's correct, according to our records.
21 Q. Those persons being Inspector Simon Lear and
22 Sergeant David Whittell of Firearms Command Training?
23 A. That's correct.
24 Q. And we'll hear from Mr Whittell next week, I believe.
25 Laura Lewis, the force command module manager?

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1 A. Yes.
2 Q. Christopher Steadman—Byrne of the operational
3 communications branch of GMP?
4 A. Yes.
5 Q. And Jo Hoyte of the North—west Counter—terrorism Unit,
6 as it was then known?
7 A. Yes.
8 Q. During the session on new national guidance did you and
9 Inspector Nutter talk delegates through the detail of
10 a number of sections of the document?
11 A. Yes, we did.
12 Q. Giving them an opportunity to ask questions and seek any
13 clarification ?
14 A. Yes.
15 Q. In your statement you deal with a number of further
16 specific issues that you've been asked to address.
17 I don't think it is necessary for me to take you through
18 those.
19 Subsequently, to move on to a separate but connected
20 topic, between June and August of 2017, so after the
21 arena attack, did staff from CTP headquarters'
22 specialist and CT armed policing capabilities unit, so
23 your unit, conduct assurance visits to all forces in the
24 United Kingdom?
25 A. We did.

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1 Q. What was the purpose of those visits?
2 A. To support forces in ensuring that the new guidance was
3 fully embedded within all their local procedures and
4 policies .
5 Q. Was Greater Manchester Police visited in accordance with
6 that scheme on 19 July 2017?
7 A. It was.
8 Q. I'm moving next to your second statement, where you deal
9 with a number of issues, but including the assurance
10 visit .
11 Sir, this is from paragraph 4 of the second
12 statement.
13 Did Inspector Nutter, one of the authors of the
14 refreshed guidance, conduct the visit to GMP?
15 A. He did.
16 Q. Did he meet with Chief Inspector Mike Booth of the GMP
17 operational communications branch?
18 A. Yes.
19 Q. And a gentleman to whom we've just referred,
20 Inspector Simon Lear of the GMP firearms command
21 training unit?
22 A. Yes, that's correct .
23 Q. As part of the process of the assurance visit , did
24 Inspector Nutter use a pro forma?
25 A. He did.

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1 Q. So effectively , he went through a series of categories ,
2 I suppose, to see how GMP was coping or satisfying the
3 requirements of the new guidance?
4 A. That's correct, yes.
5 Q. You may not know the answer to this question, if you
6 don't perhaps you'd check, but did the work that was
7 done by Inspector Nutter on that occasion focus on the
8 Plato plan that was in place at that stage in July or
9 was it also considering the position on 22 May?
10 A. No, this was a review of where they were at that moment
11 in time.
12 Q. Okay. That's very helpful, thank you.
13 At that moment in time, so 19 July 2017, did
14 Inspector Nutter identify that GMP had undertaken
15 a number of activities and/or had arrangements in place
16 in respect of many of the listed areas of relevance?
17 A. He did.
18 Q. I will run through these out of fairness to GMP. GMP
19 had a single identifiable Plato plan?
20 A. Yes.
21 Q. It followed the national guidance template?
22 A. It did.
23 Q. The force plan was easily accessible to all relevant
24 staff?
25 A. Yes.

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1 Q. A force review of the Plato plan had taken place?
 2 A. Yes.
 3 Q. I don't think the work of Inspector Nutter identified
 4 when that review had taken place.
 5 A. No.
 6 Q. Specific plans existed for iconic sites in the force
 7 area?
 8 A. Yes.
 9 Q. A senior officer had been identified to lead on
 10 Plato—related issues?
 11 A. Yes.
 12 Q. The plan listed the indication criteria for both MTFA
 13 and less sophisticated attacks and, as it was put, takes
 14 cognisance of the different response requirements?
 15 A. Correct.
 16 Q. The plan recognised the difference between the
 17 terminology MTFA and Operation Plato?
 18 A. Yes.
 19 Q. There was a review process for the plan?
 20 A. Yes.
 21 Q. Control room staff awareness of the need to triage calls
 22 in line with the strategic aim of identify and locate
 23 was clear?
 24 A. Yes.
 25 Q. A mechanism was in place for call—taker awareness

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1 raising in relation to the MTFA indicators?
 2 A. Yes.
 3 Q. Control room staff were aware of the Stay Safe guidance?
 4 A. Yes.
 5 Q. And control rooms had dynamic access to relevant CCTV
 6 systems?
 7 A. That's correct.
 8 Q. In relation to those requirements of the local plan,
 9 those boxes, if I can put it this way, were ticked?
 10 A. Yes.
 11 Q. In relation to control room immediate actions, the
 12 following were satisfied. The need to declare Plato?
 13 A. Yes.
 14 Q. The need to provide Stay Safe advice to unarmed
 15 responders?
 16 A. Yes.
 17 Q. To deploy local firearms resources?
 18 A. Yes.
 19 Q. Consider the requirement for regional firearms support?
 20 A. Yes.
 21 Q. Contact the national CTSFO network on—call coordinator?
 22 A. Yes.
 23 Q. Inform the MPS counter—terrorism command in order to
 24 notify the SNC?
 25 A. Yes.

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1 Q. Mr Basu, of course?
 2 A. Yes.
 3 Q. Inform the OSCT within the Home Office?
 4 A. Yes.
 5 Q. Contact the local ambulance and fire and rescue service
 6 control rooms to establish the three—way dynamic
 7 communication link between those control rooms?
 8 A. Yes.
 9 Q. Set an initial strategy recognising the specific
 10 requirements of responding to an MTFA?
 11 A. Yes.
 12 Q. The need to have the ability to mobilise
 13 a ground—assigned tactical firearms commander on a 24/7
 14 basis?
 15 A. Yes.
 16 Q. The need to have the ability to contact a strategic
 17 firearms commander on the same 24/7 basis?
 18 A. Yes.
 19 Q. With that person able to discharge their
 20 responsibilities within a Plato response?
 21 A. That's correct.
 22 Q. The need to have immediate access to an Airwave
 23 communications tactical adviser?
 24 A. Yes.
 25 Q. And to contact the force media or communications

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1 department and activate an early public warn and inform
 2 process?
 3 A. Yes.
 4 Q. The need to contact the regional CT policing unit?
 5 A. Yes.
 6 Q. And the need for general awareness of the national
 7 strategic response and the requirement of local force
 8 contact with, as it was described, or they were
 9 described, national stakeholders?
 10 A. That's correct.
 11 Q. Under the heading on the pro forma "Initial unarmed
 12 response considerations" as of 19 July 2017, were the
 13 following satisfied by GMP? That the Plato plan
 14 referred specifically to the role of unarmed responders?
 15 A. Yes.
 16 Q. That unarmed responders were included within the initial
 17 strategy and their potential role in helping to identify
 18 and locate the attacker was recognised?
 19 A. Yes.
 20 Q. Plato awareness training and familiarisation for unarmed
 21 responders had been delivered?
 22 A. Yes.
 23 Q. Under the heading "Command and control arrangements",
 24 did GMP satisfy the following? It had a workable plan
 25 to deploy a ground—assigned tactical firearms commander?

