

OPUS2

Manchester Arena Inquiry

Day 65

February 22, 2021

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1 Monday, 22 February 2021
 2 (10.00 am)
 3 MR JOHN FLETCHER (continued)
 4 MS CARTWRIGHT: Good morning, sir. The gentleman in the
 5 witness box, as you'll recall, is Mr Fletcher, whose
 6 evidence went part heard on 10 February.
 7 SIR JOHN SAUNDERS: Can I say it's nice to see some of the
 8 family CPs have been able to join us today. We
 9 obviously hope that will progress depending on how
 10 things develop, but it's good to see you back again.
 11 MS CARTWRIGHT: Having said that, could we start with
 12 Mr Cooper's questions of Mr Fletcher, please?
 13 Questions from MR COOPER
 14 MR COOPER: Good morning, sir, and good morning,
 15 Mr Fletcher.
 16 As you know, I ask questions on behalf of the
 17 families in this matter. Others may have other
 18 questions, but we ask the questions on this issue and
 19 also I note that you're returning, aren't you, in due
 20 course to give evidence at a later stage and there may
 21 be other matters which we need to ask you about and CTI
 22 are aware of that.
 23 A. I am, sir, yes.
 24 Q. Just to bring matters together from when you were last
 25 giving evidence, you were, at the time of this atrocity,

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1 the contingency planning manager, weren't you? You had
 2 been that since 2013?
 3 A. Yes, sir.
 4 Q. A general question, if I may first. At the time of this
 5 atrocity, was responding to incidents of marauding
 6 terrorism considered to be a role for a firefighter?
 7 Was it considered to be a role or a key role at the time
 8 of this atrocity?
 9 A. Responding to the MTFA was considered a role. Obviously
 10 we had the specialist teams who were trained. We had
 11 discussed about the zones and working in the warm zone
 12 and it was those specially trained personnel that'd work
 13 in the warm zone area.
 14 Q. As far as attitudes towards responding to marauding
 15 terrorism incidents, it was well-established, was it,
 16 and uncontroversial that the Fire Service would play
 17 an important role in that?
 18 A. Yes, sir, it was.
 19 Q. I want to ask you on a number of occasions, please, to
 20 look at your statement. That's the only document
 21 I anticipate referring you to during the course of my
 22 questions, so it will be useful to have that in front of
 23 you. That's {INQ026734/1}.
 24 I would like to take you, to begin with, please, to
 25 paragraph 42 of that statement. I just want to ask you

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1 a few questions about the background to the MTFA
 2 approach in particular so far as Manchester is
 3 concerned.
 4 As you say in paragraph 42:
 5 "MTFA is now a national resilience asset and is
 6 hosted by a number of fire and rescue services
 7 throughout the country. If necessary additional
 8 national assets can be requested by the Fire and Rescue
 9 Service."
 10 It seems from reading your statement, Mr Fletcher,
 11 that Merseyside play a key role in the facilitation of
 12 assets in relation to Manchester; is that right?
 13 A. Yes. Merseyside themselves have an MTFA capability, but
 14 the mobilisation of mutual aid assets under the NCAF,
 15 which is the National Coordination Advisory Framework
 16 for National Resilience Assets, any requests for mutual
 17 aid will be coordinated through Merseyside Fire Control,
 18 who were the national coordination centre at that time.
 19 Q. Just to be clear, what do you mean by those assets,
 20 multiple assets? What do you mean by that?
 21 A. The national resilience was a wider element of
 22 resources. Following 9/11, the New Dimensions Project,
 23 we brought into place mass decontamination assets to
 24 support the Ambulance Service, high-volume pumps for use
 25 in flooding, (inaudible: distorted) detection,

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1 identification and monitoring capability, urban search
 2 and rescue. It was those key elements that formed the
 3 national resilience and Merseyside Fire Control would
 4 mobilise those on request.
 5 Q. I understand. So far as Manchester Arena was concerned
 6 on the night of 22 May 2017, none of those assets were
 7 really considered to be required? That's not
 8 a criticism, that's just clarifying. Is that right?
 9 A. No. I actually put — asked North West Fire Control to
 10 contact Merseyside to put their MTFA assets on standby
 11 because at the same time obviously we were still under
 12 the impression that it was a marauding terrorist attack.
 13 So Merseyside's MTFA capability was on standby on the
 14 night.
 15 Q. Was Merseyside, if I can just shorthand it, required to
 16 provide any assistance?
 17 A. We didn't mobilise them forward due to the fact that we
 18 hadn't sent our MTFA capability into the scene. If we'd
 19 have mobilised our capability Merseyside would have been
 20 straightaway mobilised to the rendezvous point and what
 21 we would have done from there is asked another FRS that
 22 has another MTFA capability, one, to go on standby and,
 23 obviously due to the geography, possibly mobilise to the
 24 RVP if the incident was ongoing.
 25 Q. So it was really a domino effect, was it? Because the

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1 MTFA capability wasn't mobilised as far as here in
 2 Manchester is concerned, Merseyside were not involved
 3 either?
 4 A. No, they weren't mobilised. They were assembled, they
 5 were ready to go. I was in contact with their NILO on
 6 the night but we didn't mobilise them forward to the
 7 RVP, no.
 8 SIR JOHN SAUNDERS: Mr Cooper, I said I was not going to
 9 interrupt too much this week, but I'm going to start off
 10 badly, I'm afraid.
 11 One of the possible reasons that we may hear in the
 12 future — and I say only possible — for not mobilising
 13 the Manchester MTFA was that they might be required for
 14 another incident if it were to occur. On what you have
 15 said, actually, if the Manchester MTFA vehicles went to
 16 the arena then the Merseyside would be brought up to the
 17 forward position and could be available for any other
 18 thing in Manchester; is that right?
 19 A. That's correct, sir, yes.
 20 SIR JOHN SAUNDERS: How long would it take to get the
 21 vehicles from Merseyside to somewhere in Manchester?
 22 A. Obviously at that time of day, where they were located,
 23 probably about 20/25 minutes on blue lights. The
 24 biggest time would be to assemble them. That's why we
 25 put them — gave them notice to assemble them and then

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1 if the situation changed we'd mobilise them
 2 straightaway.
 3 SIR JOHN SAUNDERS: Thank you. Thank you, Mr Cooper.
 4 MR COOPER: Thank you, sir.
 5 So in many respects up until — well, for
 6 significant periods of time we've been discussing,
 7 perhaps the loss of the ability of colleagues in
 8 Manchester to assist at the arena for reasons we're
 9 examining, your colleagues in Merseyside were equally
 10 hamstrung; would that be right?
 11 A. I wouldn't say they were hamstrung. We hadn't mobilised
 12 them to the incident. They would come on our request.
 13 Due to the search situation that we encountered on the
 14 night our own MTFA capability hadn't been mobilised into
 15 the scene at that time for whatever reason. So they
 16 weren't hamstrung: we would have made that request
 17 immediately that the MTFA — the Greater Manchester MTFA
 18 had been mobilised to the incident.
 19 Q. But because you weren't mobilised to the incident, we
 20 couldn't get as far as asking for the assistance of
 21 Merseyside, could we?
 22 A. We could have asked for them but because of the way the
 23 incident was progressing and the MTFA hadn't been
 24 mobilised, we didn't mobilise Merseyside, so it was, as
 25 you said before, a domino effect. If our MTFA had been

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1 deployed, we would automatically have requested
 2 Merseyside's to move forward to Manchester to
 3 a rendezvous point.
 4 Q. Merseyside could have had a significant contribution,
 5 could they not, to assist the injured and, sadly, the
 6 dying?
 7 A. Yes, sir. They would have had the same level of MTFA
 8 training, the numbers of operatives, as Manchester would
 9 have been able to deploy, yes.
 10 Q. Can I ask you just a little, please, about your
 11 paragraph 43 when you deal with funding. You say:
 12 "The MTFA is funded by the Home Office and it is an
 13 approximate ongoing annual cost of £27,000 per year
 14 broken down into capital and revenue funding."
 15 A. Yes.
 16 Q. I'm going to put you on the spot here, Mr Fletcher, I am
 17 sorry, to ask you whether you think that funding
 18 provides enough to enable MTFA to perform their
 19 important role.
 20 A. It's a good question. We do use the — when I was
 21 in the service, we did use the £27,000 per year, but we
 22 utilised some of that for replacement of first aid
 23 equipment if we'd used it on — certainly if the use—by
 24 date had expired. We used some of it for making more of
 25 a permanent location for the vehicle. So it was ongoing

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1 costs. I think the £27,000 to maintain the capability
 2 was probably sufficient, but we did use the vast
 3 majority of that money, yes.
 4 Q. Can I suggest to you, Mr Fletcher, for the important
 5 facility provided by MTFA, £27,000 a year nationally
 6 sounds quite a paltry figure. What do you say about
 7 that?
 8 A. Sorry, just to clarify, that's not a national figure,
 9 £27,000, that's the £27,000 per MTFA capability.
 10 We would have that £27,000, Merseyside would have that
 11 £27,000, and the other capabilities in the country would
 12 have the same figure.
 13 Q. Still so, I put the same essence of the question.
 14 Greater Manchester is a significant spread, as it were.
 15 £27,000 per annum seems quite a paltry figure. What
 16 do you say about that for someone being on the front
 17 line?
 18 A. We would obviously like to have more money. It
 19 contributed to training. Some of the heavy items, the
 20 ballistic protection kit, which are really expensive,
 21 they would be resupplied through national procurement.
 22 That wouldn't come out of that money.
 23 SIR JOHN SAUNDERS: We know none of the MTFAs went to the
 24 scene on this particular night. If they had, would they
 25 have been hampered by not having things that they ought

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1 to have had because of a lack of money?
 2 A. The honest answer, sir, I don't think they would have
 3 done, no. We had a decent capability available on the
 4 night.
 5 MR COOPER: I will move on.
 6 Is there any difference between MTFA practice
 7 locally or nationally? The question really zeroes in
 8 on: is there consistency in MTFA practice or is there
 9 a local approach to it?
 10 A. We had the national concept of operations and then it
 11 was up to local areas to develop their own training
 12 programmes. I think nationally there was that
 13 expectation that they would at least do some form of
 14 training, at least once a year to maintain their skills
 15 under CPD. But each individual fire and rescue service
 16 would sort of do a bespoke training programme for their
 17 own assets.
 18 Q. Do you think perhaps there should be more national
 19 oversight particularly, as you put it, on training. You
 20 said a moment ago there was an expectation nationally
 21 that training would be properly administered. Do you
 22 think perhaps there should be more of a national
 23 oversight as to training and quality of provision by
 24 MTFA?
 25 A. I think that's a fair comment, sir, yes.

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1 Q. Would you agree with the general proposition then that
 2 if communications fail, MTFA fails?
 3 A. Well, as happened on the night, there was basically
 4 a catastrophic failure in communication and it did fail
 5 to deploy the assets, so I'd have to say yes on that.
 6 Q. It's a general proposition I'm putting to you, not
 7 simply just on the night, but as a general proposition.
 8 If communications fail, MTFA will fail?
 9 A. Yes.
 10 Q. Thank you.
 11 I want to take you to paragraph 48, please, dealing
 12 with matters which are going to be of particular
 13 importance to those we represent. Can I highlight here,
 14 sir, there may be just a few sensitive matters I'm going
 15 to deal with, not as far as particular bereaved are
 16 concerned, and we've certainly spoken to our clients
 17 about it, but I mention for all bereaved. I'm going to
 18 touch a little on the provision of medical equipment, so
 19 this may be a little distressing for those listening.
 20 I raise it now, sir.
 21 SIR JOHN SAUNDERS: Thank you.
 22 MR COOPER: If we look at paragraph 48, part of the MTFA
 23 capability involves enhanced medical training; that's
 24 correct, isn't it?
 25 A. It is, yes.

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1 Q. And you say "with input from NWS". What sort of input
 2 does NWS have there?
 3 A. NWS would deliver — I think on the initial course for
 4 new operatives they would get a day's training with NWS
 5 and yearly, again as part of continuous professional
 6 development, they would receive another day's training
 7 just to maintain their skills.
 8 Q. There are a number of provisions provided, as you
 9 indicate in your paragraph 48: specialist bandages, for
 10 instance, to treat blast and gunshot wounds and
 11 Prometheus dressings, you refer to them as, and other
 12 such training. They would have been particularly
 13 important, would they not, in circumstances, tragically,
 14 that some people found themselves in post—detonation?
 15 A. Yes, they would.
 16 Q. And indeed, as far as those items are concerned,
 17 specialist bandages and indeed tourniquets as well, they
 18 would have been a matter of life or death, could they
 19 not, if applied promptly to people tragically injured by
 20 this atrocity?
 21 A. Yes, sir.
 22 Q. The use of Skeds. Skeds was also part of the emergency
 23 provision provided by MTFA; is that right?
 24 A. It is, yes.
 25 Q. There are a number of reason why Skeds are very

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1 important in situations like this. One such reason —
 2 it's in the experts' report at paragraph 13, the second
 3 report — one of the reasons that Skeds are very, very
 4 useful, if not essential, is so people can be moved in
 5 a dignified manner? So people can be moved in
 6 a dignified manner. It's an expression used by the
 7 expert. Would you agree with that?
 8 A. I would say it's more on a rapid extrication. People
 9 who are put on the Skeds, there's no sort of
 10 immobilisation, they're put on the Skeds and, as we said
 11 before, the Skeds are literally dragged across the floor
 12 to take the casualties out of major harm's way so they
 13 receive better treatment.
 14 SIR JOHN SAUNDERS: I think we understand. They're quick,
 15 you can assemble them quickly —
 16 A. Yes.
 17 SIR JOHN SAUNDERS: — and get them out of the danger area.
 18 I think Mr Cooper is talking about, in the context of
 19 this particular tragedy, when people were being moved on
 20 advertising hoardings and things like that and it is
 21 more dignified being moved on a Sked.
 22 A. I would agree with that, sir, yes.
 23 MR COOPER: I'm particularly referring to one of the
 24 findings from the experts on that matter, on the point
 25 of dignity, and sir, you and those listening well know

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1 why I raise that. I will move on.
 2 Can I ask you this, please, and move on to
 3 a different topic, Mr Fletcher. I'm asking you about
 4 Powerhouse.
 5 Powerhouse was dated 20 November 2017. It was
 6 a no-notice scenario, wasn't it?
 7 A. It was, yes.
 8 Q. And it was a similar situation to the Manchester Arena
 9 attack, wasn't it? A similar sort of situation?
 10 A. Yes, we tried to base some of it on the lessons that we
 11 learnt on the night of the arena.
 12 Q. In your paragraph 65, look at it if you will, it's this
 13 question. Powerhouse was delayed until
 14 20 November 2017. Delayed until 20 November 2017. Can
 15 you just help me, why was it delayed to such a time?
 16 A. Yes. Prior to obviously the arena incident, we were
 17 looking at a full mobilisation exercise, again trying to
 18 get other agencies involved. No real excuses, it's just
 19 the time factor that it takes to organise these things
 20 and the arena occurred before we'd managed to run the
 21 exercise. But there was planning in place at that time
 22 to run a no-notice mobilisation exercise.
 23 Q. I want to drill down a little into this because we're
 24 going to be putting to you there is a little bit of
 25 a theme developing here of slow responses to doing

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1 training and dragging feet about doing training. Do you
 2 understand why I'm asking these questions?
 3 A. Yes, I do, yes.
 4 Q. I'll be frank with you, Mr Fletcher. It's not a game,
 5 I'm not trying to catch you out. This is the aspect
 6 I want to examine now, whether certain training and
 7 certain exercises could have taken place far quicker,
 8 and certainly before the arena attack, to have given you
 9 and your colleagues a better opportunity of conducting
 10 what we all know they wanted to do.
 11 As far as Powerhouse is concerned, you tell us it
 12 was being discussed, I think being discussed, in the
 13 months preceding the arena attack.
 14 A. Yes, sir.
 15 Q. I would like to ask you for a little more clarity,
 16 please: at what levels were these discussions?
 17 A. These were multi-agency discussions. Again, we were
 18 quite committed to mobilising the full assets which
 19 would have included as well non-specialist appliances.
 20 It was trying to get other agencies to commit to
 21 mobilising their assets as well.
 22 I think based on what you were saying, the previous
 23 exercise that we'd done with MTFA had always started
 24 with the assets assembled, so it had been identified as
 25 a gap. There were discussions — again, I'm not trying

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1 to make excuses, but sometimes these things take a bit
 2 of time to get the commitment and resources.
 3 Q. Sorry to interrupt, but why? We're not talking here
 4 about casual matters. These things, as you put them,
 5 are serious exercises designed to save people's lives,
 6 so why does it take such a long time at times to get
 7 people to react to arranging these exercises?
 8 A. I think the truth of the matter is just trying to
 9 coordinate it. If you're doing it with the three
 10 agencies, you're trying to coordinate their resources,
 11 their availability, at the same time as yours. It's
 12 not — I'm not making excuses, but it's quite difficult.
 13 I totally accept what you're saying in the delay for the
 14 exercise taking place.
 15 Q. I'm asking about Powerhouse at the moment. I will be
 16 asking you about other matters very shortly. But it's
 17 really not acceptable, is it, that such a length of time
 18 needs to be taken to get agreement between agencies to
 19 conduct very important exercises? It's not acceptable,
 20 is it?
 21 A. No, it's not.
 22 Q. And has it changed? Has this culture changed?
 23 A. Well, obviously I can't speak for what's happened since
 24 I retired in 2019. I do believe that a number of
 25 exercises — we did some quite significant mobilisation

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1 exercises, not necessarily MTFA, but there were reasons
 2 for that after the arena. My view is things did move
 3 forward. But there's not much more I can say on that,
 4 sir.
 5 Q. You don't sound too convinced, if I may put it to you.
 6 SIR JOHN SAUNDERS: Let's move on, Mr Cooper. That's a bit
 7 of a comment.
 8 MR COOPER: This simple question then. Was the main problem
 9 the police?
 10 A. Well, I say, on that one, we... Trying to coordinate
 11 through multi-agencies, yes, sometimes it is difficult
 12 to coordinate the three agencies together at the same
 13 time.
 14 SIR JOHN SAUNDERS: So who in particular was saying it was
 15 difficult for them to arrange a date when they could all
 16 do it?
 17 A. I wouldn't say... I wouldn't put the blame on the
 18 police for that, sir. I mean, as it happened, we were
 19 in the throes — we could have done the exercise with
 20 our own assets, but I don't think there was the
 21 commitment at the time from the police to do
 22 a multi-agency exercise.
 23 SIR JOHN SAUNDERS: I want to divide this up. Please
 24 forgive me, Mr Cooper. The original Powerhouse you were
 25 trying to arrange before the arena attack took place?

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1 A. That's right, sir, yes.
 2 SIR JOHN SAUNDERS: And did you realise that there was
 3 urgency to do that, bearing in mind the problems which
 4 had arisen on the two previous exercises before that?
 5 A. We'd realised about the problems and the — I would say,
 6 yes, the urgency.
 7 SIR JOHN SAUNDERS: It was a severe warning of a terrorist
 8 attack which presumably influenced you to think we need
 9 to get this done soon? Things went so wrong on
 10 Winchester Accord, didn't they?
 11 A. They did, sir, yes.
 12 SIR JOHN SAUNDERS: And they weren't that much better on the
 13 next one, the tabletop one, the name of which I'm afraid
 14 I have forgotten.
 15 A. Hawk River.
 16 SIR JOHN SAUNDERS: Thank you. As from then you realised it
 17 was urgent to get these things done and you couldn't do
 18 it on your own because of the problems with the
 19 coordination between the three different organisations?
 20 A. That's correct, sir, yes.
 21 SIR JOHN SAUNDERS: It wouldn't be much use doing it on your
 22 own?
 23 A. No, but if it came to the crux, we would have carried
 24 out a single—agency exercise.
 25 SIR JOHN SAUNDERS: Is there any reason why it couldn't have

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1 been organised before the arena attack?
 2 A. On this answer, sir, no.
 3 SIR JOHN SAUNDERS: After the arena attack, did that
 4 involve — you still wanted to do the training, but did
 5 you have to restructure the training to try and take
 6 into account what had happened at the arena or not?
 7 A. The actual front end MTF A response, I think, pretty much
 8 hit the mark. It should have been used on the night, it
 9 wasn't. I don't think there was too much more we could
 10 have learned from that. The communication and the
 11 mobilisation was the issue and obviously with Powerhouse
 12 we did do it as a multi—agency — it wasn't done to the
 13 level ... There was internal issues with senior
 14 management and the representative bodies to mobilise the
 15 full suite of assets, but we did manage to do the key
 16 aspect, really, which was testing that Airwave channel
 17 and mobilisation of certain assets as well.
 18 SIR JOHN SAUNDERS: On Powerhouse?
 19 A. Yes.
 20 SIR JOHN SAUNDERS: So the arena didn't really make
 21 a difference to your planning for this because it just
 22 actually emphasised that the things that went wrong in
 23 those exercises went wrong in real life as well,
 24 unhappily?
 25 A. Yes, sir.

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1 SIR JOHN SAUNDERS: So was there an increased sense of
 2 urgency after 22 May or was it much the same as before?
 3 A. No, but there was an increased sense of urgency to get
 4 an exercise done. Obviously the main things was
 5 obviously getting the Airwave channel in place. We had
 6 done a number of —
 7 SIR JOHN SAUNDERS: But that was already all signed up,
 8 wasn't it, already done?
 9 A. It was, but there was again some elements of testing of
 10 that, of that system, and again there was quite a few
 11 things that needed to be ironed out on the use of the
 12 Airwave.
 13 SIR JOHN SAUNDERS: So Powerhouse happened in November
 14 because of increased urgency.
 15 A. Yes.
 16 SIR JOHN SAUNDERS: But for the arena, it might have taken
 17 even longer to get Powerhouse together?
 18 A. It's a difficult question, that, sir. I think we would
 19 have —
 20 SIR JOHN SAUNDERS: Okay.
 21 A. We would have run a mobilisation exercise even if the
 22 arena hadn't occurred. Whether it would have occurred
 23 in the November, I couldn't honestly tell you.
 24 SIR JOHN SAUNDERS: Mr Cooper, thank you. I probably
 25 covered a few things you were going to cover. I'm sorry

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1 about that.
 2 MR COOPER: You have, sir, but that's very helpful.
 3 The common denominator to all these problems is the
 4 police, isn't it? We're going to go through some other
 5 examples in a moment. We're going to go through
 6 a number of other examples in fact. But I'm asking you
 7 to concede, if you will, that the common denominator
 8 with problems in all this was the police.
 9 A. There were issues with the police at times, yes.
 10 Q. Common denominator. Whenever there were issues, it was
 11 the police causing the issues. It wasn't necessarily
 12 NWAS, it wasn't necessarily yourselves; it was the
 13 police, wasn't it?
 14 A. Yes, sir.
 15 Q. Thank you. Do you know why they were seemingly being so
 16 obstructive?
 17 A. No, sir, I can't comment on that.
 18 Q. All right. Prior to Winchester — I'm looking at your
 19 paragraph 60 — you say:
 20 "Prior to Winchester there were other examples of
 21 multi—agency training exercises which caused [you]
 22 concern."
 23 You say that there was too great a police focus on
 24 their role in isolation. Do you see that first
 25 sentence?

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1 A. I do, yes.
 2 Q. So there it is. The theme of my next tranche of
 3 questions is going to be the police. What do you mean
 4 by:
 5 "There was too great a police focus on their role in
 6 isolation"?
 7 Does that mean they weren't particularly interested
 8 in ambulance or fire but simply what they were doing?
 9 A. I would say that's fair comment on those exercises. The
 10 first one that took place early on in the year, I'll not
 11 mention the venue, but it's an iconic site in
 12 Manchester. It is in my statement, obviously, for you
 13 to see. There was a lot of planning. The police had
 14 done a number of exercises, single agency, and then the
 15 final one was a multi-agency exercise. We provided the
 16 MTFA resources with NNAS. As the exercise progressed,
 17 once the police had neutralised the threat they called
 18 an end to the exercise --
 19 SIR JOHN SAUNDERS: I think you've already indicated to me,
 20 their concern was neutralising the threat. Once they'd
 21 done that, the follow-up exercise, which would involve
 22 casualties and things like that, the police thought they
 23 had done their bit and they didn't play much part in
 24 that? Is that fair?
 25 MR COOPER: And I am not going to mention the site either,

1 I have it in front of me and I know what you're talking
 2 about. This was 13 January 2014; is that right?
 3 A. Yes, sir, it is.
 4 Q. And it was very clear as far as that exercise was
 5 concerned what its purpose was, wasn't it: cooperation
 6 between multi-agencies?
 7 A. Yes, sir.
 8 Q. So the police would have known full well the purpose of
 9 this exercise was to develop efficient working to save
 10 lives through cooperation with other agencies?
 11 A. Yes, sir.
 12 Q. And yet they left when they did their bit?
 13 A. Yes, sir.
 14 Q. Is that right?
 15 A. Yes, sir.
 16 Q. You must have been very disappointed in their behaviour?
 17 A. That's a fair comment. I would say there was, with
 18 myself and my ambulance colleague on the night, there
 19 were strong words that were expressed. And then, as you
 20 can see from there, there was another exercise later on
 21 in the year. We were invited back to -- we were given
 22 the understanding that the exercise would run its full
 23 course. I think I mentioned the other week that NNAS
 24 put a considerable amount of money into making it
 25 a realistic scenario and the same thing happened. On

1 that occasion we refused to yield and we carried on with
 2 the exercise to test our capabilities.
 3 Q. Did the police show more interest in taking part on that
 4 occasion?
 5 A. Again, they did the end ex at the point where they felt
 6 that they'd achieved their objectives. We refused and
 7 we carried on. I can honestly say there were quite
 8 a few officers who were walking through who weren't
 9 really paying that much attention to the elements that
 10 we were doing at that time.
 11 Q. Were these senior officers?
 12 A. I can't remember whether they were senior officers or
 13 firearms officers, sir.
 14 Q. Again, I'm developing this theme and there's still
 15 a further list I am going to put to you. You're being
 16 perfectly frank, Mr Fletcher, let me indicate to put
 17 your mind at risk, these aren't personal criticisms at
 18 you, I'm just asking you questions based on your
 19 evidence. Effectively, so far we have a situation where
 20 all agency seem interested in these exercises, which are
 21 designed to save lives and protect people, but the
 22 police seem to take a step back from the (inaudible:
 23 distorted); is that right?
 24 A. On these exercises, I would agree with you, yes.
 25 Q. But it goes further. Let's carry on. I'm just

1 examining how engaged the police were in their duties to
 2 protect life before the arena.
 3 Let me move on to JESIP if I can. JESIP was
 4 introduced nationally, wasn't it, in 2013, with initial
 5 training in 2014? Is that right?
 6 A. It is, yes.
 7 Q. And was there concern, I think it's your paragraph 51,
 8 that JESIP was not being embraced fully across emergency
 9 services in Greater Manchester?
 10 A. Yes, I think when the initial training was carried out
 11 in 2014 there wasn't any sort of follow-up that was put
 12 in place. It wasn't just about training, it's embedding
 13 the JESIP culture into the culture of the organisations.
 14 From my perspective there were a number of the exercises
 15 where fire and ambulance were routinely engaged, the
 16 police weren't, so that's one element of JESIP. But
 17 JESIP --
 18 Q. Sorry, the police -- did you say fire and ambulance were
 19 engaged but the police weren't?
 20 A. On certain MTFA exercises, which is what I was referring
 21 to about the ongoing training that took place at
 22 Ashburton Point in Manchester.
 23 Q. I'm looking again at your paragraph 51. You say five
 24 lines down:
 25 "Having done our annual MTFA training with NNAS at

1 Ashburton Point, we had reached the stage where the
 2 police were routinely not involved in joint training."
 3 You use the word "routinely". What do you mean by
 4 "routinely"?
 5 A. The fact that on that training, it was just NWS and
 6 Greater Manchester Fire. What was also coming back ---
 7 I mean, the thing for the training for the MTFA side of
 8 it is we work under the guidance with NWS, so it's
 9 quite critical that we have joint training with NWS.
 10 But obviously you need to look at the whole piece of the
 11 MTFA, working with the tactical firearms commanders and
 12 the firearms teams as well. So obviously, based on that
 13 as well, we reintroduced some maintenance of skills
 14 training with the police firearms unit as well.
 15 Q. But the fact that the police were routinely not
 16 participating in this aspect of training was of concern
 17 to you and your colleagues?
 18 A. Yes, it was, sir, and certainly the operational crews
 19 had voiced their concern that they were doing quite
 20 regular training with NWS but they felt they needed to
 21 do some more with the firearms teams as well.
 22 Q. What sort of training was it, very briefly, in
 23 a sentence, if you can? Was it training as far as
 24 caring for casualties is concerned or other such
 25 training?

25

1 A. Yes. The training is what I referred to earlier on,
 2 where we would go down for a day, there would be
 3 re-familiarisation with the bandages, use of
 4 tourniquets, and then in the afternoon there would be an
 5 exercise, practical exercise, that would take place.
 6 NWSOs would attend that training and act as the on-scene
 7 commander with their counterparts from the Ambulance
 8 Service and we would do an exercise to extract
 9 casualties from an MTFA type scenario.
 10 SIR JOHN SAUNDERS: Obviously, NWS and the Fire Service ---
 11 NWS first, primarily dealing with casualties, but as
 12 we have heard, the Fire Service, particularly with
 13 special crews, is very good at giving assistance and is
 14 trained by the Ambulance Service to give assistance.
 15 The police are actually not in that category of being
 16 trained to get that sort of assistance for medical
 17 purposes?
 18 A. No, sir. The main focus for the police was to
 19 neutralise the threat. The casualty care was
 20 predominantly for Ambulance and Fire.
 21 SIR JOHN SAUNDERS: So the coordination with the police was
 22 for them to know the importance when they got the area
 23 cleared or they sent the armed officers that once it was
 24 cleared they should give priority to getting the medics
 25 and the Fire Service in there to deal with casualties?

26

1 A. That's correct.
 2 SIR JOHN SAUNDERS: That's what the training would be
 3 involving?
 4 A. It is, yes.
 5 MR COOPER: On the back of your question, sir, can I ask you
 6 this, Mr Fletcher: firearms officers, for instance,
 7 would carry a significant amount of sophisticated
 8 medical equipment, wouldn't they?
 9 A. To answer you, sir, I can't answer that question,
 10 I don't know what they actually physically carried.
 11 Q. Well, here's an extra suggestion. It may well be we can
 12 clarify it at a later stage. The firearms officers
 13 would have such capabilities and therefore have the
 14 capability of applying that care to casualties and the
 15 exercises that we have spoken of here would include
 16 advice and guidance as to how to do that. Could you
 17 answer that question? If you can't, I'll move on.
 18 A. I can't answer that question, sir. I don't know what
 19 the medical kit that the firearms officers had. That
 20 may be one that's more appropriate for Mr Gaskell who
 21 dealt with the MTFA training on a day-to-day basis.
 22 Q. I will move on.
 23 The suggestion I was about to put to you was this:
 24 can I suggest to you that the police failure to
 25 integrate and to be involved in training and exercises

27

1 goes back at least to Exercise Trump Card, doesn't it,
 2 which was 2001, when on that occasion the police failed
 3 to share information with Fire and Ambulance Services?
 4 Your paragraph 12.
 5 A. Yes. That was the exercise that was the genesis of the
 6 ILOs in London. It was more about the passage of
 7 sensitive information that could have been useful in the
 8 incident or the exercise.
 9 SIR JOHN SAUNDERS: Of course that pre-dated JESIP, which
 10 had put an emphasis on coordinated working?
 11 A. It did, sir, this was 2001.
 12 SIR JOHN SAUNDERS: But incidents before that?
 13 A. Yes.
 14 MR COOPER: I understand that, Mr Fletcher. I'm simply
 15 suggesting to you that the suggestion of lack of police
 16 integration or perhaps interest in these exercises
 17 doesn't just start with just before the arena. It had
 18 been going on for some time, hadn't it?
 19 A. Well, obviously on the Exercise Trump Card that was
 20 a significant failing, yes.
 21 Q. And the significant failure was there again the police,
 22 wasn't it?
 23 A. I think there was, yes, a lack of trust in sharing
 24 sensitive information.
 25 Q. As far as all these exercises are concerned, and I'm

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1 coming to Winchester Accord in a moment, the police
 2 haven't covered themselves in glory, have they, on this?
 3 SIR JOHN SAUNDERS: I'll decide that.
 4 MR COOPER: I'm sorry, sir?
 5 SIR JOHN SAUNDERS: I'll decide that, I think. We've heard
 6 the evidence.
 7 MR COOPER: Then I'll move on.
 8 Winchester Accord. So far as Winchester Accord is
 9 concerned, the police inspector at the inner cordon
 10 at the place where Winchester Accord was taking place
 11 would not allow fire and ambulance services into the
 12 cordon; that's right, isn't it?
 13 A. Yes, that was the information that was fed back to me
 14 from the operatives who were in attendance on the night
 15 and observers.
 16 Q. Any reason why the police inspector in that important
 17 exercise refused to allow fire and ambulance into the
 18 inner cordon?
 19 A. From the information I received back, it was a general
 20 lack of understanding as to what our capability was and
 21 how we would assist on that incident, that exercise.
 22 Q. Winchester Accord was a very important exercise, wasn't
 23 it?
 24 A. Yes, it was.
 25 Q. And are you saying that when this exercise was

29

1 conducted, the police displayed a lack of understanding
 2 as to what ambulance and fire capabilities were in this
 3 context?
 4 A. I think in that context at that point in time and at
 5 that venue, which is the rendezvous point, the police
 6 officer involved didn't understand — certainly maybe
 7 understood more about the NWAS capabilities, but
 8 certainly didn't understand what the Fire Service could
 9 provide, no.
 10 Q. Did not understand —
 11 SIR JOHN SAUNDERS: Okay, this is to do with letting
 12 somebody in to an area where a bomb's gone off or there
 13 is a gunman who is firing and really a lack of
 14 understanding of the fact that you are trained to work
 15 in those situations?
 16 A. In the warm zones areas, I would say yes. And as a bit
 17 more context, we couldn't get through to the tactical
 18 firearms commander. I think the tactical firearms
 19 commander on that exercise located in the control suite
 20 and —
 21 SIR JOHN SAUNDERS: And it's important that it's the
 22 tactical firearms commander who decides when and where
 23 you go to, which is the warm area?
 24 A. Yes. That's the joint briefing that takes place.
 25 That's agreed, but the tactical firearms commander will

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1 call the shots on that, certainly the location of the
 2 hot zone.
 3 MR COOPER: And the delay in the officer allowing access
 4 into the inner cordon was the direct cause of the
 5 1.5-hour delay in Winchester Accord; is that right?
 6 A. I think that's a combination of the lack of the call
 7 coming in initially from the force duty officer. There
 8 was a significant delay that we stayed at the rendezvous
 9 point for. Then I think, as Mr Lawlor said last week,
 10 the decision was taken in the exercise planning team
 11 that they will move forward —
 12 SIR JOHN SAUNDERS: I'm sorry to stop you. I've got all
 13 that. So thank you very much, but I do understand.
 14 MR COOPER: The MTFA and warm zone working necessitates,
 15 does it not, multi-agency and site collaboration?
 16 A. Yes, sir, it does.
 17 Q. Moving on, I want to ask you a little bit about — you
 18 were asked and I have checked the real time over the
 19 period of time we've had, so I'm not going to go over
 20 what's been dealt with. But you asked Superintendent
 21 Leor Giladi of the Greater Manchester Police to chair
 22 the JESIP user group; is that right?
 23 A. That's correct, yes.
 24 Q. And you have already been asked about his non-attendance
 25 and we see his statement as well to that effect. I'm

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1 not going to go over that. But with the exceptions of
 2 Greater Manchester Police, did other attendees have
 3 a consistent, individual presence at those meetings?
 4 A. Yes, sir, they did.
 5 SIR JOHN SAUNDERS: You told us, is it Sergeant Henderson?
 6 A. Yes, he was the regular attendee from GMP. As I said
 7 last week, sir, GMP always did attend the JESIP
 8 meetings.
 9 SIR JOHN SAUNDERS: But the personnel changed quite a lot?
 10 A. Tended to change over, yes.
 11 MR COOPER: But as far as the other emergency services were
 12 concerned, the personnel remained consistent; is that
 13 right?
 14 A. Yes, on the whole, yes, they did.
 15 Q. After Superintendent Giladi retired, the chair's
 16 responsibilities, you say, were delegated to whichever
 17 agency hosted the meeting. That's what you said?
 18 A. That's correct, yes.
 19 Q. You say you were not keen on this because it impacted
 20 potentially upon lack of ownership and follow-up
 21 actions. Do I understand your evidence correctly?
 22 A. You do, sir. It's just a personal choice of mine that
 23 if somebody is chairing a group, they continue to
 24 chair it.
 25 SIR JOHN SAUNDERS: You thought that actions would be more

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1 likely to be followed up if you had a consistent
 2 chairman who could organise it rather than the chairman
 3 changing on the basis (overspeaking). I am just
 4 paraphrasing your evidence from before.
 5 A. Yes.
 6 MR COOPER: While not paraphrasing, let me read to you
 7 directly the short passage of evidence you gave which I
 8 want to examine. It's page 85 of real time. You were
 9 asked by the chair:
 10 "How would actions get followed up if there was no
 11 chair monitoring it?"
 12 And you said this:
 13 "Actions probably — what we would do every meeting,
 14 there would be — the chair would go through the action
 15 summary where we were up to with progress. I wouldn't
 16 say exactly at this group that things weren't followed
 17 up, it was just a personal choice of mine from a history
 18 of dealing with management groups, I prefer that
 19 a single chair who is just there — it is just this
 20 peripatetic, whoever hosted it. It was something —
 21 a personal choice."
 22 And your attitude to a consistent chair being able
 23 to follow up actions was an important one, wasn't it,
 24 because it enabled things to happen and things to be
 25 done? Is that right?

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1 A. Yes, sir. As I say, that's my personal choice. I've
 2 chaired a number of groups. I prefer the single
 3 ownership, again, to progress issues so actions don't
 4 generally drift from meeting to meeting.
 5 Q. And things can get missed, can't they?
 6 A. Yes, they can.
 7 Q. Does that remain a concern that you have in relation to
 8 this particular committee's business?
 9 A. Again, I can't comment on that, sir. Obviously since
 10 retiring in 2019, I haven't been involved in the group,
 11 I don't know how it's governed or the governance
 12 structure that's in place currently.
 13 SIR JOHN SAUNDERS: Okay. I well understand your own
 14 personal preference and you may be entirely right for
 15 all I know. Do you have examples or did it happen, as
 16 far as you're concerned, that actions were not followed
 17 up satisfactorily because of having the change of
 18 chairmanship?
 19 A. I don't have any practical examples of that. Certainly
 20 in the JESIP meeting, sir, it's probably more to do with
 21 other groups that I have been involved with where that
 22 structure was in place.
 23 SIR JOHN SAUNDERS: So as far as you're concerned, not the
 24 best system. We know there are failings in joint
 25 working but you wouldn't attribute any of the failures

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1 specifically to that changing chairmanship?
 2 A. No.
 3 SIR JOHN SAUNDERS: Mr Cooper, I just wanted to intervene to
 4 be entirely fair on the evidence that has been given, as
 5 you will understand.
 6 MR COOPER: I understand and on the back of those answers
 7 I'll move on.
 8 Hawk River. Again, I don't need to go into any
 9 detail, but that was a date of 1 March 2017, so very
 10 shortly before the arena atrocity. That's right, isn't
 11 it?
 12 A. It is, yes.
 13 Q. You say, it's your paragraph 63 if you want to reference
 14 it:
 15 "It was important to establish an Airwave radio
 16 channel following Hawk River."
 17 Do you see that:
 18 "It was important to establish an Airwave radio
 19 channel following Hawk River?"
 20 A. Yes.
 21 Q. Why was it important?
 22 A. It was obviously from the content of the JOPs. It is
 23 clearly identified in there the necessity for
 24 establishing that method of communication.
 25 Q. And JOPs 3 took effect in January 2016, didn't it?

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1 A. It did, yes.
 2 Q. And it was a channel for all three agencies to use in
 3 the event of an incident?
 4 A. It was. The police would instigate the channel to
 5 communicate with the other agencies, yes.
 6 Q. And it was for the Greater Manchester Police to lead
 7 upon implementing this, wasn't it?
 8 A. My view was because it was the police who had
 9 instigated, the police controlled the interoperability
 10 channels and it would be for them to develop that
 11 system, yes.
 12 Q. And this was Hawk River, as we have established,
 13 1 March 2017. In short, what important benefits would
 14 that have had on 22 May 2017?
 15 A. Well, it would have allowed possibly ease of declaration
 16 of Plato, if it was over the Airwave channel, and the
 17 communication of key information such as if the
 18 rendezvous point had changed, the FCP —
 19 SIR JOHN SAUNDERS: Everyone would know what was going on?
 20 A. Yes, sir.
 21 There is one thing I would just like to add, and I'm
 22 sorry if I might give a question rather than give an
 23 answer —
 24 SIR JOHN SAUNDERS: No, you carry on.
 25 A. But prior to Hawk River — sorry, after Hawk River

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1 in the development of the protocol I never actually saw
 2 what the protocol was. The Airwave channel was in
 3 place, the testing had been done. What I am unclear on
 4 and I am unclear to this day is if that still involved
 5 the necessity for making a telephone call. If it did,
 6 the police would then phone ambulance and Fire Service
 7 and say, "We are going to instigate the Airwave
 8 channel". I think on the night that might still have
 9 impacted. I don't think that would have been -- it
 10 might not have worked as we anticipated.

11 If that would have come across my desk I wouldn't
 12 have batted an eyelid at it because I would have
 13 thought, yes, that's fine. The fact that we didn't get
 14 told about Plato being declared would lead me to believe
 15 if that was the system that was in place, we wouldn't
 16 have got that phone call in any case.

17 What happened, again, I know we're going to go into
 18 the -- after the arena. But on 26 May, when we had the
 19 meeting at police headquarters, a lot -- as I said
 20 before, the background work had been done, the channel
 21 had been identified, it had been tested, and the
 22 protocol that was put in place there was based on the
 23 learning of what happened on the night of the attack,
 24 that it needed to be constantly open, constantly
 25 monitored, it was tested three times a day. I doubt it

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1 would have been -- within the protocol that was probably
 2 being developed it wouldn't have been tested anything
 3 like as much as that, so I still think there may have
 4 been problems with it on the night.

5 MR COOPER: There might have been problems, Mr Fletcher --
 6 this is all "might" -- but it would have been of
 7 significant importance on the night of the
 8 22nd May 2017, wouldn't it?

9 A. Yes, it would.

10 SIR JOHN SAUNDERS: And according to JOPs 3 it should be
 11 done?

12 A. Yes, sir.

13 SIR JOHN SAUNDERS: And there was no reason why it shouldn't
 14 have been done?

15 A. No, sir.

16 MR COOPER: In your paragraph 64, you say:

17 "It took the arena incident to bring this matter to
 18 a head."

19 What do you mean by that:

20 "It took the arena incident to bring this matter to
 21 a head"?

22 I'm just interested in how you phrase it.

23 A. It's basically what I've just said to the chair, that
 24 although the protocol wasn't -- there wasn't a protocol,
 25 a written protocol in place, we did use it on the night

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1 again as more of a hope than expectation, as I've
 2 previously said.

3 But the arena -- after the arena we had the meeting
 4 at police headquarters and it was the learning from the
 5 arena that that channel needed to be constantly
 6 monitored, constantly open, and tested three times
 7 a day. Again part of that was to get muscle memory for
 8 the operatives, certainly in the police control room.

9 SIR JOHN SAUNDERS: And as I understand it as well, the
 10 force duty officer was saying, I think at Hawk River,
 11 "Actually, I just don't have time to do that".

12 A. He did, yes.

13 SIR JOHN SAUNDERS: "I've got too many other things to do."

14 So the reality is, it should have been sorted before
 15 22 May?

16 A. Yes.

17 SIR JOHN SAUNDERS: When it was identified after 22 May as
 18 being a significant problem that it wasn't working, then
 19 everyone actually did something about it?

20 A. Yes.

21 SIR JOHN SAUNDERS: So describing bringing things to a head
 22 or whatever, that's what happened?

23 A. It is, yes.

24 MR COOPER: Looking back at your evidence very briefly, on
 25 real time pages 85 to 86 on this, you said this:

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1 "I think it had been discussed because what we
 2 didn't know was what the three-way communications looked
 3 like."

4 You go on to say:

5 "Neil [Neil Gaskell] asked, 'What's three-way
 6 communication? Is it a conference call facility?'"

7 That's the evidence you gave to the learned chair on
 8 a previous occasion.

9 A. That's correct, yes.

10 Q. When Neil Gaskell asked, "What's three-way
 11 communication? Is it a conference call facility?", how
 12 did you feel when he said that?

13 A. To be fair, it was the other way round. I asked him the
 14 question, when I read the JOPs, what is it. There's
 15 a three-way uninterrupted communication link between the
 16 controls and then it mentioned the uninterrupted
 17 interoperability channel. So like I say, at the time,
 18 did this -- certainly the communication between the
 19 controls, was it just -- is it a conference call
 20 facility that needed to be implemented that I didn't
 21 know? Is it just a telephone line that's like open?
 22 And I think from watching the evidence the other week
 23 that might have been tested by the HMI when they went to
 24 the GMP. I was asking the question what does this look
 25 like because I genuinely didn't know.

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1 Q. When were you asking these questions? At what stage
2 were you asking these questions? After the arena?
3 A. No, this was before, and obviously just before
4 Hawk River as well. So I think those questions were
5 part of the debate at the Hawk River exercise.
6 Q. The Hawk River exercise, 1 March 2017, you're still
7 debating between yourselves what the three-way
8 communication looks like which was directed by JOPs in
9 January 2016?
10 A. Yes, that's fair comment.
11 SIR JOHN SAUNDERS: Does JOPs 3 make it clear what it is?
12 A. No, it just says there will be an uninterrupted
13 communication, I believe, between the control rooms, and
14 then it also — in the next paragraph, I think it says
15 about an interoperability channel. So it doesn't —
16 I don't think it gives specifics as to what you do. And
17 certainly from the Hawk River exercise, this wasn't
18 unique to Greater Manchester, the other counties were
19 in the same position. This was a regional exercise. We
20 didn't have a consistent approach to how that was
21 implemented.
22 MR COOPER: It took, forgive me for emphasising this
23 question, it took 15 minutes to devise a solution to put
24 in place over a conversation in a cafeteria; is that
25 right?

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1 A. Yes, sir. Obviously based on the fact that a lot of the
2 background work on the channel and the testing had
3 already been done. The constant channel being open was
4 a learning outcome from the arena itself.
5 Q. So effectively you're saying, if I do your evidence
6 justice, a significant amount of work had been done
7 behind the scenes before the arena, but the important
8 steps were not put in place which could have potentially
9 saved lives in the arena, and that was put right
10 15 minutes later with a 15-minute chat in a cafeteria?
11 Is that right?
12 A. Yes.
13 Q. Why couldn't that 15-minute chat in a cafeteria, or
14 anywhere, have taken place before the arena?
15 SIR JOHN SAUNDERS: I think that's really a question not
16 necessarily expecting an answer, Mr Cooper.
17 MR COOPER: Some of my questions are. Actually that one
18 wasn't. But I'll be guided by you, sir.
19 SIR JOHN SAUNDERS: Okay. They hadn't got round to doing
20 it is the answer.
21 A. Like I say, a lot of the background work had been done.
22 The protocol — I never saw a protocol, hence that's the
23 questions I was raising before, if it was still going to
24 require a telephone call to instigate it, which I think
25 is the word it says in the JOP. The meeting in the

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1 canteen at GMP Headquarters on the 26th, we put
2 together — obviously the use of the channel, the
3 testing had been done, but it was also again the
4 learning from the night of the arena. So there was
5 elements of that to be considered, yes, sir.
6 MR COOPER: I have one more question and that's it. Would
7 you agree, in the analysis that we've undertaken
8 together, and indeed the analysis that has been
9 undertaken with you by others, that what happened on the
10 night of the arena, as far as the emergency services
11 were concerned, was a failure of process, failure of
12 leadership and a failure of culture?
13 SIR JOHN SAUNDERS: If you like, answer those — there are
14 three questions there. Was it a failure of process?
15 A. Yes, sir.
16 SIR JOHN SAUNDERS: Was it a failure of leadership?
17 A. The leadership side of it is a difficult one, sir,
18 because they'll be following — the leadership will be
19 following the process that had been put in place.
20 SIR JOHN SAUNDERS: Was it a failure of culture?
21 A. I wouldn't say so much culture, looking at the Fire
22 Service and things being risk averse. I wouldn't agree
23 with that at all. I think it was a failure of obviously
24 process and communication, sir.
25 MR COOPER: Thank you, sir. I have no further questions.