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1 A. Yes.
 2 Q. A strategic firearms commander was readily available on
 3 a 24/7 basis?
 4 A. Yes.
 5 Q. The role of the OFC was clearly set out in the force
 6 plan?
 7 A. Yes.
 8 Q. Command decision—making and auditable recording
 9 including the use of audio—recording device arrangements
 10 were in place?
 11 A. They were.
 12 Q. And JESIP interoperability principles were embedded
 13 in the force plan to aid joint decision—making?
 14 A. That's correct.
 15 Q. Finally, under the heading "General considerations", did
 16 GMP satisfy these criteria? The force plan contained
 17 a section on how to access military explosive ordnance
 18 disposal, EOD, capabilities?
 19 A. It did.
 20 Q. The plan contained a section on informing and accessing
 21 support from the National Police Air Service?
 22 A. Yes.
 23 Q. The plan outlined and relevant staff were aware of the
 24 process for external police force armed resources radio
 25 call signs?

1 A. Yes.
 2 Q. And GMP had the ability to transfer electronically
 3 images of subjects of interest from control rooms to
 4 ground—assigned armed officers?
 5 A. That's correct.
 6 Q. However, having satisfied those criteria, did
 7 Inspector Nutter identify that the following areas of
 8 relevance had either not as of that date been undertaken
 9 or were still in progress at that time?
 10 A. Yes.
 11 Q. So whilst the force had a plan in place to ensure all
 12 relevant GMP officers and staff were fully briefed on
 13 their potential role under Operation Plato, this was
 14 a work in progress and had not been fully completed?
 15 A. That's correct.
 16 Q. The development of action cards within the force control
 17 room to act as an aide—memoire or aide—memoires for key
 18 staff and subsequently ensure staff had knowledge and
 19 understanding of their use was still in the development
 20 stage?
 21 A. It was.
 22 Q. And it's perhaps just worth asking you to tell us what
 23 action cards are.
 24 A. That's a process suggested for control rooms to ensure
 25 that the workload in the initial stage of a Plato

1 declaration can be appropriately and effectively
 2 distributed amongst all relevant staff in the control
 3 room. So this speaks to the discussion we had
 4 previously about the initial tactical firearms commander
 5 or the FDO potentially being overwhelmed. So the
 6 concept is that there are predefined cards that identify
 7 the various actions that need to be undertaken and they
 8 can be provided to the relevant individuals across the
 9 workforce in the control room to ensure that things can
 10 be done simultaneously and to reduce the personal impact
 11 upon the FDO.
 12 Q. It's perhaps obvious, but those who have the action
 13 cards or are to act on the basis of them have to know
 14 which action card applies in which particular scenario?
 15 A. Indeed, yes, and it was suggested that forces ensure
 16 they have arrangements to enable that and to ensure that
 17 those individuals were trained and exercised around the
 18 requirements of the specific cards.
 19 Q. In terms of other criteria that weren't satisfied in
 20 July 2017, the force Plato plan did not contain
 21 a section in respect of a requirement for the force
 22 control room to conduct a review of their Airwave
 23 communication plan at an early stage within an incident?
 24 A. At that stage, no.
 25 Q. What is an Airwave communication plan? Why is it

1 important?
 2 A. That's a plan to ensure that the Airwave communication
 3 system, in lay speak the radio network, can withstand
 4 the amount of traffic that will go across it during
 5 a significant incident. When there is a significant
 6 incident, it's important that measures are taken to
 7 ensure that that system is robust and resilient and will
 8 stand up to what is being asked of it.
 9 Q. Did Inspector Lear report that GMP did not have a copy
 10 of the nationally produced DVD intended to brief front
 11 line unarmed officers of their role during an MTFA?
 12 A. No, at that stage they didn't.
 13 Q. But he was provided with contact details to enable
 14 a copy to be supplied?
 15 A. He was.
 16 Q. Inspector Nutter also, I believe, established that the
 17 force plan was in the process of being updated to take
 18 account of the potential transfer of command to
 19 a counter—terrorism police operations room and the
 20 likely timescales?
 21 A. That's correct.
 22 Q. Whilst the force had arrangements in place for the
 23 control room to electronically track their own armed
 24 assets, they were unable to do so with units responding
 25 from other police forces or partner agencies, however

1 this was in line with the majority of other force
 2 control rooms within the UK at that time?
 3 A. That's correct.
 4 Q. And there was, I think, one other criterion that was not
 5 satisfied, which is sensitive, but I can see what it is,
 6 it's also irrelevant --
 7 A. Yes, sir.
 8 Q. -- for the issues that we're considering.
 9 Just to complete the picture in relation to the
 10 assurance visit, did Inspector Nutter provide verbal
 11 feedback and advice in respect of those matters that
 12 required attending to?
 13 A. He did.
 14 Q. And as a result, overall of the assurance visit, was it
 15 assessed by Inspector Nutter that GMP did not require
 16 any further support and that it was not necessary for
 17 CTPHQ, your unit, to maintain any ongoing engagement
 18 with GMP in relation to Operation Plato plan compliance?
 19 A. That's correct, and I reviewed that decision and
 20 supported it.
 21 MR GREANEY: We are not far from the end, and sir, while I'm
 22 told there are questions from CPs, it shouldn't take
 23 half an hour to complete those in total.
 24 SIR JOHN SAUNDERS: That's fine.
 25 Between the guidance being sent out and people

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1 attending in May in order to understand the guidance and
 2 talk to you about it and the assurance visit, the attack
 3 took place.
 4 A. It did, sir.
 5 SIR JOHN SAUNDERS: Was it always intended to have assurance
 6 visits or was that made a requirement at least as
 7 a result of what happened on 22 May?
 8 A. No, sir, it was always the intention to conduct the
 9 assessment visits and that was alluded to in the letter
 10 sent out on 23 March by Chief Constable Francis Habgood.
 11 SIR JOHN SAUNDERS: What about the date of it?
 12 A. It was intended to be conducted over the summer
 13 months --
 14 SIR JOHN SAUNDERS: So the 22 May events exchanged nothing
 15 so far as the assurance visits were concerned?
 16 A. They were always planned for the summer period but we
 17 brought them forward by a matter of weeks.
 18 MR GREANEY: Mr Thomas has almost entirely accurately
 19 recalled the position. In the letter we looked at
 20 earlier of 23 March 2017, the final paragraph reads:
 21 "Please be aware that I [this is Chief Constable
 22 Habgood] will be working with NCTPHQ to develop an
 23 assurance process in respect of forces' implementation
 24 of the refreshed guidance. I intend that this assurance
 25 process will commence in September 2017 so I would ask

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1 that you have your teams commence the review and
 2 updating of your local plans and raise awareness of the
 3 guidance amongst relevant officers and staff as a matter
 4 of urgency."
 5 A. Yes, that's correct. Sorry, I did misremember.
 6 SIR JOHN SAUNDERS: That's completely understandable.
 7 MR GREANEY: So what was anticipated was that forces should
 8 respond urgently to update plans and provide guidance to
 9 staff and that in due course there would be effectively
 10 a check to see how they were getting on?
 11 A. Yes, in a supportive manner.
 12 Q. In a supportive manner, yes, thank you very much.
 13 A. I should perhaps add there that it was made very clear
 14 that should forces require any support in the meantime
 15 between March and the intended process in September, our
 16 details were made available and we made ourselves
 17 available to forces should that be required.
 18 SIR JOHN SAUNDERS: And it was taken up or it wasn't taken
 19 up?
 20 A. No, there was contact from forces through that period
 21 in the normal course of events, seeking advice and
 22 guidance.
 23 SIR JOHN SAUNDERS: Thank you.
 24 MR GREANEY: One final topic before we deal with your own
 25 involvement on the night of the 22nd. That topic is

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1 Plato declarations by UK police forces. One of the
 2 things you were asked to do, I believe, was to provide
 3 details of all occasions when a UK police force has
 4 declared Operation Plato --
 5 A. Yes.
 6 Q. -- so that we can have a sense, more than a sense, of
 7 whether this is something which happens frequently or
 8 infrequently.
 9 A. Yes.
 10 Q. Is the first Plato declaration that you're aware of the
 11 response to the attack on Westminster Bridge on
 12 22 March 2017?
 13 A. It is, yes.
 14 Q. That was then followed by a declaration of Plato on
 15 22 May 2017?
 16 A. Yes.
 17 Q. The events we are investigating. And then the events on
 18 London Bridge on 3 June 2017?
 19 A. Yes.
 20 Q. Subsequent to that, was there a declaration of
 21 Operation Plato for an attack at the Manchester Arndale
 22 shopping centre on 11 October 2019?
 23 A. There was.
 24 Q. And the incident at Fishmongers' Hall on
 25 29 November 2019?

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1 A. That's correct.
 2 Q. Have there also been just a very small number of Plato
 3 declarations which have subsequently been very quickly
 4 rescinded when it was identified that what was occurring
 5 was not a terrorist incident?
 6 A. Yes, there have, for understandable reasons.
 7 Q. Your second statement is dated 12 March 2020. Is there
 8 any respect in which that information needs to be
 9 updated?
 10 A. No.
 11 Q. Finally, then, your operational role on 22 May 2017. On
 12 that date were you fulfilling the role of on-call
 13 national counter-terrorism armed policing adviser?
 14 A. I was.
 15 Q. Is the function of that role to provide operational
 16 coordination of the national CTSFO network?
 17 A. It is.
 18 Q. And to provide strategic advice to the SNC --
 19 A. Yes.
 20 Q. -- to both SNCs, so the Protect and Prepare SNC and the
 21 Prevent and Pursue SNC?
 22 A. As they're known now, yes.
 23 Q. As they're known since 2019, quite so. And to provide
 24 advice in respect of national capacity and capability of
 25 armed policing assets?

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1 A. Yes.
 2 Q. Is that a command or firearms tactical role?
 3 A. It isn't, no.
 4 Q. What is it?
 5 A. It's purely a coordination and strategic advice role.
 6 Q. Had you been performing that on-call role since 2013?
 7 A. I had, yes.
 8 Q. So would it be fair to say that you were highly
 9 experienced in the role and its responsibilities?
 10 A. Yes.
 11 Q. And indeed, you were unfortunate enough to be on call
 12 at the time of the Westminster Bridge terrorist attack
 13 in March 2017?
 14 A. I was, yes.
 15 Q. We heard, as you know, because you viewed his evidence,
 16 from Assistant Commissioner Basu, as he is now. In
 17 terms of the national CTSFO network, would you give us
 18 in a few sentences a description of what that is?
 19 A. The CTSFO network is a network of the country's most
 20 highly trained and best-equipped firearms officers for
 21 dealing with any type of high-risk operation, but more
 22 specifically counter-terrorism operations. To ensure
 23 the effectiveness and efficiency of that network, the
 24 operational individuals are actually embedded within the
 25 force firearms units of identified forces that are

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1 strategically located across the UK. There is a funding
 2 mechanism that means that when those resources are
 3 required to be activated as part of the
 4 counter-terrorism specialist firearms officer network,
 5 they can be so and that will take immediate effect.
 6 There's no requirement to ask the permission of the
 7 individual chief constables, those resources can be
 8 activated as part of the CT policing network immediately
 9 upon the requirement to do so.
 10 Q. So in very simple terms, the network, as we were told to
 11 describe it yesterday, is available to call upon the
 12 CTSFOs as and when required?
 13 A. Yes.
 14 Q. On 22 and 23 May 2017, were you at a two-day meeting of
 15 the national CTSFO network tactical coordinating group?
 16 A. I was, yes.
 17 Q. And you were on call?
 18 A. I was.
 19 Q. At 22.43 hours, so 12 minutes after the explosion at the
 20 arena, were you called on your mobile telephone by
 21 Inspector, now Chief Inspector, David Murtagh?
 22 A. I was.
 23 Q. Who is he and where was he, please?
 24 A. Dave Murtagh at that time was the operational lead for
 25 the CTSFO hub based in Greater Manchester Police. He

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1 forms part of that tactical coordinating group that you
 2 alluded to and so he was also present in the hotel where
 3 the meeting was taking place. However, he'd just
 4 retired to his room and so he was in a separate part of
 5 the hotel to me.
 6 Q. Did he tell you that he had just received a call from
 7 one of his CTSFO sergeants on duty in Manchester?
 8 A. He did.
 9 Q. Who had reported an explosion had just occurred at the
 10 Manchester Arena and it was believed a terrorist attack
 11 might be underway?
 12 A. He did.
 13 Q. Did the two of you agree to meet immediately in the
 14 hotel reception?
 15 A. We did.
 16 Q. And to locate yourselves in a room that you had been
 17 using for your meeting earlier that day?
 18 A. That's correct.
 19 Q. Based upon what you were told, did you then contact
 20 two -- and you describe them as on-call IRTOFs?
 21 A. That's correct.
 22 Q. What are IRTOFs?
 23 A. The IRT stands for the intervention response teams.
 24 They are the immediate response option from the CTSFO
 25 network. They are each led by an operations firearms

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1 commander, an OFC.
 2 Q. In your statement you have given some very precise
 3 times, 22.43, when you were first called, and then you
 4 called the IRTOFCs, one at 22.45 hours and the other at
 5 22.46 hours?
 6 A. I did.
 7 Q. Have you taken those times from your phone or from
 8 billing or from somewhere else?
 9 A. They were taken from my phone at or about 23.00 hours
 10 that evening when a contemporaneous log was commenced on
 11 my behalf.
 12 Q. Were you satisfied that those times were accurate times?
 13 A. I am.
 14 Q. In the calls to the IRTOFCs did you briefly explain that
 15 it was believed a terrorist attack was underway at the
 16 arena?
 17 A. Yes, very briefly.
 18 Q. And instruct them immediately to call out their IRT
 19 staff from home, gather together fully equipped at their
 20 home base, and recontact you as soon as they were ready
 21 to move from their base?
 22 A. I did, yes.
 23 Q. So within 3 minutes of you being told --
 24 A. Yes.
 25 Q. -- you'd given those instructions?