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1 SIR JOHN SAUNDERS: Thank you very much, Mr Cooper.
2 MS CARTWRIGHT: The final advocate who has questions for
3 Mr Fletcher is Mr Warnock.
4 MR WARNOCK: In fact, sir, everything that I would have
5 asked has been covered, so I have no questions.
6 SIR JOHN SAUNDERS: Okay, thank you very much, Mr Warnock.
7 MS CARTWRIGHT: Sir, I have no further questions.
8 Do you have any other questions at this stage for this
9 witness?
10 SIR JOHN SAUNDERS: No, I've asked you too many already.
11 Thank you very much, Mr Fletcher. That's the end of
12 your evidence. We are all very grateful for your
13 assistance and your time and I think we're going to have
14 a break now before we start the next witness.
15 MS CARTWRIGHT: I would ask that we take the morning break
16 now. Mr Whittle is the next witness.
17 SIR JOHN SAUNDERS: How long do you want?
18 MS CARTWRIGHT: Can I ask for 15 minutes?
19 SIR JOHN SAUNDERS: You can certainly have 15 minutes.
20 (11.00 am)
21 (A short break)
22 (11.20 am)
23 MR GREANEY: Sir, the gentleman in the witness box is
24 David Whittle and I will ask that he be sworn, please.
25

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1 MR DAVID WHITTLE (sworn)
 2 Questions from MR GREANEY
 3 MR GREANEY: Tell us your full name, please?
 4 A. David Andrew Whittle.
 5 Q. Did you retire from Greater Manchester Police in
 6 December 2018?
 7 A. I did, yes.
 8 Q. At the time of your retirement, did you hold the rank of
 9 temporary inspector?
 10 A. Yes, I did.
 11 Q. Were you seconded to the Metropolitan Police Service
 12 working on the National Counter-terrorism Armed Policing
 13 Team?
 14 A. I was, yes.
 15 Q. Had you been seconded to that team between July of 2017
 16 and December 2018?
 17 A. Yes. That's correct.
 18 Q. Without entering into any areas that are operationally
 19 sensitive, are you able to explain in a few sentences
 20 what your role was on secondment?
 21 A. Yes, I can do. My role within the team, although the
 22 team covered a number of different aspects, my specific
 23 portfolio was ARV capabilities and organisational
 24 learning.
 25 Q. I'm going to deal, before we get into the substance of

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1 your evidence, with your background, career and
 2 training. By way of background, on leaving school did
 3 you serve for 5 years in the British Army?
 4 A. I did, yes.
 5 Q. And then join Greater Manchester Police in October 1991?
 6 A. That's correct.
 7 Q. Initially were you posted to the Wigan Division?
 8 A. I was, sir, yes.
 9 Q. And in the early stage of your career did you serve
 10 mainly on proactive units, including drugs and burglary
 11 units?
 12 A. That's correct, sir.
 13 Q. I should have indicated, there are three statements of
 14 Mr Whittle. I'm going to be principally using the third
 15 statement, which is at divider 3. So this is the very
 16 recent statement that you have given, Mr Whittle. The
 17 23-page statement which is dated 17 February of this
 18 year.
 19 In May 1998 did you attend your initial combined
 20 authorised firearms officer, or AFO, and armed response
 21 vehicle, ARV, course?
 22 A. I did, sir.
 23 Q. For how long did that course last?
 24 A. It lasted 4 weeks.
 25 Q. Did that course provide basic shooting and tactical

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1 training?
 2 A. It did, sir.
 3 Q. For dealing with people on foot, in vehicles and in
 4 buildings?
 5 A. That's correct.
 6 Q. We won't go into the location at which that course was
 7 conducted, but was it delivered by members of the GMP
 8 Firearms Training Unit?
 9 A. It was.
 10 Q. Facilitated by accredited national firearms instructors?
 11 A. That's correct.
 12 Q. Later that year, in November 1998, did you join
 13 a tactical firearms unit of Greater Manchester Police?
 14 A. I did.
 15 Q. And from then until January 2005, did you serve on the
 16 ARVs?
 17 A. I did, sir.
 18 Q. And also for a short time on the operational teams
 19 within the tactical firearms unit?
 20 A. That's correct.
 21 Q. Again, without going into matters that might be
 22 operationally sensitive, what is the role of ARVs?
 23 A. ARVs are on patrol 24 hours a day, 365 days a year, and
 24 they respond to spontaneous firearms incidents.
 25 Q. So might one describe those units or their role as

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1 reactive?
 2 A. Yes.
 3 Q. You mentioned that you spent a short time also on an
 4 operational team. What is the difference between
 5 an operational firearms team and an ARV firearms team?
 6 A. The operational teams, they will be allocated to
 7 pre-planned incidents, so jobs that the force are aware
 8 of and that we are able to apply more options to assist
 9 the commander in achieving the working strategy. So
 10 a broader depth of options available to the commander
 11 for a pre-planned incident because obviously we have
 12 more time to be able to plan.
 13 Q. So another way of describing that might be, and tell me
 14 if I've got this wrong, that their work is more
 15 proactive than the ARVs?
 16 A. I wouldn't say it is more proactive, sir. What I would
 17 say is it's more finite because we are aware of the
 18 incident, we're aware of the working strategy and the
 19 risk assessment that's attached to that, so therefore
 20 we are able to provide far more options to ensure that
 21 we can take control of the incident rather than the
 22 incident occurring and us having to then try to take
 23 control of it. We are already in control of it from the
 24 start.
 25 SIR JOHN SAUNDERS: So we're talking about occasions when

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1 you might need to go and arrest somebody who is believed
 2 to have a firearm in their possession?
 3 A. Exactly, yes.
 4 MR GREANEY: During the time that we've just been dealing
 5 with, 1998 to 2005, did you successfully undertake
 6 a course to become an accredited operational firearms
 7 commander or OFC?
 8 A. I did, yes.
 9 Q. Did that training last for a week?
 10 A. Yes.
 11 Q. And again, was that delivered by officers of Greater
 12 Manchester Police?
 13 A. It was.
 14 Q. In your experience, what is the role of an OFC?
 15 A. The operational firearms commander, sir, will work
 16 within an agreed level of authority under the direction
 17 of the tactical firearms commander, be that the initial
 18 tactical firearms commander or the cadre tactical
 19 firearms commander, to command officers on the ground to
 20 ensure the plan agreed by the tactical firearms
 21 commander is actioned to enable the working strategy to
 22 be met.
 23 Q. I'm going to jump ahead slightly in your statement so as
 24 to ensure we maintain the chronology. I'm at
 25 paragraph 8. In 2005, did you join a particular unit

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1 within GMP?
 2 A. I did, sir, I joined the Firearms Training Unit.
 3 Q. What was your role within that unit?
 4 A. I became a national firearms instructor.
 5 Q. In order to perform that role, did you complete the
 6 national firearms instructor's course?
 7 A. I did, yes.
 8 Q. Was that a course that was 5 weeks in duration and based
 9 around the national police firearms training curriculum?
 10 A. It was.
 11 Q. As a firearms instructor from 2005, what did your role
 12 involve?
 13 A. It obviously evolved with the further training and
 14 further qualifications that I achieved, but initially,
 15 sir, the role of a firearms instructor is to devise
 16 lesson plans to achieve the role profiles of the various
 17 functions that are to be trained by that unit. The role
 18 profiles are laid down and set and prescribed, should
 19 I say, by the chief firearms instructor.
 20 Q. Were you a firearms instructor between January of 2005
 21 and May of 2009?
 22 A. Yes, I was.
 23 Q. In May 2009 did you then go on an attachment in the role
 24 of temporary sergeant to Tameside Division?
 25 A. I did, sir.

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1 Q. Remaining in that position for around about 8 months?
 2 A. That's correct.
 3 Q. I'm just going back in your statement to paragraph 7.
 4 In May 2009 did you attend a further course designed to
 5 train you to become a firearms tactical adviser?
 6 A. Yes, I did.
 7 Q. That, I think, was a two-week course; is that correct?
 8 A. It was, sir.
 9 Q. What is the role of a firearms tactical adviser?
 10 A. The firearms tactical adviser will provide advice to
 11 tactical firearms commanders be that the initial TFC or
 12 the cadre TFC on options, tactical options, which best
 13 meet the working strategy. Obviously, that would be
 14 within the scope of the officers that are attending, so
 15 if they are the officers who are attending or
 16 operational teams officers attending, those options
 17 would be markedly different.
 18 Q. So for planned firearms operations would the role of
 19 a firearms tactical adviser involve participating in
 20 full risk assessments in liaison with the duty cadre
 21 TFC?
 22 A. It would, yes.
 23 Q. And during a spontaneous operation what would the role
 24 of firearms tactical adviser involve?
 25 A. The TAC adviser would be available to the initial

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1 tactical firearms commander to offer advice and, as
 2 a result of providing that advice, the TAC adviser would
 3 no longer take part in the operation as a result of
 4 giving that advice. So they would then remain
 5 constantly available to the initial tactical firearms
 6 commander.
 7 Q. The term initial tactical firearms commander is one that
 8 we have come across and what we've understood is that
 9 within Greater Manchester Police that is a role that
 10 would be held by the force duty officer, the FDO?
 11 A. That's correct.
 12 Q. Does it follow that in your role as an FTA, from 2009,
 13 you became familiar with the role of an FDO?
 14 A. Yes, absolutely.
 15 Q. And what, would commonly have to work together with
 16 an FDO?
 17 A. Because of my role as a firearms instructor, not quite
 18 so much but certainly I'm aware of the FDO role and how
 19 the firearms TAC adviser and the FDO interact without
 20 a doubt.
 21 Q. As I am sure you will appreciate, we're going to be
 22 coming on to look at your role in devising
 23 Operation Plato and the MTFA plans and I'm certain that
 24 you'll be aware that we are particularly interested to
 25 understand the role that an FDO has --

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1 A. Yes.
 2 Q. -- when Operation Plato is called.
 3 A. Absolutely.
 4 Q. And even more particularly, with the risk that that
 5 person will become overwhelmed by the extent of the
 6 duties on them.
 7 A. Yes.
 8 Q. And I believe therefore, based upon your experience from
 9 2009, you are well placed to express a view about those
 10 matters.
 11 A. Yes. Absolutely, sir, and also I am, or I was, an
 12 occupationally competent tactical firearms commander.
 13 Q. We'll look forward in a short time to receiving your
 14 views about those matters. I'm now at paragraph 9 of
 15 your statement. Where we'd left you is in May 2009 when
 16 you went on attachment to Tameside Division. Following
 17 that 8-month attachment, where were you posted?
 18 A. I returned back to the Firearms Training Unit, sir.
 19 Q. Did you resume your duties as a national firearms
 20 instructor?
 21 A. I did, yes.
 22 Q. In May 2010, were you promoted to the rank of sergeant?
 23 A. Yes, I was.
 24 Q. And soon afterwards what did you become?
 25 A. I became the chief firearms instructor.

1 Q. Within Greater Manchester Police is the role of chief
 2 firearms instructor rank-specific so that for example it
 3 has to a sergeant?
 4 A. No, not at all, sir. The role of the chief firearms
 5 instructor is actually role-specific rather than
 6 rank-specific, but the College of Policing do state that
 7 the chief firearms instructor should be the
 8 highest-ranking person that holds the relevant skills to
 9 perform that task.
 10 Q. Did you hold the position of chief firearms instructor
 11 in GMP for 6 months?
 12 A. Yes, I did.
 13 Q. And thereafter what happened?
 14 A. During that 6 months, my deputy chief firearms
 15 instructor was Inspector Marcus Williams, who was the
 16 head of firearms training, as a result of the role not
 17 being rank-specific. This is whilst we ensured that
 18 inspector Williams had achieved all of the required
 19 learning to perform the function and at that point
 20 Inspector Williams became the chief firearms instructor
 21 and I became the deputy chief firearms instructor.
 22 Q. During your time as a firearms instructor in GMP, did
 23 you attend various training courses?
 24 A. I did, yes.
 25 Q. Did that involving qualifying, as I believe you have

1 told us, as an occupationally competent cadre TFC?
 2 A. It did.
 3 Q. What did that mean, please?
 4 A. The course itself trains people to become a tactical
 5 firearms commander within their intended function, so an
 6 initial tactical firearms commander will attend a
 7 one-week course, a cadre tactical firearms commander
 8 will attend a two-week course. At the end of that
 9 course, if they have achieved all of the relevant
 10 learning outcomes and they are deemed competent, they
 11 will leave that course occupationally competent. They
 12 will then go through a period of shadowing and
 13 mentoring, producing a portfolio of evidence which will
 14 be then considered by the firearms lead, and they would
 15 be signed off as operationally competent. My role was
 16 purely occupationally competent and it was intended that
 17 I would understand all of the relevant requirements so
 18 that I could then take part in command training in the
 19 future.
 20 Q. And indeed thereafter did you become part of a team of
 21 officers within not just GMP but the north-west more
 22 generally, which regularly delivered national accredited
 23 ITFC and cadre TFC courses?
 24 A. I did, sir, yes.
 25 Q. During 2013 were you temporarily promoted?

1 A. I was, sir, yes, to the rank of inspector.
 2 Q. At that stage what role did you take up?
 3 A. At that time I became the head of firearms training and
 4 the firearms training manager.
 5 Q. Within GMP?
 6 A. That's correct, yes.
 7 Q. Did that follow GMP joining something that we're going
 8 to become familiar with called the North-west Armed
 9 Policing Collaboration?
 10 A. It did, sir, yes.
 11 Q. I'll say that again because it's going to crop up again
 12 and again: the North-west Armed Policing Collaboration
 13 or the NWAPC.
 14 A. That's correct.
 15 Q. Was the NWAPC a collaboration of the six forces within
 16 the north-west of England?
 17 A. Yes, it was.
 18 Q. Those being Greater Manchester Police?
 19 A. Yes.
 20 Q. Lancashire Police?
 21 A. Yes.
 22 Q. Merseyside Police?
 23 A. Yes.
 24 Q. Cheshire Police?
 25 A. Yes.

1 Q. North Wales Police?
 2 A. Yes. Although the Cheshire and North Wales, they were
 3 an alliance .
 4 Q. I was going to say North Wales and Cumbria Police as
 5 well .
 6 A. Yes, that's correct .
 7 Q. As part of the NWAPC, what was the arrangement for
 8 a chief firearms instructor?
 9 A. It removed the requirement of a chief firearms
 10 instructor in each force and then what was implemented
 11 at that point was one chief firearms instructor who
 12 covered all of the forces within the north–west armed
 13 policing region and all of the forces then had
 14 a firearms training manager who came under the direction
 15 of the chief firearms instructor .
 16 Q. So I believe we're going to hear from Inspector Lear
 17 tomorrow that the NWAPC came into existence in 2012.
 18 A. Yes.
 19 Q. So from that time, have I understood correctly, there
 20 would be a chief firearms instructor in the NWAPC?
 21 A. Yes.
 22 Q. And beneath that person, each individual force, each of
 23 the six, would have its own chief firearms instructor?
 24 A. Would have their own firearms training manager.
 25 Q. Thank you. And at the time that we're dealing with, so

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1 the time from 2013 when you were promoted, who was the
 2 CFI, chief firearms instructor, for the north–west
 3 region?
 4 A. Inspector Ponton.
 5 Q. Which force was he from?
 6 A. From Cheshire.
 7 Q. In 2015, did you temporarily step down from your role as
 8 firearms training manager for reasons connected with
 9 your health?
 10 A. I did. I required emergency surgery, so I stood down
 11 from that role at that point.
 12 Q. And did Inspector Simon Lear, to whom I have just
 13 referred, take over your role as head of firearms
 14 training?
 15 A. He did.
 16 Q. And did Sergeant Sean Johnson take over the role of
 17 firearms training manager?
 18 A. He did, yes.
 19 Q. I'm just going to pause for a moment before we continue
 20 with your statement to seek your views about some of the
 21 things that we expect to be told by Inspector Lear.
 22 Let me first of all give some background. By 2015,
 23 you had been involved in firearms training within
 24 Greater Manchester Police for many years had you not?
 25 A. I had, sir .

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1 Q. And I have no doubt therefore that you will be very well
 2 aware, as is publicly known, that in June of 2008,
 3 Police Constable Ian Terry was tragically shot and
 4 killed during a firearms training incident with GMP.
 5 A. Yes, sir .
 6 Q. And that, as you will know, led to an inquest,
 7 of course.
 8 A. It did.
 9 Q. At which it was concluded that Constable Terry had been
 10 unlawfully killed .
 11 A. Yes.
 12 Q. And in due course, that was to lead to a prosecution of
 13 GMP for an offence under the Health and Safety at Work
 14 et cetera Act and misconduct proceedings?
 15 A. It did, sir .
 16 Q. Did those events lead to change within the firearms
 17 community in GMP?
 18 A. Yes, it did, yes.
 19 Q. And again, if you're able to at this stage, in a few
 20 sentences, describe when you perceived those changes as
 21 having started and then explain what those changes were.
 22 A. The changes were very, very far reaching, sir . They
 23 were supported by the College of Policing, who regularly
 24 attended and provided us with guidance and action plans
 25 for us to achieve better systems and risk assessment

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1 systems to ensure that safe people are delivering safe
 2 training at safe locations.
 3 Q. I indicated that I was going to ask you about a few
 4 short passages in the statement of Inspector Lear. For
 5 the record, I'm going to be asking you about
 6 Inspector Lear's first statement, it's dated
 7 6 July 2020, and the INQ reference is {INQ034419/1}.
 8 Mr Lopez, I'm going to ask you to get ready to show
 9 the first page of that statement on the screen but not
 10 to do so for just one moment.
 11 Inspector Lear was a colleague of yours in the
 12 Greater Manchester Police?
 13 A. Yes, that's correct .
 14 Q. And he was to become your line manager in the Firearms
 15 Training Unit, as we'll hear in a moment, in 2015?
 16 A. Yes.
 17 Q. And am I right that you therefore worked closely with
 18 him for a period of time?
 19 A. Yes.
 20 Q. Indeed, as we heard from a witness the week before last,
 21 maybe even the week before that, you attended in
 22 May 2017 training with him on the refreshed CTPHQ Plato
 23 training?
 24 A. I did.
 25 Q. That was rather a mouthful. What we have understood is

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1 in 2012 ACPO TAM established some national guidance for
 2 Plato. That was then refreshed in 2017.
 3 A. Yes.
 4 Q. Training was offered in it?
 5 A. Yes.
 6 Q. And you attended that training together with
 7 Inspector Lear, did you not?
 8 A. Yes.
 9 Q. Mr Lopez, could we now put on the screen the first page
 10 of Mr Lear's statement, please?
 11 I'm going to read out what he states at paragraph 2
 12 and then ask you whether you agree and, if you do, what
 13 the impact of it was:
 14 "In February 2012 I returned to the firearms unit as
 15 an inspector with responsibility for a firearms team.
 16 Upon my arrival at the unit there were initially
 17 eight inspectors, but with budgetary cuts, over the next
 18 couple of years, this reduced to five and then to three.
 19 With those reductions, my responsibilities increased,
 20 first with the assumption of the Policy and Compliance
 21 Unit (PCU) in 2014 and then the firearms training school
 22 in 2015."
 23 So first question: do you agree that, from about
 24 2012, the number of inspectors on the firearms unit
 25 reduced first by three to five and then by two to three?

1 A. I couldn't be specific on numbers, but certainly I'm
 2 aware of cuts, sir, yes.
 3 Q. From eight to three seems like a big reduction. Did it
 4 feel like a big reduction to you at the time?
 5 A. Yes, definitely.
 6 Q. What was the impact of such a substantial reduction
 7 in the staffing on the firearms unit?
 8 A. It was the same as it was across the whole police
 9 service, really. Everybody gained more duties. Where
 10 it used to be that two people would do two jobs, now one
 11 person was doing two jobs. It was just the cuts that
 12 were required to save money that everybody felt.
 13 Q. And obviously those cuts weren't your responsibility.
 14 But from what you've said so far it would seem on the
 15 one hand there was an expectation that there would be
 16 changes and improvements within the firearms community
 17 in Greater Manchester Police, whereas on the other hand
 18 the firearms unit was being cut substantially in
 19 numbers.
 20 A. Yes, absolutely. Initially, there was a great deal of
 21 focus on that and a great deal of resources given to it,
 22 and then as time went on and things were put in place,
 23 then those resources were diverted.
 24 Q. We're going to come on to look at two particular issues
 25 with you: (1), Plato plans within GMP and, secondly,

1 training on those plans. Do you feel that the budgetary
 2 cuts that we've just identified had an impact upon your
 3 ability to keep on top of policies and/or on your
 4 ability to ensure there was training upon those plans
 5 and policies?
 6 A. I don't think me personally, sir, no. I only came to
 7 the Policy Compliance Unit in -- I think it was early
 8 2016, so I wasn't aware of any impact to me personally
 9 at that point.
 10 Q. I'm next going to ask you about another passage in the
 11 statement of Inspector Lear, and again it really is just
 12 to do two things: first of all, to ensure you agree with
 13 it and, secondly, because it will provide some context
 14 when we move on to other aspects of your evidence.
 15 Could we go to the same INQ reference,
 16 {INQ034419/3}, please. I do hope Inspector Lear
 17 will not mind that we're borrowing bits of his evidence,
 18 even though he's giving evidence himself tomorrow.
 19 The top half of that page, please, Mr Lopez.
 20 Paragraph 9:
 21 "It may at this point be useful to explain the
 22 relationship between the North-west Armed Policing
 23 Collaboration (NWAPC) and Greater Manchester Police
 24 in relation to firearms. The NWAPC was formed,
 25 I believe, in 2013/2014."

1 In fact he corrects that in a subsequent statement,
 2 it was 2012:
 3 "It was and still is a training collaboration only."
 4 Would you agree with that, that the NWAPC was
 5 a training collaboration?
 6 A. Yes, I certainly would. That obviously had an impact
 7 tactically, but certainly it was a training
 8 collaboration, yes.
 9 Q. Paragraph 11:
 10 "With the creation of the collaboration, the
 11 decision was made that the NWAPC would be responsible
 12 for training standard operating procedures (SOPs) and
 13 home forces would retain responsibility for operational
 14 matters."
 15 Again, would you agree with that?
 16 A. Yes.
 17 Q. "When operational policies had the potential to
 18 influence multiple forces, for example post incident,
 19 Operation Plato and the armouries, then an overarching
 20 regional policy would be created with forces expected to
 21 have their own detailed individual plans."
 22 Do you agree?
 23 A. Yes.
 24 Q. "There were very few NWAPC policies which directly
 25 influenced operational policing, but when there were,

1 they were very generic and were almost an outline of
 2 principle whereas individual force policies contained
 3 more detail about how an incident should be dealt with."
 4 A. Yes.
 5 Q. Do you agree?
 6 A. I do.
 7 Q. I just want to go over some of that because it's going
 8 to be important in terms of trying to understand the
 9 plans and policies that were in place because I think
 10 you will be the first to agree that when you provided
 11 your first statement, and I genuinely intend no
 12 criticism at all of you, but when you provided your
 13 first statement there was a degree of confusion --
 14 A. Yes.
 15 Q. -- in your own mind about which policies were in place
 16 and which plans were in place at which particular times.
 17 A. That's correct, yes.
 18 Q. We can take that from the screen now, Mr Lopez.
 19 That's because there have been various policies,
 20 some internal to GMP, some regional, at different points
 21 in time?
 22 A. Yes, that's correct.
 23 Q. Let's just make sure we understand the scheme before we
 24 descend into the detail. Where I think we were from
 25 2012 -- and this is the period that interests us because

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1 that's the period from which we have the ACPO TAM
 2 guidance -- from 2012 we have different layers at which
 3 plans and policies can be created; is that right?
 4 A. Yes.
 5 Q. So at the top, in an overarching position, as
 6 Inspector Lear has put it, we have the North-west APC
 7 providing plans in relation to issues that may apply
 8 across the six forces that are members?
 9 A. Yes.
 10 Q. And then beneath that we might even have a sub-plan
 11 provided by the NWAPC; am I right?
 12 A. Yes.
 13 Q. And then beneath, if that is the right way of putting
 14 it, those two layers we would expect to see an
 15 operational plan which is individual to GMP?
 16 A. Yes, that's correct, sir.
 17 Q. And just to develop that further in the hope that what
 18 is not a straightforward situation is going to make more
 19 sense once you and I discuss it, when we start looking
 20 at Operation Plato, in the period before 4 May 2017,
 21 an important date for reasons you and I understand and
 22 which will be explained in due course, before that date
 23 we did have those three layers of plan, did we not?
 24 A. Yes, we did, sir.
 25 Q. So what we had at the top, before May 2014, was the

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1 NWAPC collaboration plan?
 2 A. Yes, we did, sir.
 3 Q. As I've understood it, and tell me if I've got this
 4 wrong, what that dealt with were the circumstances in
 5 which armed resources from one force might be used in
 6 another force?
 7 A. That's correct, yes.
 8 Q. So this sharing of armed responses?
 9 A. It is.
 10 Q. And that top layer, that dealt not just with -- that top
 11 layer plan dealt not just with MTFAs but any kind of
 12 situation in which armed responses might need to be
 13 shared?
 14 A. Exactly, yes. It dealt with whenever it was felt that
 15 a neighbouring force's resources could achieve the
 16 working strategy and neutralise any perceived threat
 17 faster than that force's own resources.
 18 Q. So it might be an MTFAs type situation or it might be
 19 another situation, for example a Dale Cregan type
 20 situation?
 21 A. It could be anything.
 22 Q. You must tell me if this isn't making sense, but at the
 23 top level we have an overall plan that deals with many
 24 different times of firearm situations. What we have
 25 beneath that in the period before 4 May 2017 is another

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1 NWAPC plan, which dealt specifically with MTFAs?
 2 A. It did.
 3 Q. So that was dealing with a situation in which resources
 4 from one force might need to be deployed into another
 5 force, for example GMP?
 6 A. Yes, that's correct.
 7 Q. So we can spot these when we come to them, the top layer
 8 is a plan which has the version number 1.4.
 9 A. It does.
 10 Q. The plan just beneath it was called annex C, was it not?
 11 A. It was, sir.
 12 Q. And in May 2017 was version 1.10?
 13 A. Yes.
 14 Q. Then at an operational level within GMP, up to
 15 4 May 2017, so this is layer 3, we have what was called
 16 SOP or standard operating principle 47, did we not?
 17 A. That's correct, sir, yes.
 18 Q. And the version of that in force at that time was
 19 version 5?
 20 A. Yes.
 21 Q. I'm sure to those watching, including the people that we
 22 happily have back in the hearing room now, this all
 23 seems confusing at the moment.
 24 SIR JOHN SAUNDERS: That's not entirely your fault,
 25 Mr Greaney.