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1 A. I had, yes.
 2 Q. Whilst you had been making those calls, did you and
 3 Inspector Murtagh, were you joined in the room by
 4 Inspector Nutter about whom we've heard?
 5 A. Yes.
 6 Q. And did Inspector Nutter then open the contemporaneous
 7 log that you have told us about?
 8 A. He did, yes.
 9 Q. And at the same time was Inspector Murtagh in the
 10 process of accessing the GMP command and control system
 11 via his police issue laptop computer?
 12 A. He was, yes.
 13 Q. Yesterday Assistant Commissioner Basu told us
 14 essentially that we should rely on you for the timing of
 15 the conversation that the two of you had and so can you
 16 confirm that it was at 22.50 hours that you called
 17 Mr Basu on his mobile telephone?
 18 A. Yes, I can.
 19 Q. Did you ask him if he was aware of an incident that was
 20 taking place in Manchester?
 21 A. I did.
 22 Q. And what did he say?
 23 A. He said that he wasn't at that stage.
 24 Q. So it seems that you must have called him very shortly
 25 before his deputy and that was the way round it was?

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1 A. That's my understanding and that's how it's articulated
 2 within the contemporaneous log.
 3 Q. Right, that's very helpful, thank you.
 4 So did you update him with the information that at
 5 that stage you had?
 6 A. I did.
 7 Q. Did the information you had at that stage include that
 8 potentially gunshots had been heard?
 9 A. Yes.
 10 Q. From where had you received that information?
 11 A. From Inspector Murtagh.
 12 Q. Do you know from where he had received it?
 13 A. That would have come either from the force incident log
 14 that he was monitoring remotely via his laptop computer
 15 or it may have come from the monitoring of the Airwave
 16 radio system that was also going on within the room that
 17 we were based in.
 18 Q. So that is 22.50 hours. By that time had you been
 19 joined in the room that you were in by a small number of
 20 other CTSFO operational leads?
 21 A. Yes.
 22 Q. And were they supporting you by making calls on your
 23 behalf or assisting Inspector Nutter in maintaining the
 24 accurate log?
 25 A. Yes, because I'd made it clear that as the on-call

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1 coordinator I was taking charge of that room.
 2 Q. So in effect what had you created by that stage?
 3 A. I do describe it in the statement as a mini ops room or
 4 a mini control room.
 5 Q. At 23.05 hours did Inspector Murtagh confirm to you that
 6 GMP had declared Operation Plato?
 7 A. Yes, I believe he did.
 8 Q. By 23.11 hours, so 40 minutes precisely after the
 9 explosion, had both on-call IRTs been instructed to
 10 mobilise from their home bases and travel to
 11 a rendezvous point in Manchester?
 12 A. Yes, they had.
 13 Q. Were you aware that GMP-based CTSFOs were already being
 14 deployed as part of the immediate response under the
 15 command and control structure that GMP had established?
 16 A. Yes, it was from a CTSFO sergeant that the initial
 17 report had come to Dave Murtagh.
 18 Q. And through Inspector Murtagh did you clarify with the
 19 GMP commanders that you would not get involved in any
 20 mobilisation or deployment of GMP-based CTSFO assets?
 21 A. I did. I wanted there to be absolute clarity about who
 22 was coordinating that part of the response.
 23 Q. So the GMP command would deal with the deployment of
 24 their own CTSFOs and you would deal with the CTSFOs that
 25 were drawn to the scene from other parts of the country?

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1 A. Yes, I made it clear that affected not only the CTSFOs
 2 on duty within greater Manchester but also those that
 3 were off duty and may be recalled to duty.
 4 Q. At 23.15 hours did you speak by telephone to Assistant
 5 Commissioner Basu's deputy, Assistant Chief Constable
 6 Nicholson?
 7 A. I did.
 8 Q. And did she tell you that she had spoken to Mr Basu and
 9 was travelling to New Scotland Yard?
 10 A. She did.
 11 Q. What did you say to her?
 12 A. I updated her on the information that I had at that time
 13 and that was the situational report from the scene that
 14 had been drawn by Inspector Murtagh from his command and
 15 control system and I also updated her on the
 16 mobilisation arrangements that had been put in place,
 17 both in respect of the armed response vehicles and the
 18 CTSFO network.
 19 Q. At 23.23 hours, did Inspector Murtagh confirm to you
 20 that GMP had deployed an officer that we won't name to
 21 the GMP control room to act as the CTSFO tactical
 22 advisers to GMP commanders?
 23 A. Yes.
 24 Q. By 23.30 had you confirmed that a number that we won't
 25 name of IRTs were on their way to Manchester in addition

1 to the GMP-based CTSFOs?
 2 A. Yes.
 3 Q. Had you made other arrangements in relation to CTSFO
 4 teams?
 5 A. I had, yes.
 6 Q. What were those?
 7 A. I'd made sure that other teams were available or would
 8 be available from circa 07.00 the next morning because
 9 it was becoming clear from my experience that there
 10 would be a requirement for armed support from the CTSFO
 11 network over the coming days so it was important that we
 12 had a plan for that and that we had resources, in
 13 effect, in reserve.
 14 Q. At 00.12 did Inspector Murtagh inform the room that GMP
 15 command and control log was reporting that 17 people had
 16 died and that up to 50 were injured?
 17 A. Yes.
 18 Q. I think that had a very particular impact upon the room.
 19 A. It did.
 20 Q. At 01.32 hours did you have a particular telephone
 21 conversation?
 22 A. Sorry, can you just repeat the time?
 23 Q. 01.32.
 24 A. Yes.
 25 Q. To whom did you speak?

1 A. That was with the superintendent in charge of the
 2 National Police Coordination Centre, or NPOC, and that
 3 was in respect of the armed response vehicle support
 4 that would be provided to GMP over the coming hours and
 5 days.
 6 Q. In short, did you satisfy yourself that GMP had access
 7 to a significant number of armed response vehicles that
 8 would remain in force in the GMP force area until well
 9 into the next day?
 10 A. Yes.
 11 Q. Or into that day as it was by then.
 12 A. Yes.
 13 Q. At 02.30 hours did you have a telephone conversation
 14 with Superintendent Craig Thompson?
 15 A. I did.
 16 Q. And what role was he fulfilling at that time?
 17 A. He was the tactical firearms commander located within
 18 the CT police operations room.
 19 Q. Did he ask that you arrange for a number of CTSFO teams
 20 to be available 24 hours per day for the following
 21 3 days?
 22 A. He did, yes.
 23 Q. Did you ensure that was achieved?
 24 A. Yes, that had been pre-empted by the activities that I'd
 25 undertaken slightly earlier.

1 Q. I'm certain I'm not identifying everything that you were
 2 doing over this period, but at 04.05 hours did you speak
 3 again to Mr Basu's deputy, ACC Nicholson?
 4 A. I did.
 5 Q. What did she tell you at that stage?
 6 A. That ACC Tim Jacques had been appointed as the CT
 7 commander and would be operating from the CT police
 8 operations room. She also ratified those CTSFO
 9 resourcing plans that I'd discussed earlier in the
 10 night.
 11 Q. Did you remain within that temporary operations room
 12 at the hotel until the late afternoon of 23 May?
 13 A. I did.
 14 Q. And during that time continue to coordinate the
 15 logistics of the CTSFO network support to GMP?
 16 A. Yes.
 17 Q. And the ongoing CT investigation?
 18 A. Yes.
 19 Q. Did you also remain linked in with the national police
 20 coordination centre?
 21 A. I did.
 22 Q. So that you could ensure that you maintained an overview
 23 of armed policing national capacity?
 24 A. Yes, in line with my responsibilities as the on-call
 25 coordinator.

1 Q. And resilience?
 2 A. Yes.
 3 Q. Because no doubt you also had to bear in mind that these
 4 events were occurring in Manchester but events might
 5 also develop elsewhere?
 6 A. Yes, as the inquiry heard from Mr Basu yesterday, that's
 7 very much at the forefront of our minds during the early
 8 stages of any attack.
 9 MR GREANEY: Mr Thomas, thank you very much indeed for
 10 answering all of my questions so carefully.
 11 If everyone can bear with us, sir, what I suggest
 12 is that we carry on now. We did, after all, have a long
 13 break because of the technical problems.
 14 SIR JOHN SAUNDERS: As long as that's all right by those who
 15 are recording these events.
 16 (Pause)
 17 MR GREANEY: I will turn to Mr Horwell and ask him if he
 18 would pose his 10 to 12 minutes of questions, please.
 19 Questions from MR HORWELL
 20 MR HORWELL: Mr Thomas, I will try and get through this as
 21 quickly as I can. This is a very detailed topic and
 22 there is no time to go through all of the points of
 23 interest and I am only going to select two for the
 24 purposes of today.
 25 There are three key documents to Plato guidance.

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1 There is a very clear hierarchy and a very clear
 2 explanation as to how they all fit together. I'm
 3 obviously only interested in those documents which were
 4 in force at the time.
 5 We start with the JOPs guidance, JOP 3 as it's often
 6 described. That came into force, as we have heard, in
 7 January 2016. What in particular it signifies that
 8 document is that it is a tri-service document. Do you
 9 agree?
 10 A. Yes.
 11 Q. Sitting next to that is the exclusive police guidance,
 12 which is the CTPHQ guidance, which we have also looked
 13 at, and that is dated 23 March 2017.
 14 A. That's correct, sir, yes.
 15 Q. Then sitting next to that, and I well understand,
 16 Mr Thomas, this isn't for you to give evidence about,
 17 but just to mention it so the hierarchy of these
 18 documents is clear, sitting next to the national
 19 guidance is the NWAPC guidance for the relevant area,
 20 including Manchester.
 21 A. That's correct, sir. The national guidance is intended
 22 to inform the local plans.
 23 Q. Yes. Terminology. I have a particular interest in
 24 command structure. In terms of terminology, and we'll
 25 be coming to the sections of each of the two reports in

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1 a moment, so I'm not going to gloss over the
 2 definitions, I assure you, but simply to introduce them,
 3 in the language of JOP 3, the term used is "on-scene
 4 commander"; yes?
 5 A. That's correct.
 6 Q. In the national guidance and indeed in the regional
 7 guidance, another term is used, and that is
 8 ground-assigned TFC or GATFC; yes?
 9 A. That's correct.
 10 Q. Let's look at the definitions. This is only going to
 11 take a moment, I promise you, but I think it's important
 12 that we focus on the definitions that we have. If we
 13 could go to JOP 3, please, this is {INQ008372/5}. It's
 14 the top of that page that we need to look at.
 15 Mr Thomas, this will be very familiar to you,
 16 of course, but the definition of the on-scene commander
 17 in JOP 3 is:
 18 "An appropriate police, FRS or ambulance commander
 19 at the scene who is responsible for undertaking an
 20 ongoing joint assessment of risk and for decision-making
 21 on the deployment of their organisation's assets at that
 22 location. On-scene commanders will therefore ensure the
 23 emergency services' response is effectively coordinated
 24 at scene."
 25 That is the only definition we have, Mr Thomas,

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1 isn't it?
 2 A. In JOPs edition 3, sir, yes, it is.
 3 Q. I'm now going to look at the NCTPHQ document and that is
 4 {INQ016688/16}. It's the bottom section of that page,
 5 7.2.
 6 A. I don't have that on the screen in front of me.
 7 SIR JOHN SAUNDERS: They're on the big boards but they're
 8 not on the individual screens. Now they are.
 9 Thank you.
 10 MR HORWELL: Again, Mr Thomas, very familiar to you. 7.2:
 11 "In particular, forces should review their
 12 Operation Plato plans in relation to their ability to
 13 deploy a TFC to undertake the role of on-scene
 14 commander."
 15 So that's JOP language, yes?
 16 A. That's correct, yes.
 17 Q. "Or ground-assigned TFC in a timely manner.
 18 A ground-assigned tactical command function is essential
 19 in order to develop command situational awareness, the
 20 overall ability to resolve the incident, and to meet the
 21 requirements of the multi-agency approach to an
 22 Operation Plato incident."
 23 We can take that off the screen, thank you.
 24 So Mr Thomas, it's clear, I would suggest, that the
 25 terms "police on-scene commander" and "ground-assigned

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1 TFC" are interchangeable; do you agree?
 2 A. Yes, the on-scene commander language is appropriate for
 3 all three agencies, so that's why it's the terminology
 4 that is utilised within JOPs edition 3. When we then
 5 come to the specific police single-service guidance that
 6 underpins that, we recognise that in police language
 7 that on-scene commander may be referred to as
 8 a ground-assigned TFC, but they will be discharging the
 9 responsibilities of the on-scene commander as per JOPs
 10 edition 3.
 11 Q. I hope I can accurately summarise the position in this
 12 way: two different titles but the same role?
 13 A. Yes, to reflect the nature -- the differing nature of
 14 the two documents.
 15 Q. Mr Thomas, can we agree on this, that there can only be
 16 one police on-scene commander; do you agree?
 17 A. Responsible for that activity on the scene in
 18 conjunction with the two other emergency service
 19 partners, yes, sir.
 20 Q. I'm going to refer very briefly possibly to events in
 21 Manchester and possibly to events at other terrorist
 22 attacks, but, Mr Thomas, I can assure you I'm going to
 23 keep to the regulations, the rules, that have been set
 24 out. I'm not going to ask you to comment in any way.
 25 I'm not seeking your opinion on other incidents, it's

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1 the principle that I am concerned with.
 2 On the night of this attack, and no doubt for all
 3 similar attacks, the scene can be divided into the inner
 4 scene and the outer scene; do you agree?
 5 A. I do agree, yes.
 6 Q. The inner scene, dealing with an explosion, would
 7 include the site of the explosion, the casualty
 8 collection point, the casualty clearing station, the
 9 ambulance loading point and the FCP; would that be fair?
 10 A. I would expect the specific decisions around that to be
 11 taken at the time based on the prevailing circumstances,
 12 and our authorised professional practice for armed
 13 policing, as I referred to earlier, where it speaks to
 14 command structures, recognises that fact, that whilst
 15 there is a structure there, it's imperative that
 16 commanders make decisions about the specifics of that
 17 command structure according to the events they are
 18 attempting to deal with that are unfolding in front of
 19 them.
 20 Q. Obviously, circumstances will differ, but if that is
 21 a fair summary of what you might expect in the inner
 22 scene then obviously the outer scene will comprise in
 23 the main, but not exclusively, the setting of cordons,
 24 for example?
 25 A. That would be one example of a role that I would see