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1 MR GREANEY: Or some might say at all my fault, sir!
 2 At the very top we have the NWAPC overall plan
 3 version 1.4. Beneath that we have the NWAPC annex C
 4 dealing with MTFAs, version 1.10, and underneath that
 5 we have the GMP SOP 47, version 5?
 6 A. Yes.
 7 Q. I will ask you at this stage, although I dare say we'll
 8 come back to it, having plans is obviously important, is
 9 it not?
 10 A. Most certainly, sir, yes.
 11 Q. But we don't have plans for the sake of it, do we?
 12 A. No.
 13 Q. We have plans so that if what is described in the plan
 14 occurs or eventuates, people know what to do?
 15 A. Yes.
 16 Q. What was the purpose of these three plans which all
 17 dealt with the same or were capable of dealing with the
 18 same situation?
 19 A. They actually dealt with specific areas of a very
 20 similar subject, which is where the confusion creeps in,
 21 I think. So the cross-boundary agreement was obviously
 22 agreed through all the North-west Armed Policing
 23 Collaboration forces, which would allow the use of
 24 North-west Armed Policing Collaboration resources to
 25 cross borders to achieve a commander's working strategy.

1 And then there were certain criteria within that as to
 2 when that would be deemed appropriate not to send your
 3 forces and when certainly you would and, obviously,
 4 other protocols around command, the mutual command of
 5 people and what we then needed to do, such as informing
 6 the strategic firearms commander that it was occurring.
 7 The annex or appendix C, that dealt specifically
 8 with the agreed cross-boundary protocol in relation to
 9 an MTFA. So this wasn't a document that was overarching
 10 and dealt with absolutely everything in relation to how
 11 a commander should respond, this was purely around the
 12 firearms resources. So for instance it didn't include
 13 JESIP partners and what should occur within that. This
 14 was purely the agreement around how firearms resources
 15 would respond, which is my understanding.
 16 Q. And mine too.
 17 A. SOP 47, that was a force-specific document, which then
 18 gave a list of other documents that a commander should
 19 be aware of, including JESIP, which would then tie the
 20 whole thing together.
 21 Q. I do understand what these plans dealt with and I hope
 22 that earlier I had summarised them accurately. But as
 23 you will appreciate, I have spent literally hours poring
 24 over these and their various iterations.
 25 And the plans, do they not, refer to other

1 documents? So for example, SOP 47 refers to the JOPs.
 2 A. It does.
 3 Q. And what I'm wondering, and what others might be
 4 wondering, is -- let's imagine I'm Mr Sexton and I'm the
 5 FDO in the force control room when the call comes
 6 through that there has been a bomb at the
 7 Manchester Arena. What am I expected to do?
 8 Am I expected to get three separate plans up on my
 9 computer screen and cross-refer to other documents
 10 before I decide what to do or should the content of them
 11 have been embedded and if so how?
 12 A. No, you shouldn't have to get those plans out, sir. In
 13 fact it would be impossible to do that because the
 14 documents are far too big and there are far too many of
 15 the documents to take into account. So in effect what
 16 those documents do is give the reader the -- they
 17 signpost them to what they need to be aware of. In
 18 effect they would need to have a working knowledge of
 19 JESIP, they would need to have a working knowledge of
 20 the cross-boundary appendix C so that they could then
 21 apply that. What I think -- quite commonly, I think,
 22 commanders created their own, for want of a better way
 23 of describing it, crib sheet that they would use as
 24 their own method of going through all these things. So
 25 through training throughout the year, attending

1 commander training and attending MTFA training, they
 2 would create their own crib sheets.
 3 Q. Let me make sure I've understood this. It is obviously
 4 futile to expect the FDO, when such a call comes in, to
 5 refer to the various plans which exist?
 6 A. I would think it would be impossible, sir.
 7 Q. They're going to waste an hour before they get anywhere
 8 near what they have to do --
 9 A. Yes.
 10 Q. -- if not more? So what you're anticipating is
 11 a situation in which the information within each of
 12 those three plans has embedded itself within the FDO; is
 13 that right?
 14 A. Yes, you have created your own crib sheet. I had mine,
 15 I had my own -- when I commanded training exercises,
 16 I had my own Operation Plato crib sheet which I went
 17 through.
 18 Q. What was in place either within the firearms unit or
 19 elsewhere within GMP to make sure that happened?
 20 A. At that time I don't believe there was anything, sir.
 21 I think it was left to commanders to create their own.
 22 And certainly when I did create my further one,
 23 I intended that they would use that as like a basis and
 24 alter it as they intended.
 25 Q. And certainly I'm not going to suggest that when you

1 created your Plato policy , and that was done on
 2 4 May 2017, so there's that important date, that you
 3 weren't trying to produce something that would be
 4 helpful?
 5 A. Yes, absolutely, I was trying to tie everything together
 6 to rid them of this tome of information that they needed
 7 to try and digest. I was trying to create a very
 8 specific understanding of what they needed to do and
 9 then create them a checklist which they could then alter
 10 themselves to use as they wished.
 11 Q. And as we're going to see when we look at your
 12 document -- I appreciate I've got it in mind and you do
 13 too, others may not do -- you provided a list of the
 14 duties of the FDO, did you not?
 15 A. Yes.
 16 Q. And it was a very extensive list?
 17 A. It was, it was.
 18 Q. No doubt we'll hear evidence from others about training
 19 and so on, but so far as you recall it, the expectation
 20 was that individual officers who might perform the role
 21 of FDO, they were expected to acquaint themselves with
 22 what their responsibilities were?
 23 A. Yes, absolutely, and then they would pass those
 24 responsibilities on to other people, so they would carve
 25 up that plan and give responsibilities to other people.

1 Q. In May 2017, and I'm talking about the position before
 2 the arena attack, did you hold a view about the role of
 3 FDO based upon your experience?
 4 A. I did, sir, yes. My view of it was that it was
 5 absolutely an impossible task. I could see from the
 6 exercising that we conducted -- and that's based on
 7 very, very limited information feeds, you're not getting
 8 the huge amount of phone calls that I undoubtedly expect
 9 they would have received that night, which is -- it's
 10 almost impossible to test and train for that eventuality
 11 because it's just going to happen on the night and
 12 that's the only time you're ever going to be aware of
 13 it.
 14 Q. I don't really want to put words in your mouth, so you
 15 use your own words if these aren't the right ones, but
 16 before the arena attack was it obvious to you that if
 17 there was going to be a failure of police in responding
 18 to such an incident, as occurred, that that point of
 19 failure was likely to be the FDO?
 20 A. Yes, that was my belief, sir, and it's written in most
 21 of the learning that we receive, that it is an
 22 extraordinary event and the likelihood is that the FDO
 23 is going to be under an extreme amount of pressure.
 24 Q. And not just an extreme amount of pressure, too much
 25 pressure?

1 A. Far too much. It would -- I fully expect it would be
 2 almost like being hit by a tidal wave: there's nothing
 3 you can do to get out of the way, it's on you, there's
 4 nothing you can do.
 5 Q. I said we were going to pause for a moment, and it took
 6 a bit longer than a moment, to seek your views on some
 7 of what Inspector Lear says --
 8 SIR JOHN SAUNDERS: Just before you move on, if you don't
 9 mind, I think we all do understand, so I am grateful for
 10 all the work that has gone into simplifying that. But
 11 I think we will hear that the FDO on the night had
 12 prepared his own crib sheet.
 13 MR GREANEY: We will.
 14 SIR JOHN SAUNDERS: So you aren't the only person who did
 15 it. To me, see what you think, the idea of everyone
 16 preparing their own crib sheet, they may get it wrong,
 17 they may differ in how they're doing it. Why didn't
 18 someone do this job and then have it authorised and
 19 looked at and checked so you all had a similar document
 20 to work from?
 21 A. That is in effect what I did, sir, but prior to that it
 22 was down to the individual commanders and when I did
 23 create mine, the document on 4 May, I fully expected
 24 that commanders would alter it and make it their own,
 25 just because people have different ways of working, so

1 the way people work, although it's structured, they
 2 would have different methods of laying that out --
 3 SIR JOHN SAUNDERS: You have put notes on it for yourself,
 4 but actually the structure ought to be the same for
 5 everybody?
 6 A. It would be, sir. The order in which things need to
 7 occur is still correct, but the way it's laid out, so
 8 capital letters, bullet points, highlights, that kind of
 9 thing, I expected that they would all alter that.
 10 SIR JOHN SAUNDERS: But the idea of having a crib sheet
 11 which was prepared for FDOs and therefore uniform across
 12 the -- that didn't come from GMP institutionally, it
 13 came from you saying: I think it's a good idea if I do
 14 it.
 15 A. I think it came from national learning, actually, sir,
 16 that we should have drop-down menus. That was an aspect
 17 of that.
 18 SIR JOHN SAUNDERS: Thank you.
 19 MR GREANEY: Yes. We're going to learn that when you did
 20 your document in May 2017, that was driven by the
 21 refreshed CTPHQ guidance on Plato.
 22 A. It was.
 23 Q. I'm just going to finish off the position in relation to
 24 your background and experience, having welcomed your
 25 views on those matters, and then we'll turn to look at

1 some of the plans, although certainly not all of the
 2 plans, in a little more detail.
 3 I'm now back at page 4, paragraph 13, of your third
 4 witness statement. As you've explained to us, you
 5 required surgery in 2015, but in November of that year
 6 did you return to work in the Firearms Training Unit on
 7 restricted duties, assisting Inspector Lear?
 8 A. I did, yes.
 9 Q. And in what respects were you assisting him?
 10 A. I assisted on the delivery of command training. I did
 11 a lot of work around post-incident management and
 12 obviously I rewrote the MTFA plan.
 13 Q. In your statement at paragraph 14 you make plain that
 14 within your firearms career you've been involved in many
 15 Operation Plato exercises within Greater Manchester
 16 Police --
 17 A. Yes.
 18 Q. -- both as an operational firearms officer, a command
 19 assessor and an umpire?
 20 A. Yes.
 21 Q. And that you've also been involved on national exercises
 22 as a command assessor?
 23 A. Yes, that's correct.
 24 Q. Have those exercises been, at least some of them,
 25 multi-agency exercises involving the Fire and Rescue

1 Service of Greater Manchester?
 2 A. Yes.
 3 Q. The North West Ambulance Service?
 4 A. Yes.
 5 Q. And we won't identify who, but other organisations as
 6 well?
 7 A. Yes, that's correct.
 8 Q. Your statement doesn't deal with this, but were you
 9 involved in any capacity in Exercise Winchester Accord?
 10 A. I don't recall being involved in Winchester Accord or
 11 certainly not with the commander. I don't know, sir.
 12 Q. Have you heard of Winchester Accord?
 13 A. I certainly have, yes, absolutely.
 14 Q. Whilst you were a police officer, and indeed before the
 15 arena attack, had you heard of Winchester Accord?
 16 A. Yes, I had.
 17 Q. And before you prepared your 4 May 2017 GMP operational
 18 plan for Plato, had you been informed that Exercise
 19 Winchester Accord had revealed problems?
 20 A. I don't recall being specifically told that through
 21 systems. I do believe that I discussed this with
 22 Mr Gaskell when we arranged some training in January
 23 around the --
 24 Q. We're going to come on to that training. This is
 25 Mr Gaskell of the Fire and Rescue Service?

1 A. It is, yes.
 2 Q. But so far as you recall, and I do understand I'm asking
 3 you to cast your mind back, you don't remember anyone
 4 specifically saying to you: you have this role in the
 5 firearms unit, you need to be aware that when we trained
 6 on Exercise Winchester Accord it revealed, (1), the FDO
 7 was overburdened and, (2), there were problems with
 8 interoperability?
 9 A. No, I don't recall that specifically, no.
 10 Q. In your witness statement, Mr Whittle, you deal next
 11 with the training that in fact you have just mentioned
 12 that you delivered in 2017. We'll come to that,
 13 probably after lunch, I expect. So what I want to do
 14 before that is to deal with the MTFA plans that were in
 15 force in GMP between 2012 and 2017, albeit that we've
 16 sought to deal with it in high-level summary already.
 17 I'm going to ask you, please, to go to page 11,
 18 paragraph 51. The document I have referred to already,
 19 the ACPO TAM contingency plan for MTFAs, I'll give it
 20 the reference, although we won't need it on the screen.
 21 {INQ013767/11}. I believe it's the position that you
 22 were, during the course of your duties, aware of that
 23 first iteration of the national plan and that you
 24 understood its contents?
 25 A. Yes, I was.

1 Q. But that you had no involvement in drafting or
 2 developing it?
 3 A. No.
 4 Q. And it was introduced at the stage of your career when
 5 you were still in the Firearms Training Unit rather than
 6 in policy development?
 7 A. Yes, that's correct.
 8 Q. And your involvement with that ACPO TAM document was
 9 really doing a lot of work in training officers in light
 10 of the document?
 11 A. Yes.
 12 Q. But initially at least you were not involved in
 13 developing GMP plans on the basis of it?
 14 A. No.
 15 Q. I don't know to what extent you're aware of the evidence
 16 we've received from others, such as Mr Richard Thomas,
 17 on this issue.
 18 A. I don't believe I am, sir.
 19 Q. Not to worry. What I know and others know is that we
 20 looked at that particular policy with Richard Thomas of
 21 CTPHQ and we observed, for example -- we don't need it
 22 on the screen -- at paragraph 2.4 and elsewhere within
 23 the document there is reference to working with other
 24 emergency services.
 25 A. Yes.

1 Q. Were you aware, and indeed was it your view, that in an
2 Operation Plato type situation, working in coordination
3 with other emergency services was important?
4 A. Yes, most certainly.
5 Q. In terms of GMP—specific documents, we've touched upon
6 already the SOP 47. Is it the position that there were,
7 across a number of years, a number of iterations of the
8 GMP policy SOP 47?
9 A. Yes, that's correct.
10 Q. Have you, no doubt with the assistance of GMP, been able
11 to identify which version was in force at which
12 particular point in time?
13 A. Yes, I have.
14 Q. In your first statement, and we don't need to go over
15 this in any detail, through no fault of yours, you had
16 thought that version 2 was in force prior to 4 May.
17 A. Yes, that's correct.
18 Q. In fact you have been able to establish that it wasn't
19 and it was version 5?
20 A. Yes, that's correct.
21 Q. I'm now at page 12 of the witness statement.
22 Let's trace the history of SOP 47 and then look at
23 the version 5. First of all, version 1. I'll give it
24 the INQ reference for the transcript, {INQ031217/1}.
25 The date of the first version of that SOP, 25 July 2012.

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1 A. Yes.
2 Q. It seems obvious, but you will correct me if I'm wrong,
3 that that was triggered by the ACPO TAM guidance that
4 we've mentioned just a few moments ago?
5 A. Yes.
6 Q. Were you involved in any way in drafting that document?
7 A. No.
8 Q. That much perhaps is obvious because it pre-dated your
9 involvement in that particular area of work.
10 A. It did, sir.
11 Q. Were you able to establish that that was written by an
12 inspector called Inspector Fitton?
13 A. It was.
14 Q. Where within GMP did he work?
15 A. He worked in the Policy and Compliance Unit.
16 Q. That was then superseded by version 2 —
17 A. Yes.
18 Q. — 5 months later, dated 24 December 2012,
19 {INQ031286/1}. Again, is it the position that you had
20 no involvement in drafting that document?
21 A. That's correct, sir.
22 Q. But you have been able to establish that it was created
23 in the sense of being updated by Inspector Nutter?
24 A. Yes, that's correct.
25 Q. And that, sir, as you may recall, is a name that we are

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1 familiar with. You'll know that he was involved at
2 a national level with CTPHQ in preparing the refreshed
3 Plato guidance in 2017.
4 Version 3 came along in April 2013, it would seem.
5 A. Yes.
6 Q. And you're aware, I believe, that version 3 has not been
7 located by Inspector Lear or anyone else that has looked
8 for it?
9 A. Yes, that's correct.
10 Q. But what has been established is that it was created
11 in the sense of being updated by Inspector June Roby?
12 A. Yes.
13 Q. And again you had no involvement in that particular
14 document. Inspector Roby, now retired, is a witness
15 who'll be giving evidence on Wednesday, so she can be
16 asked about that missing version.
17 We then come to version 4, dated October 2014.
18 {INQ040146/1}.
19 Were you involved in the creation of that iteration?
20 A. No, I wasn't, sir.
21 Q. But have you been able to establish that that version
22 was created, in the sense of being updated, by
23 Sergeant Wright?
24 A. Yes, that's correct.
25 Q. Finally, so far as SOP 47 is concerned, we get to

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1 version 5, do we not?
2 A. Yes.
3 Q. Which is dated 5 October 2016?
4 A. Yes.
5 Q. So 7 months before the arena attack. And it has the INQ
6 reference {INQ039970/1}.
7 A. Yes.
8 Q. Again, did you have any involvement in drafting that
9 particular document?
10 A. No.
11 Q. But have you been able to establish that it was updated
12 by Superintendent Giladi —
13 A. Yes.
14 Q. — in, as I've said, October 2016?
15 A. Yes.
16 Q. And is it the position, as you understand it, that that
17 iteration of SOP 47 was created for the purposes of the
18 work that was being done by HMICFRS?
19 A. Yes, it was.
20 Q. And indeed we know that that's the version that was
21 provided to HMICFRS when they did their work.
22 That you can now agree was the version that was in
23 force prior to 4 May 2017?
24 A. Yes, that's correct.
25 Q. Let me be absolutely clear about it: we have

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1 established, or rather you have established and GMP has
 2 established, that prior to 4 May 2017, the lowest layer
 3 of plan, by which I mean the internal operational plan
 4 of GMP that was in force, was SOP 47, v5?
 5 A. Yes, that's correct.
 6 Q. So although at one stage it appeared that there was
 7 a disagreement between you and Inspector Lear about the
 8 internal policy that was in force, the two of you are
 9 now in full agreement?
 10 A. Yes, absolutely.
 11 Q. We should look at version 5. It's {INQ039970/1}.
 12 Can I ask you, just before we look at some specific
 13 parts of this, in May of 2017, when you were
 14 commissioned to do your work on this issue, do you think
 15 that you were aware that that was the operational plan
 16 that was in force?
 17 A. Yes.
 18 Q. So insofar as any confusion developed about whether it
 19 was version 2 or version 5 that was in force, that's
 20 a confusion that developed subsequently and at the time
 21 you were clear about the position?
 22 A. Yes, absolutely.
 23 Q. We can see at the bottom of the first page the original
 24 author of this SOP is given, Inspector Fitton, and the
 25 reviewing officer, Superintendent Giladi.

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1 A. Yes.
 2 Q. What was the role of Superintendent Giladi in relation
 3 to firearms?
 4 A. He was the firearms lead, so he was the head of
 5 specialist operations. He would come under the ACC
 6 firearms lead.
 7 Q. Over the page, {INQ039970/2} --
 8 SIR JOHN SAUNDERS: The warning at the front of that
 9 document, that this is a sensitive document, no longer
 10 applies, presumably?
 11 MR GREANEY: No, because this is a historical document which
 12 has been superseded.
 13 SIR JOHN SAUNDERS: That's fine, I was just checking.
 14 MR GREANEY: You're quite right, sir. There are some parts
 15 of this that remain irrelevant and sensitive or
 16 operationally sensitive. Those are marked within the
 17 document itself. This has been through, as everything
 18 has been, a most careful assessment for sensitivity and
 19 we're not going to look at every word or anything like
 20 it. As the chairman has just observed, this fell into
 21 history.
 22 {INQ039970/2}, please. We can see the history that
 23 you've just identified, version 1, Inspector Fitton.
 24 A. Yes.
 25 Q. Version 2, Inspector Nutter.

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1 A. Yes.
 2 Q. Version 3, Inspector Roby. Version 4, Sergeant Wright.
 3 And there we are, version 5, Superintendent Giladi.
 4 A. Yes.
 5 Q. Then immediately beneath that is a heading "Reference
 6 documents". This is what I was getting at earlier.
 7 This SOP is not an entirely free-standing document --
 8 A. No.
 9 Q. -- that a person could read and understand all of their
 10 responsibilities as an FDO?
 11 A. No.
 12 Q. The reference documents are identified as, "Responding
 13 to a Marauding Terrorist Firearms Attack Joint Operating
 14 Principles for the Emergency Services (edition 2)"?
 15 A. Yes.
 16 Q. Often referred to as JOPs?
 17 A. That's correct.
 18 Q. And I don't know whether you can recall, but I'm certain
 19 that I will be demonstrated to be correct that in fact
 20 at this time, in October 2016, the relevant version of
 21 the JOPs was not edition 2 but was edition 3.
 22 A. It was, yes.
 23 Q. That had come into force in January of 2016. So that
 24 therefore, can you agree, appears to be an error in
 25 reference?

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1 A. It is.
 2 Q. Another document that the reader is required to or
 3 invited to refer to is "Initial Response to a Marauding
 4 Terrorist Firearms Attack by North-west Regional Force
 5 Firearms Resources (version 7)".
 6 A. Yes.
 7 Q. "National police firearms mobilisation plan
 8 (version 3.1)."
 9 A. Yes.
 10 Q. "Stay Safe at Firearms Incidents"?
 11 A. Yes.
 12 Q. Then another document that is marked irrelevant and
 13 sensitive.
 14 Then "MACP: Spontaneous Incident Guidance Notes for
 15 Police Commanders re Application Process v11"?
 16 A. Yes.
 17 Q. NPCC force leads letter from ACC Chris Shead?
 18 A. Yes.
 19 Q. And an Operation Temperer North-west Region document,
 20 December 2015?
 21 A. Yes.
 22 Q. Is it a fair observation to say that anyone just picking
 23 up this plan has got a lot of work to do by way of
 24 research to understand what might be required of them in
 25 an Operation Plato situation?

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1 A. Most certainly.
 2 Q. It's very far indeed, do you agree, from something we
 3 heard described earlier, namely an action card approach?
 4 A. Oh yes, yes, it's a world away from that, yes.
 5 SIR JOHN SAUNDERS: While we're going on, do they just get
 6 this document or do they get some training around it as
 7 well?
 8 A. They receive training on all the different aspects
 9 around that through the command training, which is
 10 specified by the CFI and also by the College of
 11 Policing.
 12 SIR JOHN SAUNDERS: Thank you.
 13 MR GREANEY: In relation to any particular occasion, any
 14 particular event, should there be a guarantee that the
 15 officer who becomes FDO should have had that training?
 16 A. It would depend at what point they took up that role.
 17 Because obviously the training follows a table, as such.
 18 So for instance, if we did training in 2016, then on the
 19 command training course or the tactical firearms
 20 commander's course, then what we then did was we would
 21 repeat that at the end of the tactical firearms
 22 commander's course because they've obviously missed it.
 23 But you can imagine that if a lesson was on in 2014 then
 24 that probably wouldn't occur because otherwise the
 25 tactical firearms commander's course would be several

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1 weeks long, catching up on all the training they have
 2 missed. Certainly there was a tendency to catch up on
 3 the most recent training they had missed but certainly
 4 not historical.
 5 Q. Let's look at what might be thought to be a problem that
 6 actually does bite upon the events of 22 May 2017. You
 7 prepared or finalised your bottom layer plan, so the GMP
 8 operational plan, on 4 May 2017?
 9 A. Yes.
 10 Q. It went out to firearms commanders, including FDOs, on
 11 12 May 2017?
 12 A. Yes.
 13 Q. By 22 May, had any training been provided to those who
 14 might be FDO upon it?
 15 A. No.
 16 Q. Had any other instruction upon it been given save for
 17 that contained within the document itself and contained
 18 within the email?
 19 A. No.
 20 Q. When would training have been given upon that further
 21 plan that you had prepared?
 22 A. I think it was planned for later in the year and was
 23 actually contained within the body of the text of the
 24 email. I don't recall specifically, but I think it was
 25 around August that year.