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1 sitting outside of the responsibility of the on-scene
 2 commander or ground-assigned TFC, but there may be
 3 others. As I say, it would very much depend on the
 4 prevailing circumstances at the time and the ability and
 5 capacity of the commanders to manage what's taking
 6 place.
 7 Q. My next question is this: in respect of the inner scene,
 8 the police on scene commander will be in command of all
 9 police assets, armed and unarmed police officers; do you
 10 agree?
 11 A. All of those engaged in activity within their span of
 12 command, yes, that's correct, sir.
 13 Q. And that would include unarmed and armed police
 14 officers?
 15 A. It may well do, depending on which assets are being
 16 deployed to undertake which activity. If it helps, the
 17 way that I always explain this is that the on-scene
 18 commander is responsible for all of that forward-facing
 19 threat mitigation and life-saving activity. That's
 20 where their focus in my opinion should be focused and
 21 there should be a supporting infrastructure around them
 22 that enables them to do that.
 23 Q. That's very helpful, Mr Thomas, thank you.
 24 My next topic, and a much shorter one, is Plato and
 25 the questions that you have been asked about keeping

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1 Plato under review. You will know perfectly well that
 2 information that is available in an emergency such as
 3 Manchester, but also other terrorist attacks, is going
 4 to be at times very confusing.
 5 A. By the very nature of it, yes, sir.
 6 Q. We will all remember Mr Basu's evidence from yesterday
 7 that there is a good deal of incorrect information on
 8 social media, as an example, which has to be taken at
 9 face value because, as Mr Basu said, you can't afford to
 10 make the mistake of thinking that it is false or
 11 incorrect; do you agree?
 12 A. I do agree with that, sir, yes.
 13 Q. Are you aware of the principal factual details of the
 14 London Bridge attack, for example?
 15 A. I am, yes, in broad terms, sir.
 16 Q. I'm just using this as an example and I'm not, as I said
 17 at the outset, asking you to make any comment or to give
 18 any opinion as such, but in London Bridge there were
 19 three terrorists, and the ARV officers that arrived at
 20 Borough Market shot them within literally seconds of
 21 their arrival at the scene.
 22 A. That's correct, sir, yes.
 23 Q. So the three terrorists, there were only three
 24 terrorists in London Bridge, were shot within moments of
 25 armed police officers arriving at that part of the

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1 scene, as you have agreed.
 2 A. They were, yes. That's correct, yes.
 3 Q. But even though the three terrorists had been shot and
 4 therefore, of course, incapacitated, there followed
 5 a series of reports of further attacks and further
 6 explosions that had to be considered?
 7 A. They did, in line with all the experience we have around
 8 that type of attack. That's correct.
 9 Q. And coming to the evidence of this attack in Manchester,
 10 we will be coming to these details at length later,
 11 Mr Thomas, but for example a report of an attack and
 12 a siege at a hospital, events that simply didn't take
 13 place. Those reports came in and had to be considered
 14 and dealt with?
 15 A. I would agree with that, sir, yes.
 16 Q. And as you said almost at the end of your evidence when
 17 questioned by Mr Greaney, very much at the forefront of
 18 your mind in an attack of this nature has to be the
 19 question: are there going to be secondary follow-up
 20 attacks?
 21 A. Correct, yes.
 22 Q. So my question, Mr Thomas, is this: deciding if and when
 23 to rescind Plato is a much easier decision to make after
 24 the event with the benefit of hindsight than it is to
 25 make during the event?

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1 A. As with any critical decision-making, sir, yes.
 2 MR HORWELL: Mr Thomas, thank you very much. That's all
 3 I ask.
 4 SIR JOHN SAUNDERS: I'm not sure we entirely agree on what
 5 is opinion evidence and factual evidence, but that was
 6 all fine, thank you.
 7 MR GREANEY: Sir, we'll next ask Mr Atkinson to pose his
 8 questions.
 9 SIR JOHN SAUNDERS: Can I just ask Mr Horwell to come back?
 10 There's something arising out of his question I ought to
 11 ask.
 12 MR HORWELL: I'm here.
 13 SIR JOHN SAUNDERS: Thank you. Because we may hear other
 14 evidence about this at a later stage, the question of
 15 which police officer takes control at the scene and of
 16 what assets. If you have a situation when there are
 17 a very large number of firearms officers on the scene
 18 and you have a very large number of non-firearms
 19 officers, I hesitate to call them ordinary police
 20 officers, but non-firearms, does it actually work to
 21 have the same person in charge of both groups of people
 22 as a matter of practice?
 23 A. The command structure should be such that it can flex
 24 according to the nature and scale of the operation and
 25 it is normal practice that in very large operations the

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1 command structure will be reviewed and it may well be
 2 that additional commanders are appointed, even according
 3 to geographical areas, I'll not use the term zones for
 4 the fear of conflating two issues, but for geographical
 5 areas or for function, and again how that division is
 6 determined will be on the basis of the prevailing
 7 circumstances at the time.
 8 It may well be that a decision is taken to appoint
 9 one person to be responsible for the firearms officers
 10 and somebody else to be responsible for the unarmed
 11 officers in certain situations, or it may well be that
 12 one person is appointed to take command of both of those
 13 officers within one area of operations and somebody else
 14 for both of those groups of officers within other
 15 geographical areas of responsibility. But that should
 16 be determined on the given events prevailing at the
 17 time.
 18 SIR JOHN SAUNDERS: Who makes that decision, ie we need two
 19 commanders for unarmed and armed or it could be done by
 20 the one?
 21 A. The strategic commander is responsible for ensuring that
 22 the command structure is appropriate and resilient.
 23 SIR JOHN SAUNDERS: Is that Silver or Gold or is it
 24 a tactical firearms officer?
 25 A. The strategic commander is either the strategic firearms

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1 commander or the Gold, depending on the nature of the
 2 operation and the terminology that's being used.
 3 SIR JOHN SAUNDERS: Is it necessary to make clear to the
 4 ground commander whether in his function on this
 5 particular occasion he is commanding both or only one or
 6 would it be assumed he did both unless someone told him
 7 to the contrary?
 8 A. No, there would be no assumption. There should be
 9 absolute clarity within that command structure and
 10 amongst the officers deployed under that command
 11 structure as to which commanders own what and when and
 12 who is reporting to who. There is an absolute need for
 13 clarity in that regard.
 14 SIR JOHN SAUNDERS: Mr Horwell, you will understand why
 15 I have asked those questions, because it may become
 16 an issue in due course. If you want to go back to it
 17 now, by all means do. A matter for you entirely.
 18 MR HORWELL: No, sir, that's very helpful. Thank you for
 19 the opportunity but I have no further questions to ask.
 20 Thank you.
 21 SIR JOHN SAUNDERS: Thank you very much.
 22 Mr Atkinson.
 23 MR ATKINSON: Sir, I hope you can hear me.
 24 SIR JOHN SAUNDERS: Yes.
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1 Questions from MR ATKINSON
 2 MR ATKINSON: Very good.
 3 Mr Thomas, I'm going to see if we can do this
 4 without going back to the documents, but if at any point
 5 it would help you to see the document, please say so;
 6 all right?
 7 A. Yes, sir .
 8 Q. Can we agree that in terms of what did or did not change
 9 between the 2012 and the 2017 iterations of the
 10 Operation Plato guidance that what did not change was
 11 a recognition of the importance of multi-agency working
 12 in an Operation Plato context?
 13 A. No, sir . That was the golden thread throughout.
 14 Q. And so the knowledge that other agencies needed to know
 15 that it was an Operation Plato situation was very clear
 16 throughout?
 17 A. In my view, sir , yes.
 18 Q. Because it was said very clearly and repeatedly in the
 19 2012 version as much as it was in the 2017?
 20 A. I believe so, yes.
 21 Q. Because you told us that one of the reasons that the new
 22 2017 version was brought in was to improve
 23 interoperability . That wasn't because it was not
 24 already recognised that there had to be a joined-up
 25 approach between the responders?