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1 Q. I think you're right about that. So we'll come to that
 2 when we look at the email, although that may be tomorrow
 3 with Inspector Lear.
 4 The plan is now here for anyone to look at that
 5 wants to. It would be a waste of time to go through
 6 every single word of it. What I do want to do is invite
 7 your attention to a heading "Force duty officer actions"
 8 because this may well illustrate the point you were
 9 making earlier about the extent to which anyone with
 10 that role, if an event happens in real life is going to
 11 be hit by a big wave.
 12 A. Yes.
 13 Q. Mr Lopez, could we go to {INQ039970/6}. It's the
 14 bottom. Could you enlarge the bottom third of that
 15 page?
 16 The force duty officer actions:
 17 "The actions of the force duty officer in the
 18 initial stages of a marauding terrorist attack are
 19 crucial. The following actions are not exhaustive..."
 20 So this isn't even a list of everything that might
 21 be expected:
 22 "... and the FDO will need strong support from the
 23 OCB team."
 24 A. Yes.
 25 Q. "Some of the actions are likely to be delegated to OCB

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1 supervision."
 2 And then a heading:
 3 "FDO actions include..."
 4 So making plain that this is not an exhaustive list
 5 and then there is a long list of actions required of the
 6 FDO, is there not?
 7 A. Yes.
 8 Q. Some of them being really what might be described as
 9 substantial pieces of work, such as setting the initial
 10 working strategy?
 11 A. Most certainly.
 12 Q. Would it be fair to observe, given what you have said
 13 already, that this is a lot to expect of a single
 14 person?
 15 A. It is.
 16 SIR JOHN SAUNDERS: Can we see the next page? Is that
 17 possible? Just so we get the full extent of it.
 18 {INQ039970/7}.
 19 MR GREANEY: I'm not going to read every line unless you
 20 think it's helpful.
 21 SIR JOHN SAUNDERS: No, no.
 22 MR GREANEY: I think those both in the courtroom and
 23 elsewhere will be able to see that I am not engaging in
 24 hyperbole by suggesting that this is a lot to expect of
 25 a single person.

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1 As I've said already, that version was created by
 2 GMP for HMICFRS for the purposes of the work of the
 3 Inspectorate in preparing what was called
 4 "Counter—terrorism Policing (part 2)". I don't know if
 5 you're aware of that?
 6 A. No, I wasn't, sir.
 7 SIR JOHN SAUNDERS: Mr Greaney, it may be this is not
 8 necessary or helpful, but if we're looking at the bullet
 9 points which are there now before they go, the third
 10 from the bottom, relates to sharing information with BTP
 11 and:
 12 "GMP would retain primacy in any armed response to
 13 attacks at premises within its boundaries."
 14 MR GREANEY: It's worth emphasising that, I respectfully
 15 agree. Mr de la Poer will be pleased we have emphasised
 16 that.
 17 I appreciate that I may be telling you something
 18 that you don't know about, although the fact that you
 19 don't know about it may be important, although I don't
 20 mean that critically of you. I'm telling you this
 21 version was created by the superintendent because
 22 HMICFRS was doing a piece of work looking across
 23 15 forces at how it was approaching counter—terrorism.
 24 One of those forces was GMP and the Inspectorate wanted
 25 to see what plans were in place to deal with an

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1 Operation Plato style attack. So that's background we
 2 all know about and now you know about it as well.
 3 A. Yes.
 4 Q. I can tell you — I hope this isn't going to come as
 5 a surprise — that the Inspectorate had concerns about
 6 this plan. Were you aware of that?
 7 A. No.
 8 Q. We can take it from the screen, Mr Lopez, because we'll
 9 need something else on the screen. I'm going to ask
 10 that we have on the screen just a few paragraphs from
 11 the witness statement of Mr Buchan. Mr Buchan gave
 12 evidence the Monday before last. He was the associate
 13 inspector of HMICFRS, who did work within GMP.
 14 A. Yes.
 15 Q. He has given evidence, but these paragraphs neatly
 16 summarise what he had to say to us.
 17 Could we have on the screen, please, {INQ029796/1},
 18 and I'm going to ask you whether you were aware of these
 19 concerns, and I think you're going to tell me you
 20 weren't, and if you weren't, I am going to be asking you
 21 whether you think you should have been made aware of
 22 these, bearing in mind you were given responsibility for
 23 preparing the plan.
 24 {INQ029796/14}, paragraphs 61 to 64, GMP's
 25 Operation Plato plan. It's a different INQ reference

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1 that's been given, but I can assure you, as we're going
 2 to see from paragraph 62, that what Mr Buchan was
 3 concerned with was the plan that we've just been looking
 4 at, version 5.
 5 A. Okay, sir.
 6 Q. "This evidence was obtained following a document review
 7 of the GMP Plato plan. We found the GMP plan complied
 8 with the 2011 national guidance."
 9 So that's a reference to the ACPO TAM document:
 10 "The plan, locally referred to as 'specialist
 11 operations branch firearms standard operating procedure
 12 47 for marauding terrorist firearms attack
 13 (Operation Plato)' had been regularly reviewed."
 14 Next page, please {INQ029796/15}:
 15 "We examined version 5 that had been updated in
 16 October 2016. The report was very tactical and focused
 17 on the roles, responsibilities and tactics of armed
 18 officers and firearms commanders. There was no mention
 19 in the plan of working with any other agency responding
 20 to the incident, although there were isolated bullet
 21 point references to the Joint Emergency Service
 22 Interoperability Principles. The plan included the Stay
 23 Safe guidance but did not identify how this would be
 24 communicated to those responding to a terrorist attack."
 25 63:

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1 "The role of the force duty officer and potential
 2 issues identified. The GMP Plato plan recognises the
 3 extreme workload that is likely to be experienced by the
 4 force duty officer, in all likelihood the initial
 5 commander of the police response to a terrorist attack.
 6 Despite this, the plan does not detail how the FDO will
 7 be supported during this period of high demand. We
 8 believed that GMP plans placed an over—reliance on the
 9 FDO to complete a significant number of functions in the
 10 early stages of a terrorist attack. GMP needed to
 11 provide more support to the FDO allowing him/her to
 12 focus on commanding the initial response."
 13 And just to complete the picture, Mr Buchan gave
 14 evidence that GMP was briefed about those views held by
 15 the Inspectorate through ACC Hankinson, I think I'm
 16 remembering that correctly, on 4 November 2016.
 17 As we know, on 4 May 2017, you finalised your
 18 Operation Plato plan.
 19 A. Yes.
 20 Q. At any stage before that, were you informed about the
 21 views that had been formed by the Inspectorate?
 22 A. No.
 23 Q. Would it have been rather better if you had been?
 24 A. Most certainly.
 25 SIR JOHN SAUNDERS: I think it might be said it would have

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1 come as no surprise to you as those were already your
 2 views, weren't they?
 3 A. They were, yes.
 4 MR GREANEY: Sir, I think we've been going for a little over
 5 an hour and 15 minutes now. I wonder if we might take
 6 an early lunch.
 7 SIR JOHN SAUNDERS: Yes. 1.30?
 8 MR GREANEY: 1.30 is fine, thank you.
 9 (12.30 pm)
 10 (The lunch adjournment)
 11 (1.30 pm)
 12 MR GREANEY: Mr Whittle, we were dealing, as you'll recall,
 13 with version 5 of the GMP plan, SOP 47.
 14 A. Yes.
 15 Q. I'm just going to park that there for a moment, although
 16 we will come back to that section that we were looking
 17 at.
 18 As we agreed upon earlier, there is a layer at the
 19 bottom, which is the GMP internal operational plan.
 20 A. Yes.
 21 Q. Then we have two levels above that, which are regional
 22 guidance or regional plans, and it's those that I want
 23 to look at next, please. I'm at paragraph 58 of your
 24 witness statement, page 13.
 25 You observe in that paragraph that Inspector Lear

1 has explained in his own witness statement:
 2 "... the different versions of the NWAPC
 3 cross-boundary armed response vehicle (ARV) capability
 4 SOP and the associated appendix C versions would not
 5 have been official GMP policy. Rather, as I have
 6 described above, these were regional documents which
 7 overarched a specific GMP policy. The specific GMP
 8 policies which co-existed alongside these NWAPC policies
 9 would have been SOP 47."
 10 A. Yes.
 11 Q. And you agree with those observations of Inspector Lear?
 12 A. I do. I mean, the way that he's referred to that is
 13 a little confusing. Almost like it's not GMP policy, so
 14 we won't take any notice of it. I think from my point
 15 of view, it's an agreement that the region, including
 16 GMP, have come to regarding cross-boundary operations
 17 and the overarching SOP 47 for -- sorry, I should say
 18 the GMP policy SOP 47 is specifically for MTFA for GMP.
 19 Q. Yes. So the point I think you're making is that the
 20 regional guidance that existed was not irrelevant to
 21 GMP?
 22 A. Yes.
 23 Q. On the contrary, it was relevant?
 24 A. Exactly.
 25 Q. But it dealt with a different or broader issue than

1 SOP 47.
 2 A. It did.
 3 Q. In that it dealt with at different levels the
 4 circumstances in which armed assets from one force might
 5 be deployed into another force area?
 6 A. Yes.
 7 Q. The two layers of regional guidance document, let's just
 8 identify them at this stage. The top layer, so the
 9 layer that is, as we have understood it, dealing with
 10 such a deployment across a variety of situations, that
 11 was described as the cross-boundary ARV capability SOP?
 12 A. Yes.
 13 Q. And the plan or policy in the middle of those three
 14 layers that dealt with the deployment of assets from one
 15 area into another area but in an MTFA situation was
 16 called appendix C?
 17 A. Yes.
 18 Q. There are various iterations of these documents.
 19 I don't consider, sir, that you are going to benefit
 20 from going through them or their history in any detail
 21 and we will go immediately to those which were in force
 22 on 4 May 2017. So this is page 15 where we can see the
 23 cross-boundary ARV capability SOP version 1.4 is
 24 described by you, can we not?
 25 A. Yes.

1 Q. You observe that the date of that document is
 2 25 July 2016?
 3 A. Yes.
 4 Q. Although it was signed off on 3 August by ACC Jacques?
 5 A. Yes.
 6 Q. So that's the top layer. It's version 1.4 and that was
 7 the version that was in force on 4 May when you were
 8 doing your work?
 9 A. Yes, that's correct.
 10 Q. Then immediately beneath that, we see a reference to a
 11 further document and this is the middle layer:
 12 "Initial Response to an MTFA by North-west Region
 13 Force Firearms Unit ARV, appendix C, v1.10."
 14 A. Yes.
 15 Q. And I will give those two documents their INQ
 16 references. The top layer is {INQ034440/1}. The middle
 17 layer, appendix C, is {INQ017233/1}.
 18 What I am going to do is ask that we look at
 19 appendix C, v1.10, because that was a document that was
 20 to be of relevance to your work, was it not?
 21 A. It was.
 22 Q. Could you explain in what way that document was relevant
 23 to your work?
 24 A. That was the document I used as the basis for my rewrite
 25 after receiving the advice to forces on planning for an

1 MTFA from NCTPHQ, which was released in March,
 2 version 1.
 3 Q. So effectively once you were tasked with doing your
 4 plan, you used appendix C, v1.10, as a template; is that
 5 correct?
 6 A. I did, that's correct.
 7 Q. We can go to that version of appendix C. Mr Lopez,
 8 {INQ017233/1}.
 9 What we'll bear in mind is, at the risk of repeating
 10 myself, what we're going to be looking at is the
 11 regional plan that is in place, not dealing with general
 12 firearms situations but dealing with an MTFA.
 13 A. Yes.
 14 Q. So a Plato-type situation?
 15 A. Yes.
 16 Q. We can see, as I said earlier, this is appendix C, the
 17 initial response to a marauding terrorist firearms
 18 attack by north-west region force firearms resources.
 19 A. I don't have that on my screen, unfortunately.
 20 Q. You don't? Is there anything on your screen?
 21 (Pause)
 22 You can now see on the screen that this is
 23 appendix C?
 24 A. Yes.
 25 Q. We can see, although not quite on that page, but on the

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1 version I'm looking at we can see it's v1.10, so it's
 2 the one that was in force on 4 May. If we go to page 3,
 3 please, Mr Lopez {INQ017233/3}.
 4 1.1, introduction. 1.2, this is the very point that
 5 you were agreeing with me upon a moment ago:
 6 "This protocol refers to the provision for the
 7 spontaneous deployment of armed response vehicles (ARV)
 8 on cross-boundary operations within the north-west
 9 region."
 10 A. Yes.
 11 Q. 2.1, force control rooms. 2.2:
 12 "It is anticipated that the initial response to
 13 an MTFA incident will be coordinated by the host force's
 14 control room with the immediate deployment of resources
 15 to the scene being authorised by the force incident
 16 manager/force duty officer."
 17 A. Yes.
 18 Q. Which force would the host force be? Would that be the
 19 force requesting assistance --
 20 A. The force that needed the assistance, yes.
 21 SIR JOHN SAUNDERS: FIM and FDO are the same thing but just
 22 using different names?
 23 A. Yes, force incident manager and force duty officer.
 24 MR GREANEY: We had understood, I can't remember from which
 25 witness, probably Richard Thomas or Neil Basu, that

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1 those terms are interchangeable and many forces use the
 2 term --
 3 A. They do.
 4 Q. -- force incident manager but for some reason, I'm not
 5 suggesting it wasn't a good reason, use the term FDO.
 6 Then at 2.5 we find that section headed "Initial
 7 actions by host force FIM/FDO".
 8 A. Yes.
 9 Q. So what should we understand from this section? We've
 10 seen a similar section in the GMP SOP 47.
 11 A. Yes.
 12 Q. Is this section in appendix C dealing with the same,
 13 similar or a different situation?
 14 A. No, it's dealing with the same situation.
 15 Q. We can see at 2.6:
 16 "Once the host force FDO has confirmed that they are
 17 dealing with an MTFA incident they will consider the
 18 following actions (in priority order) as urgent
 19 requirements."
 20 And we can then see the first five bullet points.
 21 A. Yes.
 22 Q. Indeed, all five bullet points. I won't read through
 23 those, they're there to be read.
 24 Over to the next page, please {INQ017233/4}. We see
 25 at 2.7:

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1 "Initial actions by supplying force FIM/FDO."
 2 So does that anticipate that there will be in the
 3 force from which help is being sought also an FDO who
 4 will perform a role?
 5 A. Yes.
 6 Q. Would that role be equivalent in terms of pressure to
 7 the role being performed by the FDO within the host
 8 force?
 9 A. No, no, it would be completely different. The call
 10 would come in from the requesting force, the force that
 11 would then become the host force once the resources
 12 arrived. Obviously they would already be dealing with
 13 the MTFA at that point, so the amount of work they would
 14 have would be huge.
 15 Q. Yes. So there would probably be no comparison between
 16 the burden --
 17 A. None whatsoever.
 18 Q. -- upon the FDO in the host force and the FDO in the
 19 supplying force?
 20 A. Absolutely.
 21 Q. When you were preparing your plan on 4 May, did you
 22 prepare a section that dealt with the actions required
 23 of an FDO?
 24 A. Yes.
 25 Q. And did you have regard to paragraph 2.5 and 2.7,

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1 neither of those or one of those?
 2 A. 2.5 has disappeared from my screen now, but --
 3 Q. Put 2.5 on, it's page 3, please. It's "Initial actions
 4 by host force FIM/FDO".
 5 A. Yes.
 6 Q. You told us that you used this document as a template.
 7 So when you prepared your plan, did you have regard to
 8 and indeed incorporate paragraphs 2.5 and, more to the
 9 point, 2.6?
 10 A. Yes, I believe so.
 11 Q. We're going to see that in a short time.
 12 Thank you, we can take that from the screen,
 13 Mr Lopez. We're going to come back and look at this
 14 section in due course.
 15 We've referred many times now to the fact that you
 16 prepared a document on 4 May. By whom were you
 17 requested or tasked to prepare that plan?
 18 A. Inspector Lear.
 19 Q. At that stage what was the position of Inspector Lear
 20 in relation to you?
 21 A. He was my line manager.
 22 Q. What did you understand that you had been asked to do?
 23 A. We had, as I recall, a discussion around that and the
 24 decision or my suggestion -- I believe it was my
 25 suggestion -- was to update appendix C rather than

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1 create a stand-alone purely Manchester document, which
 2 would then allow all of the region to take possession of
 3 that document and use it for the purposes of
 4 commonality.
 5 Q. I just want to be clear about a number of things. That
 6 wasn't a criticism. When was it that you were asked by
 7 Inspector Lear to do this work?
 8 A. Probably April, I would have thought. We got through
 9 the work relatively quickly.
 10 Q. I believe that that's something that Inspector Lear will
 11 agree with you about.
 12 Why did you understand that you were being asked to
 13 do work on a Plato plan? What was the trigger for it?
 14 A. I don't actually know the trigger. But certainly
 15 I understood there was a sense of urgency. I was
 16 constantly being asked about progress on that.
 17 Q. I think we know, and I'll be corrected if I'm wrong
 18 about this, that shortly before April 2017 the refreshed
 19 CTPHQ guidance for a Plato incident had been published.
 20 A. Yes, in March.
 21 Q. So it may well be that that was the driver for this
 22 change or one of them; does that seem sensible?
 23 A. Yes.
 24 Q. No doubt we'll establish that with the other witnesses.
 25 Did you understand, bearing in mind those three layers

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1 that we agreed on earlier, that you were being asked to
 2 prepare a plan that would address the issues at the top
 3 layer, the middle layer or the bottom GMP operational
 4 layer?
 5 A. I think my plan really spanned all of them -- well,
 6 actually, it wouldn't have spanned the top layer of the
 7 cross-boundary, but certainly everything MTFA-related,
 8 so appendix C and GMP SOP 47, it would have spanned
 9 across all of those things.
 10 Q. Your intention was that it would deal with how GMP at
 11 that bottom layer was to respond to an MTFA and that
 12 it would also address the cross-boundary issues that
 13 might well be involved in an MTFA?
 14 A. Yes.
 15 Q. So the supply of assets from one force to another?
 16 A. Yes, absolutely.
 17 Q. Was there any consultation by you or by anyone else so
 18 far as you know about this proposal to prepare something
 19 that would be applied regionally?
 20 A. I don't think so.
 21 Q. Was it your understanding that the upshot of your work
 22 was going to be something that would be applied not just
 23 in GMP but also in Cheshire and the other forces?
 24 A. Yes.
 25 Q. So there you are, you've been given the task and there

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1 are three documents that exist for you at that time.
 2 A. Yes.
 3 Q. So there is the overall plan, v1.4. There is
 4 appendix C, v1.10, and there is SOP 47, v5.
 5 A. Yes.
 6 Q. Did you have regard to any or all of those in the work
 7 you were doing?
 8 A. All of them. Obviously the cross-boundary, not so much
 9 because the overarching cross-boundary version 1.4,
 10 that is still a stand-alone document which this would
 11 attach at appendix C to. That is for non-MTFA matters.
 12 Q. And you decided that you would use appendix C as opposed
 13 to SOP 47 for what reason or reasons?
 14 A. I just thought it was the best document that we had at
 15 that time. It was the most applicable, the most
 16 detailed and it seemed an obvious thing to do to use
 17 that as a basis.
 18 Q. In the work that you were doing, can you recall whether
 19 you had regard to the refreshed CTPHQ guidance?
 20 A. The version 1?
 21 Q. Yes.
 22 A. Yes, I most certainly did.
 23 Q. I think the answer to this question will be no, bearing
 24 in mind the evidence you gave before lunch. Did
 25 you have regard in the work you were doing in that April

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1 and into May to the views that were held by the
 2 Inspectorate?
 3 A. No.
 4 Q. What was your aim in terms of the FDO and the role that
 5 he or she would have in an MTFA? What were you aiming
 6 to achieve for that person?
 7 A. I wanted to create a detailed plan where everything was
 8 in one place so that rather than having lots and lots of
 9 different plans to go to and have to try to digest
 10 a huge amount of information, this would be everything
 11 in one place and then your appendices attached to that,
 12 including your drop-down menu.
 13 Q. Did you intend that your document, the new document,
 14 would replace appendix C, version 1.10?
 15 A. Yes, I did.
 16 Q. Did you intend that it would also replace SOP 47,
 17 version 5?
 18 A. At that time I was just replacing appendix C. Obviously
 19 as the document grew and changed, I believe that it did
 20 do that. But at the time that I wrote it, my intention
 21 was purely to replace appendix C.
 22 Q. What I'm going to do next is to look at the document
 23 that you created with the date of 4 May 2017. It may be
 24 helpful if once we have had a look at it, we compare and
 25 contrast the provisions of your plan with the provisions

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1 of the earlier plan, v5. Does that make sense?
 2 A. Yes.
 3 Q. We can have your document on the screen, please. It's
 4 {INQ029178/1}.
 5 Could we go to — first of all, if you can clear up
 6 one thing. This is your plan of 4 May and this was the
 7 first plan, I think, that you had produced, was it not?
 8 A. It is.
 9 Q. We can see in green, in the bottom right-hand corner,
 10 it's marked v2 or version 2. Are you able to explain
 11 that bearing in mind it was the first one you had
 12 prepared?
 13 A. Yes. That is because it is a refresh of appendix C,
 14 which was version 1.10. There's obviously been quite
 15 a significant change, therefore it would require a whole
 16 number.
 17 Q. So I think I understand what you're saying to us. Was
 18 the approach within GMP at that time that if an update
 19 was made to an existing plan or policy which was not
 20 that substantial, so not greater than 10%, it would go
 21 from being version 1.1 to version 1.2?
 22 A. Yes.
 23 Q. So a different version of an existing plan. But that if
 24 a more substantial change was made to a plan or policy,
 25 it would go from being version 1 to version 2 and so on?

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1 A. Yes.
 2 Q. So your view was that this document that you were
 3 creating was taking appendix C, version 1.10, from
 4 version 1 to version 2?
 5 A. Yes.
 6 Q. I hope that makes some sense.
 7 SIR JOHN SAUNDERS: 10% is plucked from the sky or?
 8 MR GREANEY: It's plucked from the statement of the witness.
 9 SIR JOHN SAUNDERS: Thank you.
 10 MR GREANEY: Or certainly from either your statement or the
 11 statement of Mr Lear.
 12 A. Mr Lear, yes.
 13 Q. That was the approach that was adopted, wasn't it?
 14 A. It was, yes.
 15 Q. Could we go, please, to page 3 of your plan.
 16 {INQ029178/3}.
 17 We can see that this is in fact following the
 18 structure of appendix C, is it not?
 19 A. It is.
 20 Q. Some of the typeface is in black and some of it is in
 21 green.
 22 A. It is.
 23 Q. Does the difference in colour help us to understand
 24 anything?
 25 A. It does, yes. The black text is text that was already

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1 existed in 1.10 and the green is the additional text
 2 that I've added.
 3 Q. Then if we could go over the page to {INQ029178/4},
 4 please.
 5 We can see that here we have that heading that we
 6 saw in appendix C:
 7 " Initial actions by host force FIM/FDO."
 8 A. Yes.
 9 Q. If we scroll down that page and then go on to
 10 {INQ029178/5}, please.
 11 And scroll down that page and go to {INQ029178/6}.
 12 We can see that there is very much more green
 13 in that section than there is black.
 14 A. There is.
 15 Q. So you had made substantial additions to the section 2.6
 16 " Initial actions by host force FIM or FDO"?
 17 A. I had, yes.
 18 Q. What I'm going to ask that we do next is go back to
 19 {INQ029178/4}, please, and put that on the screen. Then
 20 we're going to try something new, Mr Lopez, which is to
 21 see if we can have two different INQ documents on the
 22 screen at the same time. What I'm going to ask that
 23 we have on screen at the same time is the SOP 47, v5.
 24 So could we also have {INQ039970/6}, please? We'll have
 25 the two alongside each other.

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1 We can see on the left—hand side the document you
 2 prepared, " Initial actions by host force FIM/FDO".
 3 A. Yes.
 4 Q. And then we can see on the right—hand side, the
 5 comparable section from SOP 47.
 6 A. Yes.
 7 Q. Would it be fair to say, do you think, that section 2.6
 8 in your document was more substantial than the section
 9 in SOP 47?
 10 A. It was.
 11 Q. And was expressed in certain respects in different
 12 terms?
 13 A. Yes.
 14 Q. And that it included actions required of an FDO that had
 15 not been included in SOP 47?
 16 A. Yes.
 17 Q. I don't want this to sound like criticism , it's not
 18 meant that way, but you were making in this document,
 19 the new document, no doubt for good reason, the
 20 responsibility of the FDO more burdensome, not less
 21 burdensome; is that fair?
 22 A. Certainly the duties that should be undertaken, yes,
 23 most certainly. But obviously within that, I'm not
 24 specifying that it must be the FDO that does all of
 25 that.

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1 Q. This is really what we need to understand, because
 2 I just want to take a couple of examples, and I could
 3 easily have got this wrong. Where we see, for example,
 4 that in your new document the FDO had responsibility for
 5 the briefing of unarmed staff, I don't think that was
 6 in the SOP 47. And if on the left—hand side of the
 7 screen we could go on to {INQ029178/5}, please, the
 8 bottom half of that page, we can see:
 9 "CTSFOs... contact and request immediate
 10 deployment."
 11 I think that is also new?
 12 A. It is.
 13 Q. And over to {INQ029178/6}. We can see other
 14 responsibilities which I think are new.
 15 A. Yes.
 16 Q. Contact OSCT?
 17 A. Yes.
 18 Q. Contact and brief force media and contact and brief
 19 Regional Counter—terrorism Intelligence Unit?
 20 A. Yes.
 21 Q. So really what I would like your help with is the answer
 22 to this question: on the one hand, you well understood
 23 that in the event that there was an MTFA the place where
 24 the system might break down would be with the FDO?
 25 A. Yes.