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1 A. No, we were simply trying to enhance the guidance in
 2 2017 in respect of the guidance that existed prior to
 3 that. So it may well be in places that we additionally
 4 emphasised that point, but I agree with you that it
 5 was -- the term I have used, it was the golden thread
 6 throughout the 2012 and 2017 guidance.
 7 Q. You were asked a little earlier , I think by the chair,
 8 some questions about situations where it might be
 9 appropriate for the police control room inspector who
 10 had declared Operation Plato not to tell others. I'm
 11 not going to go into that in any detail with you because
 12 that is for others in due course. But clearly, what the
 13 guidance intended was that the other agencies be told so
 14 that joined-up decisions could then be made as to who
 15 should go where and do what.
 16 A. That's exactly right, sir .
 17 Q. And if there were concerns on the one hand about putting
 18 responders at risk and, on the other hand, saving lives ,
 19 those were things to be worked out jointly through
 20 three-way communication of the emergency services?
 21 A. Exactly, sir .
 22 Q. In terms of what may not have changed but was intended
 23 to change, as I understand your evidence, it had been
 24 recognised that the role of the control room inspector,
 25 or the FDO in GMP parlance, that that role could very

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1 easily become overwhelmed very quickly in an
 2 Operation Plato situation.
 3 A. That's correct, sir , I believe that had been recognised
 4 right from the inception in 2012.
 5 Q. But do we understand from what you've said that that was
 6 not what led to the 2017 change in the policy?
 7 A. Sorry, you just need to expand what you mean in terms of
 8 the change to the policy.
 9 Q. You told us that what led to the 2017 revision to the
 10 2012 Operation Plato guidance was the need to achieve
 11 consistency between the forces and to enhance
 12 interoperability .
 13 A. That wasn't the only driver. As I said earlier , the
 14 driver for the refreshed guidance was to ensure that it
 15 was more fulsome and provided the most up-to-date and
 16 detailed guidance possible at that time, hence why it
 17 almost -- well, it did more than double in size as
 18 a document.
 19 Q. But do we understand that the recognition from the very
 20 beginning that the FDO role, in GMP parlance, was very
 21 easily going to be overwhelmed had not led to the
 22 guidance being changed any earlier than 2017?
 23 A. I think I'm correct in saying that the 2012 guidance
 24 recognises the fact that the FDO -- it won't use that
 25 terminology, I think it will use the terminology of the

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1 force control room inspector -- will be required to
 2 undertake or be responsible for a significant amount of
 3 activity . However, in the 2017 guidance, when we
 4 refreshed it, we were trying to ensure that that was
 5 very much emphasised and the available mitigating steps
 6 were also outlined within that refreshed guidance, if
 7 that makes sense and helps.
 8 Q. In terms of mitigating steps, was a key one of those the
 9 introduction or the recommended introduction of action
 10 cards for the control room at the time Operation Plato
 11 was declared?
 12 A. Yes, that's correct . That sharing of the load and the
 13 responsibility across the entire team in the force
 14 control room.
 15 Q. Because what that would mean is that the inspector could
 16 share the responsibility for telling a whole raft of
 17 people who needed to know that Plato had been declared
 18 that it had happened?
 19 A. That's correct, sir . That's very much the case.
 20 Q. Because the 2017 version of the guidance still in its
 21 list of immediate actions expected the FDO, or in the
 22 terminology of the guidance the ITFC, the initial
 23 tactical firearms commander, who would be the same
 24 person in the first instance, to tell the other
 25 emergency services, to tell you in your role, and to

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1 tell the SNC and others that Plato had been declared.
 2 A. To ensure that that was done, yes.
 3 Q. And the action cards would allow for others in the
 4 control room to do it rather than for it to be the FDO
 5 on the phone himself or herself to a whole series of
 6 people?
 7 A. That is the purpose of the concept of the action cards,
 8 to share the relevant responsibilities as appropriate
 9 amongst the relevant members of the team in the force
 10 control room.
 11 Q. And as you told us not very long ago, the introduction
 12 of the action cards was one of the things picked up in
 13 July of 2017 as still on the to-do list so far as GMP
 14 were concerned?
 15 A. That's correct, sir, yes.
 16 Q. In terms of the operation on 22 May, just one point to
 17 clarify so far as your role is concerned. I think it's
 18 right that it was not the FDO who informed you of the
 19 Operation Plato situation?
 20 A. No, that's correct, I was informed by Inspector
 21 Dave Murtagh, who in turn had been informed by one of
 22 the operational CTSFO sergeants that was being deployed
 23 to the scene. So in a way that information was
 24 fast-tracked, that's the way that I would describe it,
 25 through what you could possibly, and I think yesterday

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1 was referred to as informal channels — I'm not sure
 2 that I would describe it that way. But it was certainly
 3 fast-tracked, which was very beneficial from my
 4 perspective, certainly.
 5 If I could just clarify one point as well, sir,
 6 please. In respect of the assurance visit that was
 7 undertaken to GMP, what Inspector Nutter recorded was
 8 that activity was in progress. I think you used the
 9 term that it was on the to-do list. The note records
 10 that it was in progress, I believe.
 11 Q. As indeed was the rolling out of information to all
 12 those who needed to know as to what their roles would be
 13 in a Plato situation?
 14 A. That's correct, sir, yes.
 15 MR ATKINSON: Thank you. That's all I need to ask you.
 16 Thank you, sir.
 17 SIR JOHN SAUNDERS: Thank you, Mr Atkinson.
 18 MR GREANEY: Finally, Mr Weatherby.
 19 Questions from MR WEATHERBY
 20 MR WEATHERBY: I'll be very brief indeed.
 21 Mr Thomas, can I just deal with two points from the
 22 2017 guidance, please. The first one, I don't think
 23 it's necessary to turn up. Am I right that part of the
 24 guidance emphasised the importance of an audit trail?
 25 That term is actually used in the guidance in respect of

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1 key decisions and rationales being taken on an
 2 Operation Plato incident.
 3 A. Yes, sir, that's correct.
 4 Q. As I say, just for people's note, I'm referring to
 5 paragraphs 5.9 to 5.14.
 6 The guidance discusses different ways that can be
 7 achieved, including body-worn audio equipment and
 8 dictaphones, amongst other —
 9 A. That's correct, yes.
 10 Q. So it goes into some detail and it indicates, 5.14, that
 11 the activation of whatever audio device is involved
 12 should occur as early as possible during a developing
 13 incident to capture key early decision-making and
 14 associated rationale leading up to and including the
 15 point at which an Operation Plato is declared; is that
 16 right?
 17 A. That's correct, and the insertion of that into this
 18 document simply amplifies the existing guidance in the
 19 broader armed policing authorised professional practice
 20 that I've referred to a number of times today.
 21 Q. And that's the importance of an audit trail and the best
 22 way of achieving an audit trail with recording by an
 23 audio device is something that has been developed in
 24 other areas of firearms, police firearms activity as
 25 well, in recent years; is that right?