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1 Q. And the reason for that was because he would be hit by
 2 a massive wave, as I think you put it earlier ?
 3 A. Yes, most certainly.
 4 Q. Yet here you've been given the responsibility for
 5 preparing a new plan for an MTFA and you are imposing
 6 additional responsibilities on someone who is already at
 7 risk at being overwhelmed, so an even bigger wave?
 8 A. Yes.
 9 Q. How do those two things sit alongside each other, first
 10 of all your understanding of the risk and, secondly,
 11 adding to that risk ?
 12 A. Absolutely. My understanding of that is that these are
 13 the duties that must be discharged by the FDO. That's
 14 not saying that the FDO is responsible for doing all of
 15 them personally, what it's saying is that the FDO is
 16 responsible for ensuring these things occur.
 17 SIR JOHN SAUNDERS: Can I just check? The contacting the
 18 OSCT, the first bullet point on the left —hand side as
 19 we're looking at it , I have seen that elsewhere in
 20 documents we've looked at so far. I just wanted to make
 21 sure that it was actually new and different from the
 22 document on the right—hand side.
 23 MR GREANEY: Sir, I will make sure that we do a comparison
 24 of the relevant documents. These were just examples
 25 that I picked out. If I've made a mistake, I'm sorry.

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1 SIR JOHN SAUNDERS: I'm not saying you have. It's something
 2 I have seen as something that had to be done, but I'm
 3 not sure which document that came in.
 4 MR GREANEY: It certainly emerged in the evidence of Mr Basu
 5 that that was something that —
 6 SIR JOHN SAUNDERS: I have seen it written, I think. It's
 7 not very helpful of me not to be able to identify where
 8 I've seen it written.
 9 MR GREANEY: I am sure someone will be able to identify it.
 10 On any view, there's no dispute between us, is
 11 there, that the responsibilities of the FDO increased in
 12 accordance with this new plan?
 13 A. Yes.
 14 Q. Albeit, as you have just explained to us, you were not
 15 saying these are responsibilities that the FDO had to do
 16 personally?
 17 A. Yes.
 18 Q. Can you help us with where in the new plan provision was
 19 made for who was to support the FDO in discharging these
 20 responsibilities , or was that to be left to the FDO to
 21 decide?
 22 A. That would be left to the OCB commanders, sir. I'm not
 23 OCB, I don't have any contact with them whatsoever.
 24 Q. And were you ever asked to consider the introduction of
 25 an action card system where particular people within the

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1 control room would have a card that said, "It's your job
2 to contact force media, it's your job to contact the
3 OSCT"?

4 A. I don't think I was ever tasked with doing that, but
5 that is what I created, so the Plato checklist, which
6 I think is at appendix D maybe of my document, that does
7 give a checklist.

8 SIR JOHN SAUNDERS: I'm not sure that's what Mr Greaney was
9 talking about. I think Mr Greaney was actually talking
10 about designating particular other people to do various
11 of these jobs.

12 A. Right. No, I didn't lay down any structure that would
13 assist them in achieving that, no.

14 MR GREANEY: Because I'm sure you can understand the point,
15 and it's a point that was made by a witness who's given
16 evidence already, that the difficulty which might arise
17 if people don't have designated tasks is that in the
18 early stages of an incident either the people in the
19 control room are having to say to the FDO, "What should
20 I do, boss?", or the FDO is having to say to those
21 people, "This is your job" --

22 A. Yes, absolutely.

23 Q. -- which may result in a loss of time?

24 A. Most certainly.

25 SIR JOHN SAUNDERS: And sometimes it's quicker to do it

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1 yourself.

2 MR GREANEY: And sometimes it's quicker to do it yourself.
3 You mentioned your Operation Plato checklist, quite
4 rightly, and we should look at that. It starts at
5 {INQ029178/13}. This is the document on the left--hand
6 side of the screen.

7 I'm not going to read through all of this, but
8 we can see it really is a list of things for the FDO to
9 go through and tick off as they are done?

10 A. It is.

11 Q. It continues over on {INQ029178/14-15}. But as you
12 fairly acknowledged, it's a list, a checklist, of the
13 various and substantial responsibilities on an FDO, but
14 it does not indicate where another person might
15 reasonably be expected to discharge that responsibility.

16 A. No, absolutely.

17 SIR JOHN SAUNDERS: Mr Greaney, can we just go on to page 7
18 of the one on the right--hand side {INQ039970/7}? So we
19 see the FDO.

20 (Pause)

21 Okay, looking at that document on that page, it
22 doesn't appear to have the requirement to contact OSCT.

23 A. No.

24 SIR JOHN SAUNDERS: Which is quite surprising as it was
25 a requirement, wasn't it?

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1 A. It was, but I think the document that we received that
2 instruction on was the March 2017 document, sir, the
3 advice to forces created by Inspector Nutter, version 1.

4 MR GREANEY: We'll check that, but that may in fact very
5 well be correct. The point that you're making is that
6 we have Superintendent Giladi preparing version 5 of
7 SOP 47 in October 2016. We then have the refreshed
8 CTPHQ guidance.

9 A. Yes.

10 Q. Which was authored by Inspector Nutter and
11 Inspector Thomas in March of 2017.

12 A. Yes.

13 Q. And here you are, in April/May 2017, preparing a plan
14 taking into account, as you've said, the Nutter/Thomas
15 document?

16 A. Yes, that's correct.

17 Q. As I'm sure you'll agree, it's one thing to prepare
18 a plan for dealing with an eventuality, it is another
19 thing to ensure that those who have responsibilities
20 under the plan understand what those are?

21 A. Most certainly.

22 Q. So let's see -- we know about the first stage in that.
23 Let's see what was happening at the second page.
24 Inspector Lear had commissioned you to prepare this
25 plan and you had prepared it in accordance with his

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1 wishes or instructions?

2 A. Yes.

3 Q. Were you involved in the process of -- we're at
4 paragraph 65, sir -- approving and/or signing off the
5 new procedures?

6 A. No.

7 Q. Whose responsibility did you understand that was?

8 A. That would be the firearms lead, so probably Mr Giladi
9 in consultation with Mr Lear.

10 Q. I'm going to ask that we look at an email that
11 Inspector Lear sent out. I referred to it much earlier
12 today. It's the email of 12 May, which he recalls, and
13 I believe you recall this as well, was accompanied by
14 your new plan.

15 A. It was.

16 Q. Mr Lopez, the reference for this email is {INQ039966/1}.
17 You in fact referred to this earlier as well,
18 Mr Whittle, because I was asking you what the plan was
19 for training in accordance with your procedure and you
20 told me that you thought it was addressed in this email.
21 The email that we need to focus on is the one of
22 12 May 2017, 13.58 hours. Sent to OCR duty inspectors?

23 A. Yes.

24 Q. Who would those people be?

25 A. That is the FDOs, force duty officers.

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1 Q. So this was going out to the FDOs. The force specialist
 2 cadre?
 3 A. Yes.
 4 Q. Who is that?
 5 A. That's the cadre tactical firearms commander tactical
 6 firearms commanders.
 7 Q. ACC Debbie Ford?
 8 A. Yes.
 9 Q. ACC Catherine Hankinson?
 10 A. Yes.
 11 Q. Robert Potts?
 12 A. Yes.
 13 Q. Who was he?
 14 A. He's again another ACC.
 15 Q. Another ACC, Rebekah Sutcliffe?
 16 A. Yes.
 17 Q. And Vanessa Jardine?
 18 A. Yes, the ACC firearms lead at that time.
 19 Q. And we can see that the email is cc'd to a variety of
 20 other people, including Inspector Nutter, and you -- and
 21 are you able to say in general terms the category or
 22 categories of those persons?
 23 A. I think within that from memory we've got a mixture of
 24 OFCs and TAC advisers.
 25 Q. So was this email really being circulated to those who

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1 might be expected to have responsibilities in the event
 2 of an MTFA?
 3 A. Yes.
 4 Q. We see what Inspector Lear said -- and I have indicated
 5 already that he recalls that this was accompanied by
 6 your plan:
 7 "Dear all, I am now in possession of the first of
 8 the command CPD sessions for the current training year
 9 2017 to 2018. Please are aware that these sessions form
 10 part of the SFC/TFC/OFC and TA role profile, as such
 11 attendance of the sessions is compulsory to remain
 12 authorised in the respective role."
 13 So this was training designed to ensure that those
 14 with responsibilities under your v2 plan should know
 15 what they were?
 16 A. Yes.
 17 SIR JOHN SAUNDERS: Does that include FDOs?
 18 A. Yes, it does.
 19 MR GREANEY: "This year's theme revisits MTFA but with some
 20 additional considerations included in light of the
 21 recent terrorist attack methodology seen in Nice and
 22 Berlin. The theme has largely been chosen in response
 23 to the command-related findings and recommendations that
 24 have emerged from recent HMIC inspections and national
 25 exercising in respect of the readiness of police forces

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1 for such attacks. It will also provide an opportunity
 2 for commanders and advisers to consider and discuss the
 3 revised Operation Plato initial response contingency
 4 planning guidance for police forces [that is the
 5 refreshed CTPHQ document], JOPs edition 3 [which had
 6 been introduced in January of 2016] and the north-west
 7 regional cross-boundary policy."
 8 A. Yes.
 9 Q. Is that a reference to your plan or to the top-level
 10 plan?
 11 A. That's a reference to the top-level plan which obviously
 12 my plan would then sit at appendix C within that.
 13 Q. "The aims [the email continues] of the session are: to
 14 examine current national and force policy and
 15 operational arrangements related to Operation Plato
 16 dealing with a multi-seated marauding terrorist attack,
 17 marauding terrorist firearms attack and post-incident
 18 procedures relating to it; to provide an opportunity to
 19 explore the command and tactical adviser challenges and
 20 considerations in responding to an extreme threat
 21 incident. I have attempted to provide as much
 22 notification as possible and spread the days to ensure
 23 maximum attendance."
 24 Next page, please, Mr Lopez {INQ039966/2}:
 25 "OFC/TAs. It is expected that you will attend these

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1 sessions during your training week. However, it is for
 2 you to manage. Exact timing and classroom numbers will
 3 be emailed closer to the time. Please select one of the
 4 below dates and return so I can collate."
 5 So was that an invitation to really all of those
 6 that have been copied into the email, including FDOs?
 7 A. Yes.
 8 Q. And the dates that are given are then a series of dates,
 9 six in total, spread from 11 August to 15 September.
 10 A. Yes.
 11 Q. I do appreciate that you may well not have had
 12 responsibility for fixing those dates, but is the upshot
 13 this, that in early May you had introduced really
 14 a substantially different plan for, in particular, the
 15 role of the FDO during an MTFA?
 16 A. Yes.
 17 Q. And it looks as if those who needed to know what their
 18 responsibilities were were not to be trained in that for
 19 a number of months?
 20 A. Yes, on the face of it, sir, yes.
 21 Q. Looking back at it now, does that seem like a good idea?
 22 A. In hindsight, no, it doesn't, but obviously they were
 23 provided with those documents so that they did have
 24 access to them. But in hindsight, no, I completely
 25 agree, it would be advantageous to bring that training

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1 forward.
 2 SIR JOHN SAUNDERS: So how was the document provided? There
 3 doesn't seem to be an attachment to this email.
 4 (overspeaking) from what I can see.
 5 A. It was attached.
 6 MR GREANEY: The recollection of Inspector Lear, as he'll
 7 explain to us, and your recollection I know, is your
 8 document was an attachment to this email?
 9 A. Yes.
 10 SIR JOHN SAUNDERS: We ought to be able to tell that from
 11 the email.
 12 MR GREANEY: My reaction to the email was exactly the same
 13 as yours. There is no express reference or anything
 14 else to indicate that was so. But the recollection of
 15 both witnesses is that it was an attachment, but maybe
 16 we can look into that —
 17 SIR JOHN SAUNDERS: It may be sent out by a separate email,
 18 it's possible.
 19 A. I believe it was attached to this one.
 20 SIR JOHN SAUNDERS: It could be the irrelevant and sensitive
 21 part, I don't know. One could look at the original.
 22 MR GREANEY: I don't think it is, in fact. We'll look into
 23 that. Let's proceed on the assumption that the document
 24 was attached.
 25 SIR JOHN SAUNDERS: Could you just go back to {INQ039966/1},

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1 I'm sorry.
 2 MR GREANEY: I think what we can see if we go higher up the
 3 page, sir, what's happening here is we have got an email
 4 that forwards on this email to someone else on I think
 5 22 May. Yes, on 22 May. That might be...
 6 A. Actually, sir, if you look underneath the subject, it
 7 does show a list of attachments.
 8 MR GREANEY: Thank you very much indeed. Mr Suter has shown
 9 me a copy — yes — of the email that's taken not from
 10 the Magnum system but from a different system that
 11 we have and that shows that the email did have three
 12 attachments: Operation Plato initial response
 13 contingency plan guidance to police forces, which is the
 14 CTPHQ refreshed guidance; the MTFA and terrorist siege
 15 JOPs edition 3, January 2016; and the cross-boundary
 16 appendix C, v2.
 17 A. Yes.
 18 Q. So would that be your document?
 19 A. It is, yes.
 20 Q. We now know that the document was attached to the email,
 21 so we just need to understand what someone in the
 22 position of Mr Sexton might reasonably be expected to
 23 have done in the period between 12 May and 22 May. We
 24 know that no training had been arranged for him during
 25 that period.

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1 A. No.
 2 Q. So far as you know, was any other instruction or offer
 3 of instruction made available to people in the position
 4 of —
 5 A. Not that I am aware of, sir.
 6 Q. Was it essentially then left to the FDOs and others to
 7 read your plan and work out for themselves what was
 8 expected?
 9 A. On the face of that, sir, yes.
 10 Q. And as you've accepted, that would not have assisted the
 11 FDO in relation to who within the force control room
 12 might be expected to assist them?
 13 A. I don't think even if we'd run the training the day
 14 after we would have specified that, sir. Obviously
 15 staffing within the force control room, we have no
 16 knowledge of that whatsoever, so that really — we would
 17 still expect the force control room supervisors to come
 18 up with a plan for that.
 19 Q. In paragraph 69 of your witness statement — and I have
 20 nearly finished with this document, we can take the
 21 email from the screen, Mr Lopez — you say:
 22 "I agree with Inspector Lear's assertion that this
 23 4 May 2017 document was in place at the time of the
 24 attack as the intended replacement for appendix C."
 25 A. Yes.

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1 Q. "I also agree with him that between 12 May and 22 May
 2 it is possible that people might not have had sufficient
 3 time to read or fully understand it."
 4 A. I think that's very probable, sir, yes. It was a huge
 5 amount of material change-wise.
 6 SIR JOHN SAUNDERS: Are you leaving that paragraph?
 7 MR GREANEY: I was going to ask a question that touches upon
 8 it, sir, but by all means.
 9 SIR JOHN SAUNDERS: I just find it slightly confusing. It
 10 was in place at the time of the attack, but it's not the
 11 replacement but the intended replacement. So it was
 12 going to replace it in future is how I read that.
 13 A. Yes. The reason for that, sir, being that appendix C is
 14 obviously a regional document, so we don't have the
 15 power to impose that we have now changed appendix C;
 16 that would have to go through to the region.
 17 SIR JOHN SAUNDERS: But to GMP people there was sufficient
 18 to tell them that the new appendix C now takes over, was
 19 there?
 20 A. Yes, absolutely. As a local document, we were using
 21 that document. But certainly regionally, that would be
 22 a matter for the region to accept it.
 23 SIR JOHN SAUNDERS: Thank you.
 24 MR GREANEY: The chairman might not believe me, but I was
 25 about to ask a very similar question.

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1 SIR JOHN SAUNDERS: I do believe you because I'm forever
2 asking questions that people are just about to ask.
3 MR GREANEY: You are, but I will frame it in a slightly
4 different way.
5 On 22 May 2017, shortly after 10.30 pm, what plan of
6 the various plans that we've looked at or plans would
7 you have expected Inspector Sexton to operate on the
8 basis of?
9 A. I would expect him to operate on the basis of the one
10 that he's most familiar with and most comfortable with,
11 sir.
12 SIR JOHN SAUNDERS: That's not what you expected, was it?
13 MR GREANEY: No.
14 Which plan would you have expected, v5, your v2, or
15 something else?
16 A. I think that would be a question only Mr Sexton could
17 answer. I don't know if he had the time to read it,
18 understand it, and think, "Actually, yes, it's a good
19 plan", or whether he could make neither head nor tail of
20 it. I have no idea, sir.
21 Q. Some people might say that sounds like a less than ideal
22 situation and that, as I think we agreed earlier, it's
23 not enough just to have a plan, those with
24 responsibilities under it ought to understand what those
25 responsibilities are. Does that sound fair?

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1 A. I totally agree. We turned this plan around in very,
2 very quick time and obviously in hindsight we most
3 certainly should have put on training sessions
4 immediately. But hindsight is always 20/20,
5 unfortunately.
6 SIR JOHN SAUNDERS: I can understand you saying "provided
7 they had had time to read it". Obviously it's very
8 difficult to implement what you haven't had time to read
9 and take in. You also added if he agreed with it, which
10 I find more surprising. Are you saying he didn't have
11 to put it in --
12 A. No, no, he would certainly have to. What I mean is,
13 sir, if he fully understood and agreed with the way that
14 I structured it. So would he be able to use that plan
15 himself without -- as we mentioned before -- creating
16 highlights and personalising it, sir.
17 MR GREANEY: I'm nearly at the end of asking you questions
18 about Plato plans, as all will be delighted to hear.
19 You did in fact create two further iterations of your
20 version 2 of appendix C, did you not?
21 A. I did.
22 Q. Sir, I am now at paragraph 71.
23 I don't believe we need to show these on the screen.
24 First of all, you produced a v2.1 dated 11 July 2017?
25 A. Yes.

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1 Q. The reference is {INQ031287/1}?
2 A. Minimal.
3 Q. Bearing in mind it was v2.1 and not v3, the changes were
4 not greater than 10%?
5 A. They were minimal, sir, yes.
6 Q. Indeed, what were the changes you made to that document
7 from v2.0?
8 A. From recollection, I think I added a radio channel.
9 Q. Let me ask you the question in a rather more leading
10 way. I think what happened was that the intention, as
11 you told us, was for you to create a document that would
12 be used across NWAPC.
13 A. Yes.
14 Q. But that initially, NWAPC didn't approve your document
15 or introduce it across the region?
16 A. That's correct.
17 Q. And so the change that you made as between version 2 and
18 version 2.1 was simply to remove the badges of the other
19 members of the NWAPC from the document?
20 A. Yes, that's correct.
21 Q. And there were also, as you've said, amendments relating
22 to radio channels or Talk Groups that we don't need to
23 look at?
24 A. Yes.
25 Q. There was then very shortly afterwards, indeed 18 days

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1 afterwards, version 2.2, 19 July 2017, {INQ007628/1}.
2 Were you the author of that document too?
3 A. Yes.
4 Q. Were the amendments which featured to put the document
5 back into a regional format with the insertion of other
6 force badges?
7 A. Yes.
8 Q. But was it your understanding at that stage that this
9 was a local GMP document or a regional NWAPC document?
10 A. At that time, I understood it to be a local document,
11 the document reading "A local procedure document" on the
12 front.
13 Q. And did you understand that the changes as between v2.1
14 and v2.2 were as the result of, as you put it, a CT
15 inspection carried out by Mr Nutter?
16 A. Yes, that's correct.
17 Q. Which we've heard referred to, I think, as the assurance
18 visit?
19 A. Yes.
20 Q. Did you meet Mr Nutter, do you recall, during that
21 visit?
22 A. I didn't, no.
23 Q. We can see, if we look at the document in our own time,
24 that you inserted a new paragraph 4.5.
25 A. Yes.

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1 Q. Which was to deal with the appointment of a CT
 2 commander?
 3 A. Yes, that's correct.
 4 Q. Thank you very much indeed. That's all I need to ask
 5 you about Plato plans.
 6 I said that I would return to ask you questions
 7 about training that you carried out in an earlier part
 8 of 2017, namely, I believe, in January and February of
 9 that year.
 10 A. Yes.
 11 Q. This takes us back to page 5 and paragraph 15 of your
 12 statement.
 13 In the early part of 2017, did you work closely with
 14 Neil Gaskell of GMFRS?
 15 A. Yes and Simon Watson from NWS as well, yes.
 16 Q. What was the purpose of working together with them?
 17 A. It was to create a training event. We had an incredibly
 18 good working relationship with both the services.
 19 Q. What was it that provoked that training at that point in
 20 time?
 21 A. We met to discuss future training opportunities. As
 22 I recall, Mr Gaskell raised some feedback from
 23 Winchester Accord and I was keen to bring the commanders
 24 together to discuss the earlier parts of the joint
 25 operating principles because, from my mind, most

1 exercises that we conducted, we brought together staff
 2 so that we could provide the business as usual response
 3 for the public to make sure that the public didn't
 4 suffer as a result of us running exercises, which then
 5 meant that we had to have other staff brought on to
 6 cover the specific aspects that we were going to test
 7 and also because of the danger to the public about
 8 blue-lighting it around the force area, we would tend to
 9 amass everybody together.
 10 So it was quite unrealistic that we hadn't actually
 11 tested the earlier parts of JOPs which created the links
 12 together for us all to make sure that we came together
 13 and that's what I was really keen to test.
 14 Q. I was in fact going to ask you, because the answer to
 15 this wasn't apparent from your statement, whether the
 16 outcome of Exercise Winchester Accord was any part of
 17 the reason for this training. It sounds like it was,
 18 what, the entire reason for it or part of the reason?
 19 A. Part of it. Certainly, as I recall, Neil mentioned
 20 issues around communication from Winchester Accord and
 21 I was really keen to test this and the two things seemed
 22 to gel together that this would be a good opportunity.
 23 Q. It doesn't sound from what you've said as if the
 24 learning points from Exercise Winchester Accord were
 25 brought to your attention in any particularly formal

1 way.
 2 A. I don't recall them being, no.
 3 Q. This was really just Mr Gaskell raising it with you?
 4 A. Yes, as far as I am aware, yes.
 5 Q. That there had been some issues around communication?
 6 A. Yes.
 7 Q. And can you remember any more detail of what he said to
 8 you about what had come out of Winchester Accord?
 9 A. I don't recall at this moment, sir, no.
 10 Q. Did he, for example, tell you anything about whether
 11 GMFRS had attended the incident and, if so, at what
 12 point in time?
 13 A. I don't recall specific details around that, sir, no.
 14 I just recall mention of there being communication
 15 issues.
 16 Q. And just to remind ourselves so that we have the
 17 chronology in mind, Exercise Winchester Accord had
 18 occurred, I think, between 9 and 11 May 2016?
 19 A. Yes.
 20 Q. Did you prepare a PowerPoint presentation for that
 21 training?
 22 A. I did.
 23 Q. And various iterations of that presentation have been
 24 discovered, some only recently, as you know.
 25 A. Yes.