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1 A. That's correct, sir, yes.
 2 Q. Okay, thank you very much. The second point. We should
 3 have this up on the screen, please. The document is the
 4 same document, {INQ016688/22}.
 5 Paragraphs 11.3, 11.4, 11.5, 11.6. It's a point
 6 that Mr Greaney's already gone to, but it's very
 7 important that we all understand it, I think.
 8 (Pause)
 9 11.3. As we have fully understood, the FIM or the
 10 FDO in GMP—speak identifies and declares Plato.
 11 11.3:
 12 "... identifies and declares Plato and is then
 13 responsible for notifying the ambulance and fire and
 14 rescue service control rooms as soon as possible."
 15 That's the wording.
 16 A. That's correct, yes.
 17 Q. As we've been through it in some detail, that activates
 18 their knowledge, so they can take their own command
 19 decisions but also the activation of their contingency
 20 plans.
 21 A. That's correct, yes.
 22 Q. 11.4:
 23 "Following from the notification to the other
 24 control rooms, the FDO is then responsible for
 25 instigating a three-way link between those control

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1 rooms"; yes?
 2 A. That's correct, yes.
 3 Q. That could be simply by a conference telephone call?
 4 A. It could be by conference call or it could be through
 5 using an interop channel within the Talk Group -- sorry,
 6 within the Airwave network.
 7 Q. So there are various ways of achieving that.
 8 A. Yes.
 9 Q. 11.5, that link is then left open, so there's an online
 10 or on--telephone open link between the three emergency
 11 services until there's a tactical coordinating group or
 12 until the emergency services tactical commanders are
 13 co--located; is that right?
 14 A. That's correct, sir, yes.
 15 Q. Then the point that Mr Greaney has already taken us to,
 16 that some of the key reasons for that policy are so that
 17 there can be joint decision--making between the three
 18 services; yes?
 19 A. That's correct, sir.
 20 Q. And by no means the only decisions, but three important
 21 decisions are the identification of an RVP, or,
 22 I suppose, possibly RVPs plural.
 23 A. Yes.
 24 Q. The identification of a forward command post?
 25 A. Yes.

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1 Q. So the on--scene commanders that Mr Horwell was asking
 2 you about, so there's a position identified where they
 3 can meet as soon as possible.
 4 And thirdly, there's joint dynamic decision--making
 5 relating to the hot, cold and warm zones?
 6 A. That's correct, yes.
 7 Q. So the policy identifies that it's crucial that all of
 8 the responders are involved in those key decisions, in
 9 particular the zoning.
 10 A. It does, sir, yes.
 11 Q. And one of the key reasons for that is, of course, there
 12 needs to be consideration of safeguarding not only the
 13 public but also the responders.
 14 A. That's correct, yes.
 15 Q. That's all I need from that document, thank you very
 16 much.
 17 Just finally in respect of the timing of a Plato
 18 declaration, the whole point of having policies around
 19 Plato is because of this threat that emerged from,
 20 certainly by 2008, of terrorists marauding with the
 21 intent to kill as many people as possible; yes?
 22 A. That's correct, yes.
 23 Q. So the whole underlying purpose of the policy is that
 24 the urgent threat, the imminent threat has to be dealt
 25 with absolutely immediately, as soon as conceivably

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1 possible; is that right?
 2 A. The threat from the attackers needs to be neutralised as
 3 quickly as possible on the basis that if we don't
 4 achieve that, they will continue killing people.
 5 Q. Yes. Therefore in terms of the declaration of Plato,
 6 it is better to declare if in doubt and to stand down if
 7 it turns out not to be appropriate than it is to wait
 8 until you're sure it is an MTFA before declaring?
 9 A. In my view, sir, yes.
 10 MR WEATHERBY: Thank you very much. That's all I ask.
 11 SIR JOHN SAUNDERS: I just want to clarify one thing,
 12 Mr Weatherby, so stay on the line just for one moment.
 13 The three--way radio, when you decide things, one of
 14 the things is an RVP. An RVP is really required pretty
 15 quickly?
 16 A. Yes.
 17 SIR JOHN SAUNDERS: Because you're going to set the
 18 resources off to go to that RVP.
 19 A. Some of the resources may well be directed direct to the
 20 scene, but yes, an RVP is a critical thing that needs to
 21 be achieved very quickly.
 22 SIR JOHN SAUNDERS: And you expect everyone to agree it;
 23 is that how it works?
 24 A. Yes, in an event such as this, the police are the lead
 25 agency, so I would expect the police to propose an RVP

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1 and if any of the service colleagues identified an issue
 2 with that to share it and, if there needed to be, have
 3 a discussion, but in my experience, fairly extensive
 4 experience, that won't happen very often. An RVP will
 5 be identified by the lead agency and the other agencies
 6 will be comfortable with it and so they will remain with
 7 that RVP.
 8 SIR JOHN SAUNDERS: Not here, I'm afraid, on this occasion.
 9 Okay, thank you.
 10 Mr Weatherby, have you anything to follow up from
 11 that?
 12 MR WEATHERBY: No. Thank you very much.
 13 SIR JOHN SAUNDERS: Thank you.
 14 MR GREANEY: Sir, I know that Mr Butt does not have any
 15 questions. But equally, I know that Mr Thomas, an
 16 officer who did what he could in the aftermath of the
 17 attack, does have something that he wishes to say.
 18 A. Thank you. Just on behalf of myself and all of my
 19 colleagues within the entire CT policing network and
 20 indeed, I am sure, across the whole police service,
 21 I wanted to express my sincere condolences to all of the
 22 victims' families and all of the survivors and everybody
 23 else that was impacted by this horrendous event. As
 24 a network, I think as AC Basu alluded to yesterday, we
 25 go to work every single day to try and prevent this kind

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1 of thing happening. I just wanted to record my own
 2 personal views and also on behalf of my colleagues on
 3 that point.
 4 SIR JOHN SAUNDERS: Thank you.
 5 MR GREANEY: Sir, that brings the proceedings for today and
 6 for this week to a close.
 7 SIR JOHN SAUNDERS: Right. I will adjourn then until Monday
 8 morning at 10 o'clock. The work will of course carry
 9 on, but not taking place in public hearings.
 10 MR GREANEY: Indeed, sir, thank you very much.
 11 Thank you all very much.
 12 (1.40 pm)
 13 (The inquiry adjourned until 10.00 am on
 14 Monday, 8 February 2021)
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