1 Q. I'm not going to inflict going through each of those on
 2 anyone, but I'll give the INQ references. They are
 3 {INQ040316/1}, {INQ019107/1}, {INQ040194/1} and
 4 {INQ040317/1}. And I think you fairly accept that there
 5 may have been other iterations as well?
 6 A. Very probably, sir, yes.
 7 Q. The differences, certainly from my point of view, don't
 8 matter greatly, although it may be that others will ask
 9 you about them, but what I do want to press you upon
 10 are the following points. First of all, I want to look
 11 at an early iteration of your presentation with you to
 12 see what kind of issues you wanted to address.
 13 Secondly, I'm going to look with you at an email that
 14 invited you to add to your presentation. It's an email
 15 that you have seen, I know.
 16 A. Yes.
 17 Q. Thirdly, I want to look at one example of a change you
 18 made, I don't know whether it's an important one, but
 19 you might recall you changed a diagram that dealt with
 20 different zoning within the presentation.
 21 A. Yes.
 22 Q. Fourth, I would like to look at some notes for the
 23 training and, fifth, just a few questions about who
 24 attended the presentation and who did not.
 25 I'm not going to finish in time to avoid another

1 break. Now would probably be a good moment for a break.
 2 SIR JOHN SAUNDERS: Okay. Ten minutes, is that enough?
 3 MR GREANEY: Ten minutes is fine, thank you.
 4 (2.27 pm)
 5 (A short break)
 6 (2.40 pm)
 7 MR GREANEY: Sir, just before we turn to look at the
 8 PowerPoint presentation, can I deal with the question
 9 you raised earlier about contacting the OSCT. Could
 10 we have on the screen, please, {INQ007211/1}.
 11 This is the March 2017 CTPHQ refreshed guidance.
 12 Could we go to {INQ007211/20}, please? I thank Mr Suter
 13 for running down this reference.
 14 SIR JOHN SAUNDERS: I'm very grateful. It gets done
 15 remarkably quickly.
 16 MR GREANEY: Paragraph 9.7:
 17 "The affected force SFC or duty chief officer has
 18 the responsibility for making the formal MACA request to
 19 enable the employment of [particular assets]. Contact
 20 OSCT operational support team as soon as practicable."
 21 I think, sir, that is the reference that you had in
 22 mind.
 23 SIR JOHN SAUNDERS: Okay. Is that new guidance or had that
 24 been the guidance before?
 25 MR GREANEY: I think that was in addition to the guidance

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1 in --
 2 SIR JOHN SAUNDERS: We can check that too. I'm sure
 3 Mr Suter will know instantaneously, but just in case he
 4 doesn't.
 5 MR GREANEY: On the assumption this was new for the
 6 refreshed guidance, the reference of Mr Whittle appears
 7 to be correct.
 8 SIR JOHN SAUNDERS: Absolutely. Thank you for that.
 9 MR GREANEY: Mr Whittle, to your PowerPoint presentation
 10 then, so we are now at {INQ040316/1}. Just for your
 11 information, this is, you think, an early iteration of
 12 your PowerPoint presentation?
 13 A. Yes.
 14 Q. We won't look at every page of this. Could we go, first
 15 of all, to {INQ040316/3}, please. The aim:
 16 "To discuss joint operating principles for the
 17 emergency services and identify any areas that are weak
 18 or unworkable. Ensure that any identified areas are
 19 quickly rectified and tested to ensure an effective
 20 joint service response to a marauding terrorist firearms
 21 attack."
 22 A. Yes.
 23 Q. That's really very much what you were telling us about
 24 earlier, that this was a focus of this training, to
 25 ensure in short that there was coordination between the

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1 emergency services dealing with an Operation Plato
 2 situation?
 3 A. It is.
 4 Q. Over the page to {INQ040316/4}. There is a lift from
 5 the joint operating principles. At {INQ040316/5}, as
 6 well. We're going to move through this fairly quickly.
 7 As we know, joint operating principles: co-locate,
 8 communicate, coordinate, jointly understand risks,
 9 shared situational awareness.
 10 A. Yes.
 11 Q. Over the page {INQ040316/5}, again an acronym that
 12 we are most familiar with, METHANE, which is about
 13 shared situational awareness: major incident declared?;
 14 exact location; type of incident; hazards present or
 15 suspected; access routes that are safe to use;
 16 number/type/severity of casualties; emergency services
 17 present and those required.
 18 {INQ040316/8}, next, please, so skipping a page, the
 19 joint decision model.
 20 {INQ040316/9}. This I just did want to ask you for
 21 your help about:
 22 "Commander locations. Where will commanders locate
 23 themselves?"
 24 Presumably these were slides that you intended to
 25 display on a screen.

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1 A. Yes.
 2 Q. And then to speak to in front of those who were
 3 attending?
 4 A. Yes.
 5 Q. So what was the point of this screen? What were you
 6 seeking to communicate?
 7 A. It was to tease out the different commanders'
 8 understanding of where they would locate themselves.
 9 Authorised Professional Practice Armed Policing, it does
 10 say there that police commanders should locate
 11 themselves where they are best able to achieve that role
 12 or perform that role, words to that effect. So the
 13 issue for us within this is: at what point do we get
 14 command grip on the ground?
 15 So we wanted to tease that out and understand from
 16 people's own perspectives of where they would consider
 17 would be the best place for them to locate themselves
 18 and then also consider whether there were any issues
 19 with them doing that.
 20 Q. So was it your intention -- we'll come to look at the
 21 actuality in a moment -- that there should be only
 22 police officers at these training sessions or that there
 23 should be representatives of the Fire and Rescue Service
 24 and Ambulance Service as well?
 25 A. Yes, absolutely, full tri-service.

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1 Q. So when you were talking about the location of
 2 commanders, were you talking about the location of
 3 commanders from the various emergency services?
 4 A. Yes.
 5 Q. Over the page to {INQ040316/10}. It's a lift from
 6 JESIP:
 7 "Personnel from any emergency service should not
 8 hesitate to report that an MTFA is underway.
 9 Information on a suspected MTFA should be shared amongst
 10 emergency services control rooms immediately."
 11 So was it something that you wished to emphasise,
 12 that the provision of information should occur
 13 immediately?
 14 A. Yes, absolutely.
 15 Q. It goes on to emphasise other emergency service control
 16 rooms must be notified immediately.
 17 Over the page to {INQ040316/11}. Very similar
 18 points being made.
 19 {INQ040316/14}, paragraph 4.4 —
 20 SIR JOHN SAUNDERS: Do you mind going back one?
 21 MR GREANEY: No, sir, I'm skipping over this rather quickly.
 22 SIR JOHN SAUNDERS: That's fine. {INQ040316/13}. Are you
 23 using — sorry, perhaps this is... Do you use MTFA
 24 being declared, which may be the next page, as
 25 synonymous with Plato being declared?

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1 A. Yes.
 2 SIR JOHN SAUNDERS: So they're interchangeable in this
 3 document?
 4 A. No, not at all, sir: the MTFA is the incident;
 5 Operation Plato is the tri-service response to that
 6 incident.
 7 MR GREANEY: {INQ040316/14}, paragraph 4.4:
 8 "The police will instigate a three-way
 9 telecommunication link between the emergency services'
 10 control rooms."
 11 What did you understand that meant and what were you
 12 trying to communicate to those who attended your course?
 13 A. This was to address the method of establishing that
 14 three-way comms so all three of the emergency services
 15 fully understood what was going on, so how would we do
 16 that.
 17 SIR JOHN SAUNDERS: This comes directly from JOPs 3, doesn't
 18 it?
 19 A. It does, yes, sir.
 20 MR GREANEY: Almost all of what we're going to be looking at
 21 is from JOPs 3.
 22 A. Yes.
 23 Q. {INQ040316/16}, next, please, for the identification,
 24 mobilisation and scene assessment:
 25 "During the marauding phase of an attack, the

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1 information and intelligence picture is likely to be
 2 very confused. During this phase the TFC based in the
 3 force control/operations room is the person most likely
 4 to be best placed to make an effective assessment of the
 5 location of the attacks and location of the terrorists ."
 6 A. Yes.
 7 Q. "Therefore a clear command protocol and effective
 8 communications should be established between the
 9 control/operations room-based TFC and the police
 10 on-scene commander."
 11 Then this passage:
 12 "The limits of exploitation (LoE) determining the
 13 zones should be set by the police commander with the
 14 most up-to-date information in respect of the location
 15 of the threat."
 16 Could you just explain that at a high level and
 17 without delving into anything that may be operationally
 18 sensitive?
 19 A. Around do you mean the — all of it, sir, or the LoEs?
 20 Q. The limits of exploitation.
 21 A. Probably the best way to describe it without causing any
 22 issues would be — obviously, our prime role is to save
 23 life, so the prime objective for us is to shrink down
 24 the amount of space that we can allow people to enter
 25 because the danger there is so great or is unknown. So

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1 the idea is we enter into those areas with the intention
 2 of identify, locate and confront and neutralise the
 3 threat —
 4 Q. Did you say shrink the areas?
 5 A. Yes.
 6 Q. Sorry, I interrupted you.
 7 A. By shrinking those areas that are the areas of the
 8 highest danger that we wouldn't want other people going
 9 into, then that means that the other areas are larger,
 10 so then we can allow non-specialist resources into them
 11 and specialist resources into them.
 12 Q. This is something that the chairman has posed some
 13 questions about over the course of the last number of
 14 weeks, the zoning. Let's have page 20 on the screen,
 15 because there is a diagram {INQ040316/20}. It may help
 16 us to understand these things.
 17 What we've already understood is — and you must
 18 tell if I've got this wrong — that once Operation Plato
 19 has been declared, I think at the very least
 20 consideration ought to be given to zoning; is that
 21 correct?
 22 A. Yes.
 23 Q. Is it your position that there ought always to be zoning
 24 or merely that consideration ought to be given to
 25 zoning?

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1 A. Zoning should be in place as soon as we possibly can
 2 because that then allows the rest of our considerations
 3 to take place.
 4 Q. So zoning should be in place, but who ought to be making
 5 that decision about zoning?
 6 A. As it said in the JOPs, really, whoever is the
 7 best-placed person to do that. In the early stages of
 8 an incident I think anybody would be very, very hard
 9 pressed to be able to do anything other than say all of
 10 it, so the whole of the venue would be hot.
 11 Q. What I don't want to do is to get too much into 22 May.
 12 I'm just trying to understand at a high level. I have
 13 no doubt others will help us with actual zoning on the
 14 day.
 15 So the person best placed makes the decision?
 16 A. Yes.
 17 Q. We know that there are or may be a hot zone, a warm zone
 18 and a cold zone?
 19 A. Yes.
 20 Q. Given your experience, how would you describe the hot
 21 zone?
 22 A. The hot zone is the area of highest threat where only
 23 armed police and other specialist assets are able to
 24 work.
 25 Q. Is that an area in which it is believed that the threat

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1 still exists?
 2 A. Yes.
 3 Q. So only particular persons are permitted into that area?
 4 A. Yes.
 5 Q. We then have something described as the warm zone?
 6 A. Yes.
 7 Q. How would you describe that?
 8 A. The warm zone is an area where the subjects have passed
 9 through and there is a potential for them to return to
 10 that area. So that area isn't safe, but it certainly
 11 isn't considered as dangerous as the hot zone. Within
 12 that area generally specialist responders will work
 13 unless the commanders at the scene agree that it's
 14 acceptable for non-specialist responders to work.
 15 Q. When you say the commanders at the scene, are you
 16 talking about a discussion about that issue between the
 17 commanders from the various emergency services?
 18 A. Yes, absolutely.
 19 Q. And then we have the cold zone. That speaks for itself,
 20 but nonetheless could you help us with that?
 21 A. The cold zone is an area where anyone can work because
 22 the threat is non-existent, therefore we can have
 23 non-specialist responders in there. Anybody at all can
 24 enter that area.
 25 Q. We can see that other things are indicated on this

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1 diagram. First of all, the RVP, what is that, please?
 2 A. That's the rendezvous point.
 3 Q. For which service or services?
 4 A. Potentially for all three. In the initial stages before
 5 we move to the forward command post we would establish
 6 an RVP. There are reasons why we wouldn't go straight
 7 to FCP I wouldn't want to discuss, but what we would
 8 wish to do as soon as we possibly could after that is
 9 establish an FCP.
 10 Q. Then we have CCP and CCS.
 11 A. Yes, the casualty collection point and the casualty
 12 clearing station?
 13 Q. And the LoE?
 14 A. That is the limits of exploitation.
 15 Q. Meaning what?
 16 A. Meaning the area that's been identified that assets will
 17 work within. So it will be given an LoE. It's like the
 18 most forward point that they can go. So for instance,
 19 if you've got a warm zone then the most forward point of
 20 the warm zone where it goes into the hot zone, that
 21 would be the limit of exploitation.
 22 Q. {INQ040316/21}. We'll see further information from JOPs
 23 that we'll understand better now we've had your
 24 explanation.
 25 Second bullet point:

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1 "As a measure for mitigating the risk to personnel
 2 operating in warm zones, it is necessary that on-scene
 3 commanders jointly agree and clearly stipulate limits of
 4 exploitation ..."
 5 A. Yes.
 6 Q. So effectively areas into which those resources can
 7 penetrate:
 8 "... the furthest points to which emergency
 9 responders will operate in warm zones."
 10 A. Yes.
 11 Q. {INQ040316/23}, please, paragraph 4.10. I'm just
 12 checking the screen each time to make sure I'm not going
 13 to read out anything that is operationally sensitive:
 14 "The police on-scene commander will lead a joint
 15 assessment of risk at the FCP or RVP with ambulance and
 16 FRS counterparts to determine when and where to deploy
 17 emergency service responders taking into consideration
 18 all available information."
 19 A. Yes.
 20 Q. And so what we're seeing throughout, really, all of
 21 these passages from JOPs is this idea that there must be
 22 coordination --
 23 A. Yes.
 24 Q. -- between and the exchange of information between all
 25 three emergency services?

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1 A. Absolutely.
 2 Q. Then {INQ040316/25}, the last part I want to take you
 3 to. Paragraph 4.12:
 4 "The boundaries of the hot, warm and cold zones must
 5 be frequently reviewed."
 6 A. Yes.
 7 Q. Again, it may be an invitation to do no more than state
 8 the obvious, but why?
 9 A. So that we can get rescuers into those areas as soon as
 10 possible, because obviously we've got a finite amount of
 11 resources, so if we can shrink a hot zone down and
 12 create more warm, then we can get specialist responders
 13 in there, and if we can shrink the warm zone down again
 14 and create more cold, we can get absolutely everybody in
 15 there.
 16 Q. So in the training that you intended to and did deliver,
 17 were these the messages that you wanted to get across?
 18 A. Yes.
 19 Q. The second topic that I wanted your help with is the
 20 email.
 21 SIR JOHN SAUNDERS: Do you mind if I just ask the question
 22 I've been asking repeatedly? Is there any guidance
 23 given anywhere in what you were talking about or in JOPs
 24 as to what you do when you have casualties who are being
 25 treated within a hot zone by the time, maybe members of

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1 the rescue services or members of the public — so what
 2 do you do, when you are a commander coming on and
 3 saying, "That's a hot zone, there shouldn't be anybody
 4 working there"? First of all, do you give any guidance?
 5 A. Yes, we do. Certainly our raison d'être as such is that
 6 we push forward and we identify and locate, confront and
 7 neutralise the threat. That is our prime role within
 8 this, sir. So people being treated within those areas,
 9 we would push past, create a safe zone for them to work
 10 in, but certainly at that point we wouldn't be offering
 11 any assistance.
 12 SIR JOHN SAUNDERS: You wouldn't be requiring them to leave?
 13 A. Yes, we do.
 14 SIR JOHN SAUNDERS: Where is this all set out?
 15 A. This is actually all set out in JOPs, as I recall.
 16 SIR JOHN SAUNDERS: It may be now, but I don't think it was
 17 at the time.
 18 A. I think it was, sir.
 19 SIR JOHN SAUNDERS: It'd be very helpful to have that
 20 identified to me.
 21 A. The advice at the time was if we were to come across
 22 members of the public who were with someone who's
 23 injured we would advise them to move towards a cold. So
 24 we would send them that way. If they refused, clearly
 25 we wouldn't push that, but we would advise them to move

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1 towards the cold zone.
 2 SIR JOHN SAUNDERS: Okay. It'd be really helpful to see
 3 this identified in JOPs 3.
 4 MR GREANEY: Sir, what I'm going to suggest — I'm not going
 5 to put Mr Whittle on the spot now, particularly since
 6 he's a retired officer, but Inspector Lear is coming to
 7 give evidence tomorrow and I can alert him now, if he's
 8 watching, or alert those who are acting on his behalf
 9 that it would be helpful if he were able to assist us
 10 with that issue when he comes to give evidence tomorrow.
 11 SIR JOHN SAUNDERS: Thank you.
 12 MR GREANEY: The email, secondly, that I told you I wanted
 13 to ask you about. This is {INQ100059/1}.
 14 This, I know, is an email that I know has been drawn
 15 to your attention.
 16 A. Yes.
 17 Q. It's an email from Stephen Henderson timed at
 18 08.33 hours on 21 December, sent to you with the subject
 19 "MTFA joint services commanders".
 20 A. Yes.
 21 Q. So this was an email that was addressing the training
 22 that you intended to deliver?
 23 A. It was.
 24 Q. {INQ100059/2}, the second page. You can see that that
 25 email was in fact a response to an email dated the day

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1 before, 20 December, timed at 12.40.
 2 A. Yes.
 3 Q. "Steve..."
 4 First of all, who was and is Stephen Henderson?
 5 A. Yes, that's correct.
 6 Q. Who is that person? His role?
 7 A. He works at force HQ in contingency planning.
 8 Q. "Steve, latest version attached."
 9 So should we understand you were sending a version
 10 of your PowerPoint presentation to him?
 11 A. Yes.
 12 Q. For what purpose?
 13 A. For him to have a look over and provide any feedback.
 14 Q. "These training days will be on..."
 15 And then you give dates in January and February.
 16 A. Yes.
 17 Q. And indicate the training is to be at GMFRS training
 18 school.
 19 A. Yes, that's correct.
 20 Q. "Other tri-service training we have run."
 21 And you then give some dates as well.
 22 Back to page 1, Mr Lopez {INQ100059/1}.
 23 Mr Henderson, from whom we also expect to hear
 24 tomorrow, replied saying he's gone through the
 25 presentation and has just a few minor points to raise.

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1 A. Yes.
 2 Q. You and indeed Mr Henderson have been through the
 3 exercise of trying to work out which version of the
 4 presentation he was looking as, have you not?
 5 A. We have, yes.
 6 Q. And I don't think anyone either as part of our team or
 7 you or Mr Henderson have been able to identify something
 8 which precisely fits .
 9 A. No.
 10 Q. But it is clear that he was talking about an iteration
 11 of your presentation?
 12 A. Most certainly.
 13 Q. "On slide 8, METHANE. JESIP is keen now to use METHANE
 14 as a reporting tool. It doesn't have to be a major
 15 incident. I appreciate that this is unlikely in an MTFA
 16 scenario and you do cover it in slide 9."
 17 A. Yes.
 18 Q. Then:
 19 "I appreciate communications will be a problem but
 20 there are separate interoperable Airwave channels
 21 available to emergency service commanders."
 22 And interoperable Airwave channels is a topic all to
 23 itself, is it not?
 24 A. Yes.
 25 Q. That I don't myself intend to ask you about:

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1 "... available to emergency service commanders. It
 2 may be beneficial for TFC (support) to have access to
 3 these and can be asked for. They are tested weekly."
 4 I should perhaps add that if anyone intends to ask
 5 you about radio channels they should certainly have
 6 regard to the document that I think we have provided to
 7 all core participants that indicates the particular
 8 sensitivities and how they are to refer to them.
 9 "On slide 27 it mentions recording decision-making.
 10 I am not wanting to tie up Airwave space, but these
 11 channels are recorded and could be used in an emergency.
 12 Also we have been sent through the below common issues
 13 that have been highlighted national (I appreciate that
 14 they do not all relate to an MTFA incident).
 15 A. Yes.
 16 Q. He talks about sending through the below common issues
 17 that have been highlighted national or nationally .
 18 A. Yes.
 19 Q. What did you understand he was referring to?
 20 A. So issues that have come in through exercising round the
 21 country, which then forms part of joint organisational
 22 learning .
 23 Q. And indeed, you're quite right, he uses that term:
 24 "Common issues being reported through joint
 25 organisational learning or JOL."

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1 Was JOL something formal?
 2 A. Yes, yes, it was a -- so alongside the JESIP JOPs you
 3 would have the JESIP Doctrine, which updated a lot of
 4 stuff coming through tied into organisational learning
 5 and you also had JESIP News as well, which was
 6 a periodical release .
 7 Q. So then the common issues are identified:
 8 "Issues with the identification of commanders/use of
 9 tabards."
 10 A. Yes.
 11 Q. Is that the simple point that those who are at the scene
 12 ought to know who the commanders are?
 13 A. Absolutely, yes.
 14 Q. And the way that's demonstrated is the wearing of
 15 tabards?
 16 A. It is.
 17 Q. "Lack of communication between commanders, sometimes
 18 despite co-locating"?
 19 A. Yes.
 20 Q. "Not establishing or using a forward command post or
 21 FCP"?
 22 A. Yes.
 23 Q. "Lack of awareness of JESIP and METHANE amongst
 24 first-responder staff resulting in delays with response
 25 and no FCP set up"?

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1 A. Yes.
 2 Q. "Not using METHANE, so passing of incident information
 3 ineffective and delayed"?
 4 A. Yes.
 5 Q. "Major incident declaration. Evidence of not declaring
 6 soon enough is delaying response"?
 7 A. Yes.
 8 Q. "Issues with each service deploying tactical commanders
 9 differently, resulting in confusion around tactical
 10 coordinating groups, TCGs"?
 11 A. Yes.
 12 Q. "Risks not shared with organisations arriving on scene,
 13 so staff placed in danger"?
 14 A. Yes.
 15 Q. "Not using Airwave handsets/Talk Groups with mobile
 16 phones being the default option and therefore poor
 17 reception is cited as a reason for poor communication
 18 between staff"?
 19 A. Yes.
 20 Q. "Lack of a media plan or lead agency for communications
 21 to manage press and social media leading to reputational
 22 risk"?
 23 A. Yes.
 24 Q. And finally:
 25 "Acronym use still an issue, leading to

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1 misunderstanding of information shared at scene and
 2 control rooms”?
 3 A. Yes.
 4 Q. So what we can be very clear about is that, certainly by
 5 December of 2016, each of those matters was identified
 6 as being an issue?
 7 A. Yes.
 8 Q. And were those issues that you were seeking to address
 9 with those who you wanted to attend your training
 10 course?
 11 A. Yes, largely, sir, yes.
 12 Q. Then next, as indicated — I don't want to trawl through
 13 the various changes between different iterations. There
 14 was one that I wanted to raise with you as I indicated
 15 in case it is important, frankly I don't know whether
 16 it is or it isn't. First of all, the diagram we were
 17 looking at earlier, {INQ040316/20}.
 18 There's the diagram. By the time of later
 19 iterations of your PowerPoint presentation, and indeed
 20 one copy of which you located at home, did you not, the
 21 week before last?
 22 A. Yes, that's correct.
 23 Q. Which has handwritten notes upon it?
 24 A. Yes.
 25 Q. So it rather looks, am I right, that that is a version

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1 that you did use to deliver at least some of the
 2 training?
 3 A. Yes.
 4 Q. It seems sensible. You changed the diagram so that
 5 there were two diagrams, did you not, in later
 6 iterations?
 7 A. Yes.
 8 Q. Let's look at how the change was made. {INQ040194/1}.
 9 {INQ040194/20}, first of all, please. There we have
 10 some of the information which is on the earlier diagram
 11 that we have seen, namely the hot zone and the RVP,
 12 although I think the RVP is in a different position.
 13 Then if we go to the next page, {INQ040194/21}. Can
 14 you explain what you were seeking to capture in the
 15 differences between the diagram in the early iteration
 16 and the diagrams in the later iteration, just in case
 17 it is of any importance?
 18 A. Yes. This diagram shows the RVP is obviously much
 19 closer to the intended venue.
 20 Q. Indeed.
 21 A. And what the first diagram immediately shows is that the
 22 firearms officers, denoted by the blue triangles, have
 23 made entry into the actual venue, which is a — that's
 24 a risk assessment to be conducted by the officers as
 25 they attend, so do they feel that they have sufficient

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1 staff to start that immediate identify and locate and
 2 confront, or do they need to wait for further resources
 3 to attend to give them a better tactical advantage.
 4 Obviously, on this occasion it's showing that
 5 they've done that, they've made that entry, leaving the
 6 OFC at the RVP, and then as further resources arrive,
 7 the hot zone is being shrunk, which is creating a better
 8 warm zone for our tri-service partners to work within.
 9 Then the diagram shows the red, green and blue
 10 triangles being deployed into that area, which denotes
 11 the three services working within that warm zone under
 12 a police escort.
 13 Q. Thank you very much. I'm just going to ask that we put
 14 on screen a document. I'm not certain whether this
 15 document relates to the training you delivered in
 16 January and February 2017 or whether it relates to the
 17 training that it was intended should be delivered in
 18 August and September of 2017. So I'm going to ask you
 19 to help.
 20 The reference is {INQ040195/1}. This is a document
 21 that has come to the inquiry very recently, I think
 22 indeed during February, unless I'm wrong.
 23 A. Yes.
 24 Q. Do you recognise this document?
 25 A. I do, yes. That is the trainer notes which would be —

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1 if you ran the earlier presentation on a PowerPoint
 2 format, and you selected the presentation view, these
 3 notes would appear underneath those slides to tell
 4 you —
 5 Q. I thought for a moment I'd misunderstood, but I think
 6 I've understood correctly. These notes go along with
 7 the PowerPoint presentation for delivery in January and
 8 February, so it reflects knowledge, information and
 9 belief that was in existence before the arena attack;
 10 am I correct?
 11 A. Yes.
 12 Q. I just wanted to pull out a couple of passages from
 13 this. First of all, alongside page reference 2, so this
 14 would have been underneath the slide:
 15 "Designed to test our systems in place and ensure
 16 that they function as expected to expeditiously get our
 17 resources on the ground at the scene of an MTFA to
 18 create warm zones, neutralise threats and save life."
 19 Is that correct?
 20 A. Yes.
 21 Q. A little further down that page:
 22 "We will discuss openly how we think specific areas
 23 of the JESIP joint operating principles will be
 24 achieved. When we believe we know, we will arrange
 25 a test date to trial it."

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1 What did you mean by that?
 2 A. In future exercises, so we would -- anything that we
 3 highlighted in this we would work to deal with it and
 4 then we would test it.
 5 Q. And then you say -- and were you responsible for this
 6 text? Did you write this yourself?
 7 A. Yes, I did.
 8 Q. You observe:
 9 "We have one opportunity to get this right and
 10 getting it wrong is not an option."
 11 What did you mean by that?
 12 A. For obvious reasons we must achieve our strategy.
 13 Q. Then page reference 4:
 14 "The need for joint response is not new."
 15 A. No.
 16 Q. "The findings identify by public inquiries and inquests
 17 have highlighted cases where the emergency services
 18 could have worked better together and shown much greater
 19 levels of communication, cooperation and coordination."
 20 A. Yes.
 21 Q. And really, that's one of the things that you were
 22 seeking to avoid by reason of the training that you were
 23 delivering?
 24 A. It was.
 25 Q. Next, page 3 of this document, {INQ040195/3}, to go with

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1 slide 8. In the middle of that page:
 2 "A deeper and wider understanding will only come
 3 from meaningful communication between the emergency
 4 services and other responder agencies."
 5 A. Yes.
 6 Q. Next page, {INQ040195/4}, the bottom of that page,
 7 alongside slide 9:
 8 "When commanders are co-located they can perform the
 9 functions of command, control and coordination face to
 10 face. They should meet as early as possible at
 11 a jointly agreed location at the scene that is known as
 12 the forward command post."
 13 A. Yes.
 14 Q. So these were, among others, very important messages
 15 that you felt it was important to get across, not only
 16 to your police colleagues but also your colleagues
 17 within the other emergency services?
 18 A. Yes, that's correct.
 19 Q. The fifth of the points, still on this training, and I'm
 20 turning now to page 10, paragraph 47 and following of
 21 your witness statement, where you say:
 22 "Although I remember attending the MTFA commander
 23 training sessions, which I presented in January and
 24 February 2017, I cannot recall precisely who attended."
 25 A. No.

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1 Q. "It is fair [you add] to say that in an ideal world
 2 I would have wanted more attendees from GMP commanders
 3 at TFC and SFC level."
 4 A. Yes.
 5 Q. "And in that sense I was to some extent disappointed
 6 that there were not more GMP commanders present."
 7 A. That's correct.
 8 Q. In short, you would have very much wanted a better
 9 attendance?
 10 A. Yes.
 11 Q. Could you force people to attend?
 12 A. No, we couldn't. It was entirely voluntary, their
 13 attendance at the event.
 14 Q. And I think you acknowledge, to be fair to your
 15 colleagues, that it may be that some of the commanders
 16 had operational commitments that clashed with the
 17 training.
 18 A. Very much so, sir, yes.
 19 Q. Although whether they had clashes with the training on
 20 every day that you organised it might be a different
 21 matter.
 22 A. Yes.
 23 Q. Would you bear with me for one moment, please?
 24 (Pause)
 25 Finally, this, please, Mr Whittle. I think you can

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1 confirm that you had no involvement at all in the
 2 initial response to the explosion at the arena on
 3 22 May 2017?
 4 A. No, I didn't, sir.
 5 Q. You were at home, off duty?
 6 A. Yes.
 7 Q. But you did report for duty at 7 am on the morning of
 8 the 23rd?
 9 A. That's correct.
 10 Q. Where you assisted your colleagues with firearms
 11 resource management and the recording of firearms
 12 deployments?
 13 A. Yes, that's correct.
 14 MR GREANEY: Mr Whittle, thank you very much indeed for
 15 answering my questions. There are, as you'll
 16 appreciate, questions to be posed by others.
 17 Sir, I believe that the only core participants who
 18 have submitted Rule 10 requests and who therefore have
 19 permission to ask questions are on behalf of the
 20 families, and Mr Weatherby, I know, will take the lead,
 21 and on behalf of Greater Manchester Police.
 22 Given that Greater Manchester Police represent the
 23 interests of Mr Whittle, I'm going to ask Mr Weatherby
 24 to pose his questions first, please.
 25

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1 Questions from MR WEATHERBY
 2 MR WEATHERBY: Can I have on the screen, please,
 3 {INQ039970/6}. This is the version 5 SOP 47 that we've
 4 already referred to in detail and I promise I won't be
 5 referring to it in detail. It's just a small point.
 6 This may have been read out this morning, but I don't
 7 think it was. It's under paragraph 5, "Actions and
 8 review", and it's the second paragraph underneath that.
 9 It's just the first sentence:
 10 "There is little doubt that the FDO will face
 11 significant challenges as the initial tactical commander
 12 for such an incident."
 13 A. Yes.
 14 Q. You've been asked questions about that, but I just want
 15 to use that as a starting point. That one sentence
 16 in that policy document reflects a reality that was
 17 known to Greater Manchester Police, at least by the time
 18 that document was drafted, but which was never properly
 19 addressed before 22 May, doesn't it?
 20 A. Yes.
 21 Q. In fact, in your policy document of 4 May, again that
 22 we've looked at quite extensively and I won't, as
 23 we have seen, that policy document made the FDO's tasks
 24 considerably longer?
 25 A. It does.

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1 Q. As I have understood your evidence this morning and this
 2 afternoon, this overloading of the FDO, in your view,
 3 could have been dealt with by delegation and/or by crib
 4 sheets, your term —
 5 A. Yes.
 6 Q. — and/or by drop—down menus? Have I understood what
 7 you said correctly?
 8 A. Yes, that's correct, sir.
 9 Q. Given that this is an important policy document, it's
 10 right, isn't it, that nowhere is it suggested that these
 11 actions are to be delegated? The policy refers to, in
 12 its heading, "Initial actions by the host force
 13 FIM/FDO".
 14 A. Yes.
 15 Q. There's no reference to delegation, is there?
 16 A. No, there isn't, sir, and the reason for that being
 17 is that it is still that person's responsibility to
 18 ensure those tasks are conducted.
 19 Q. Yes. Given the centrality of the FDO, the FDO is the
 20 centre of the wheel for both Greater Manchester Police
 21 and, frankly, everybody else responding; yes?
 22 A. Without a doubt, yes.
 23 Q. Would it not have been appropriate, assuming delegation
 24 was the answer, to actually spell that out and say, "The
 25 FDO will become overwhelmed unless these tasks are

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1 delegated"?
 2 A. I absolutely agree with your position on that, but
 3 obviously when we create a policy such as that, then
 4 it isn't within the scope of the policy that I'm writing
 5 to say, "And you need to give this to this person, this
 6 to this person". I would expect that to be an internal
 7 matter for the OCB.
 8 Q. Why?
 9 A. Because I don't work in the OCB, I have no understanding
 10 of their command structure, how many people they have on
 11 duty at any one time, who's capable of doing what.
 12 I have no knowledge of that whatsoever, sir.
 13 Q. In this policy, in common with many policies, you do set
 14 out actions and duties which fall to be dealt with by
 15 one level or other of command or particular officers.
 16 Given the centrality of this list of actions, if at the
 17 start of the review you didn't have knowledge or
 18 experience of the OCB, wasn't it your job to in fact
 19 drill into that and, for example, say that the FDO, with
 20 the force duty supervisor, for example, or other named
 21 officers, should undertake the following duties?
 22 A. I don't agree that that would be my job, sir. Certainly
 23 that job should be undertaken by someone, but I am not
 24 OCB staff, I have no knowledge of the OCB whatsoever, so
 25 it would be a pointless task me even attempting to do

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1 something like that.
 2 Q. Well, you could bring in somebody from the OCB or
 3 somebody who has knowledge of that. Presumably you
 4 don't have hands—on knowledge of all the policies that
 5 you've been involved in.
 6 A. No, absolutely.
 7 Q. So is it your position then that any delegation of these
 8 tasks ought to have been via another policy set out by
 9 somebody else in the OCB?
 10 A. I would certainly expect the OCB to allocate tasks or,
 11 should I say, divide up the taskings within OCB
 12 supervision, who could then pass down those tasks in the
 13 beginning that they have received to the people
 14 underneath them.
 15 Q. How was the OCB supposed to know that they were to
 16 delegate these tasks to various officers or commanders
 17 or managers? How were they supposed to know that?
 18 A. There is nothing within my policy to advise that at all,
 19 sir, so that is certainly a gap within my policy. But
 20 certainly I don't think anybody would ever expect
 21 a single person to undertake all of that role. It would
 22 be impossible.
 23 Q. Yes. Well, we'll hear evidence about what actually
 24 happened, but the overwhelming of the FDO was
 25 a well—known problem within GMP and —

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1 A. And countrywide, sir, yes.
 2 Q. And contributed to, not mitigated by, this new policy
 3 that you'd provided. You'd made the position worse by
 4 loading further actions on to the FDO.
 5 A. Right, well, I do accept that, sir. All I can offer is,
 6 as I've said before, that was never my intention.
 7 Q. I'll move on in a moment. That's a very fair concession
 8 by you. But the position is, of course, that the FDO is
 9 the initial tactical and strategic commander --
 10 A. Most certainly.
 11 Q. -- before the command structure is delegated.
 12 A. Yes.
 13 Q. They are responsible for managing, appointing and
 14 managing the OFC?
 15 A. Yes.
 16 Q. Marshalling all of the ARVs?
 17 A. Yes.
 18 Q. Contacting other forces to bring further armed assets
 19 in?
 20 A. Yes.
 21 Q. Appointing an unarmed operational commander at the
 22 scene?
 23 A. Yes.
 24 Q. Briefing the unarmed officers, some of whom are to be
 25 presumed to be in danger, as they are likely to be

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1 at the scene?
 2 A. Yes.
 3 Q. Contacting and having ongoing communications with both
 4 of the other main responders?
 5 A. Yes.
 6 Q. Contacting counter-terrorism police nationally?
 7 A. Yes.
 8 Q. Contacting the OFCT Home Office. It's an enormous task.
 9 It's not just a bit of overloading or bit of
 10 a challenge, these are overwhelming.
 11 A. It is. And I described it as a tidal wave and I think
 12 that's very accurate.
 13 SIR JOHN SAUNDERS: Can I interrupt for a moment? So
 14 everybody knew or everybody who mattered knew that this
 15 position was true for the FDO?
 16 A. Yes.
 17 SIR JOHN SAUNDERS: And then if it happened in real life, it
 18 just couldn't work effectively unless that delegation
 19 had taken place?
 20 A. Exactly, sir yes.
 21 SIR JOHN SAUNDERS: So can you give me any idea why this
 22 problem, known about for some time, had not been
 23 addressed, or is it simply an attitude: well, it's never
 24 going to happen for real with us?
 25 A. Absolutely not, in fact.

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1 SIR JOHN SAUNDERS: You say that, but it's quite difficult
 2 to think of any other explanation, isn't it?
 3 A. Yes, and I do see where you're coming from on that, sir,
 4 but I never took the view that this was never going to
 5 happen to us at all. In fact, I opened most of my
 6 presentations with, "This isn't a matter of when, it's
 7 a matter of where", but it was obviously going to occur,
 8 it's just whether it's going to happen on our patch or
 9 on someone else's, because that's just the pace of
 10 things that were occurring. As I say, sir, I'm not OCB,
 11 I don't deal with force resourcing, I don't have any
 12 impact whatsoever on how many tactical firearms
 13 commanders the Operational Communications Bureau have or
 14 how many staff they have. That is decisions way beyond
 15 my pay scale, unfortunately.
 16 SIR JOHN SAUNDERS: Thank you.
 17 Mr Weatherby, sorry to interrupt.
 18 MR WEATHERBY: This is the problem that had been identified
 19 in Winchester Accord. It had been identified in
 20 version 5 of the policy that we've just referred to. It
 21 had been identified in the HMIC review in October and
 22 November. Chief Inspector Thomas has given evidence
 23 that it was well-known as a problem in Greater
 24 Manchester Police. You rewrote the policy on 4 May.
 25 That was the opportunity to take the bull by the horns

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1 and to deal with it, wasn't it?
 2 A. Yes, I do accept that, sir, yes.
 3 Q. Too many duties on one officer, the policy should have
 4 recognised that, and it should have made it clear that
 5 whoever had responsibility for those actions, they
 6 couldn't be dealt with by one person and a structure had
 7 to be ready made, and via policy, your policy or
 8 a further policy, to make sure that all of those actions
 9 happened and happened urgently?
 10 A. Yes.
 11 Q. You've referred to crib sheets.
 12 A. Yes.
 13 Q. A crib sheet, I assume, is somebody's note of the
 14 policy, trying to take their own view of what was
 15 important or a list out of the policy? It's not in any
 16 way a substitution for the policy, is it?
 17 A. No, it's not, sir. It is obviously a step-by-step guide
 18 created by the commander to aid the memory, to make sure
 19 they don't miss anything.
 20 Q. Many of us do lists for all sorts of things in our
 21 lives, but these are matters which are absolutely
 22 crucial to safeguarding life.
 23 A. Yes, of course.
 24 Q. And the idea of leaving it to the individual crib sheets
 25 of commanders is an unfortunate way of looking at it,

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1 isn't it?
 2 A. As I said, though, I had created one at appendix D.
 3 That's what that was for.
 4 Q. I see. In respect of drop-down menus and action cards,
 5 drop-down menus is something that refers to something on
 6 a computer?
 7 A. Yes.
 8 Q. And action cards, we have heard about in other respects,
 9 they are official crib sheets, if you like, they're
 10 summaries of the policy to be used in the moment; yes?
 11 A. Okay.
 12 Q. And they're a good idea and often used for translating
 13 complicated policies into pragmatic actions in the
 14 moment? Is that a fair way of putting it?
 15 A. Yes, it's a very good way of putting it, yes.
 16 Q. Am I correct that it was in July when there was the
 17 assurance visits and further review of the policies
 18 after the bombing that certainly the action cards, they
 19 were still under development at that time?
 20 A. That is a matter for the OCB, sir. Unfortunately,
 21 I don't work with the OCB. So them creating their
 22 action cards is nothing to do with me at all.
 23 Q. Certainly so far as you're concerned, and you've
 24 referred to the appendix to your policy and I follow
 25 that, but apart from that, as far as you're aware, no

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1 drop-down menus or action cards applicable to these
 2 Plato policies at all at 22 May?
 3 A. I couldn't tell you, sir, I'm not OCB.
 4 Q. Right. Thank you.
 5 Moving on, I want to deal with version 5. It was
 6 dealt with rather quickly earlier, no criticism of that.
 7 But in your first statement you said that you thought
 8 that SOP 47 had been superseded in 2014 by an earlier
 9 version of the document that you subsequently reviewed
 10 for your 4 May policy.
 11 A. Yes.
 12 Q. Is that a fair way of putting it? And then in a second
 13 short statement you were asked to clarify, I think, what
 14 documents were the basis for your new policy, and
 15 in that second statement you asserted that it was based
 16 on version 1.10 of the NWAPC document; is that right?
 17 A. Yes, that's correct.
 18 Q. So up to that point, no mention of SOP 47 being in force
 19 and no correction of your first statement. It was only
 20 in the third statement, which I think you made last
 21 week, when you were prompted by a lot of further
 22 information, that you indicated that you had made an
 23 error and that version 5 was in force until 4 May. Then
 24 you went on to say that you were in fact at the time
 25 aware of it. Is that a fair summary?

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1 A. Yes.
 2 Q. Are you sure about that, that you were aware of
 3 version 5 of SOP 47 when you reviewed version 2, or is
 4 this hindsight thinking?
 5 A. No, it's based on the fact that the dates of that
 6 document are obvious that that would have been the
 7 document that I'd had access to at that moment in time,
 8 as is exactly the same with version 1.10.
 9 Q. Well, I'm not for a moment quibbling with the fact that
 10 version 1.10 was what you based version 2 on, that's
 11 clear from the face of the document, but is there any
 12 documentation at all which has prompted you, which
 13 refers to you looking at SOP 47 version 5 in respect of
 14 your review? For example, an email from Inspector Lear
 15 asking you to amalgamate the NWAPC and GMP policies.
 16 A. No. The decision to write it from the version 1.10 was
 17 a discussion that I believe myself and Mr Lear had, and
 18 that document, the 1.10 would appear to be the obvious
 19 version to do that from.
 20 Q. Yes. As I say, it plainly is that you worked off 1.10.
 21 What I'm trying to explore with you is whether in fact
 22 you did know that SOP 47 version 5 was in force or even
 23 in existence at the time. You've told us that you
 24 weren't aware of the HMIC review of version 5 at the
 25 time.

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1 A. No. No, I wasn't.
 2 Q. Maybe you can't answer this, but are you aware why you
 3 weren't aware of that?
 4 A. I don't know, sir. Perhaps the people who were aware of
 5 that didn't think that I needed to know.
 6 Q. Okay, but Mr Giladi, the line manager of Inspector Lear,
 7 Inspector Lear asking you to rewrite the Plato policy
 8 for GMP, and what I think you just said, you and
 9 Inspector Lear discussing the amalgamation of two
 10 policies. Surely during those discussions the recent
 11 review of HMIC would have come up?
 12 A. If it did, I don't recall it, sir.
 13 Q. You get my point though that the review of HMIC, which
 14 is helpful in terms of version 5 and what needed to
 15 change, anybody asking you to review Plato policy who
 16 was aware of that would obviously bring it to your
 17 attention, wouldn't they?
 18 A. As I say, sir, I don't recall that happening. I was
 19 just identified as being the best person to review the
 20 document and amalgamate the latest version of the NCTP
 21 advice to forces on MTFA planning.
 22 Q. No audit trail of any request for you to do this or how
 23 to do it involving version 5?
 24 A. Not that I recall, sir, no.
 25 Q. With respect to the Inspectorate review in

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1 October/November, you would have been aware that they
 2 were doing that; is that right?
 3 A. Again, I don't recall it.
 4 Q. But you're in the policy and compliance unit. This
 5 should have been very much the sort of thing that you
 6 would be interested in because it would inform your
 7 work, surely?
 8 A. Absolutely. All I can say, sir, is that I don't recall
 9 it. That may be -- if I had access to my email system
 10 from years ago before I retired, I'd be able to be
 11 more --
 12 Q. Maybe somebody will do that. But in terms of the
 13 learning from HMIC, isn't it common sense that where
 14 HMIC comes in and reviews with a view to improving or
 15 helping GMP improve its policies, those reviews would
 16 come through to the policy and compliance unit? Isn't
 17 that a matter of common sense?
 18 A. Yes, it is, sir.
 19 Q. And do you not recall seeing the fruits of the
 20 Inspectorate?
 21 A. (Inaudible: distorted).
 22 Q. We are told, we understand, that your 4 May document
 23 superseded version 5. Can you help us as to
 24 documentation which told commanders, those who were to
 25 operate the policies, that it had been superseded and

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1 replaced by the policy version 2 that you wrote on
 2 4 May?
 3 A. That wasn't my understanding, sir. My understanding
 4 at the time was that I was replacing the version 1.10 of
 5 the appendix C, which obviously still ran alongside
 6 version 5.
 7 Q. Oh, I see. I thought we'd just considered that
 8 together. I thought you said that Mr Lear had
 9 (overspeaking) amalgamate the two?
 10 A. (Inaudible: distorted) but at that time, in my initial
 11 review of the 4 May document, that was just
 12 a replacement for the appendix C.
 13 Q. So no discussion with Mr Lear about replacing version 5
 14 SOP 47?
 15 A. Not that I had with him that I recall.
 16 Q. Amalgamating them?
 17 A. Again, not that I recall. I think that certainly did
 18 occur later in the version in July because obviously it
 19 then becomes a local procedure document rather than a --
 20 Q. I see -- sorry, I cut across you.
 21 A. At that time I think it then becomes a local procedure
 22 document rather than appendix C.
 23 Q. We'll come to that in due course, but I must have
 24 misunderstood you. Your understanding was that your
 25 rewrite on 4 May was replacing the NWAPC document, but

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1 it wasn't superseding the version 5 document?
 2 A. That was my understanding, yes.
 3 Q. So your understanding was that they had co--existed
 4 previously, version 5 of SOP 47 and version 1.10 of the
 5 NWAPC, they'd co--existed, even though they substantially
 6 overlapped, and your understanding was that you were not
 7 altering or superseding SOP 47 version 5, you were
 8 simply amending the NWAPC policy that was to be operated
 9 concurrently?
 10 A. Yes.
 11 SIR JOHN SAUNDERS: Did the other forces know that you were
 12 doing that amendment?
 13 A. I don't recall whether they did. I suspect they may not
 14 have, sir, because when we sent it there, when
 15 I initially sent it to Mr Lear, I sent it -- in fact,
 16 they may have been, actually, because when I sent it to
 17 Mr Lear, I also sent it to the CFI, so it would be
 18 a strange thing for me to do to just, out of the blue,
 19 send him a new document. Perhaps they did, I don't
 20 recall.
 21 MR WEATHERBY: Of course we've established already that the
 22 other five forces didn't adopt your rewrite, I think
 23 because it was too complicated. That was the reason
 24 that was given, yes?
 25 A. Yes. I don't recall the exact -- certainly they weren't

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1 ready for it.
 2 Q. Yes, and then that's why in July it became, even though
 3 it was badged as a NWAPC document, it never was, it was
 4 a GMP document and then it was simply a GMP document
 5 when it was reviewed in July. So your understanding
 6 then that version 5 SOP 47 continued would then be an
 7 explanation, would it not, as to why it wouldn't be
 8 a surprise to you on the email that disseminated your
 9 policy there was no mention of it superseding version 5?
 10 A. Yes, I'd agree with that.
 11 Q. Therefore you and presumably all the people it went to
 12 would think that version 5 simply remained in force?
 13 A. That's my understanding, sir, yes.
 14 Q. And therefore there were two overlapping policies and no
 15 guidance about which one should be operated?
 16 A. The position actually remained unchanged because it was
 17 still appendix C of the cross boundary --
 18 Q. I'm not going to go back to the documents because
 19 I don't want to take up the time as we've looked at them
 20 in some detail. Both of them deal with initial actions
 21 by the FDO, don't they?
 22 A. They do.
 23 Q. Which of those policies was the FDO to follow on the
 24 night of 22 May?
 25 A. As I've indicated before, if Mr Sexton had had the

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1 opportunity to examine that document and fully
 2 understand it and wanted to use it, I would expect him
 3 to use that one. But —
 4 Q. Your document?
 5 A. Yes.
 6 Q. Okay. Where is the instruction to him to do that?
 7 A. The only instruction really came from Mr Lear sending
 8 that out to everyone.
 9 Q. Yes. And as you just agreed, neither you nor the
 10 commanders were told that in fact SOP 47 version 5 had
 11 been superseded?
 12 A. No, that's correct.
 13 Q. So Mr Sexton is left in the position where he's not got
 14 the time to read the new version, he's not told to apply
 15 that list of his actions rather than the version 5 list
 16 of actions, he's not received any training on it?
 17 A. That's correct.
 18 Q. So he's free to choose, is he, which list he follows?
 19 A. At that moment in time, that's probably all that he
 20 could possibly do in such a position that he found
 21 himself in.
 22 Q. Is that an acceptable way for a policy as central to
 23 safeguarding life as this to operate?
 24 A. I think it's a very unfortunate set of timings, sir,
 25 that the document was sent out and within a very short

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1 space of time, before we've had the chance to properly
 2 understand and make sure everybody's fully au fait with
 3 this, that this attack occurred.
 4 Q. I'll come back to process in a moment, but I'm
 5 suggesting to you that, in a policy which is so central
 6 as this one, to have two options and for the person
 7 that's supposed to be operating it not to be told one
 8 has superseded the other or to be told when one comes
 9 into force and the other one stops is simply
 10 unacceptable; am I right?
 11 A. Yes, I do agree with that, yes.
 12 Q. Thank you. I'll come back to process in a minute. The
 13 process most certainly isn't your fault, so please don't
 14 take what I'm going to say as criticism of you.
 15 Before I do that, you've been asked about the
 16 Ian Terry tragedy in 2008. But it's right, isn't it,
 17 that Greater Manchester Police firearms officers were
 18 also involved in another tragedy in 2012, with the
 19 shooting of Anthony Grainger?
 20 A. Yes, that's correct.
 21 Q. I'm only going to — I'm not going to deal with this at
 22 all, I just want to raise one point about it. It's
 23 right, isn't it, that Greater Manchester Police first of
 24 all were prosecuted in respect of that but the
 25 prosecution didn't proceed due to legal reasons?

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1 A. I don't know the reasons, sir. I know it didn't
 2 (inaudible: distorted).
 3 Q. Greater Manchester Police were subject to strong
 4 criticism with respect to the firearms operation,
 5 amongst other things, in the subsequent public inquiry
 6 report; that's right, isn't it?
 7 A. Yes.
 8 Q. So although the shooting was in 2012, the close scrutiny
 9 of Greater Manchester Police firearms policies and
 10 operations continued until the report, which was in
 11 2019, as it happens; that's right, isn't it?
 12 A. Yes.
 13 Q. So both the Terry and the Grainger tragedies were
 14 matters that weighed heavily on Greater Manchester
 15 Police management policy—making and the firearms
 16 sections of it through the whole of that period?
 17 A. Yes.
 18 Q. Would you agree that both of those tragedies should have
 19 led to Greater Manchester Police having the clearest of
 20 policies, properly trained, by 22 May 2017 with respect
 21 to decisive action and matters such as we're considering
 22 here?
 23 A. I think there's almost two separate questions on that
 24 one, sir, because obviously the information that we got
 25 through for us to amend our plans came through in March.

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1 Obviously the timescale for us to do that, get that
 2 policy in, get people trained and get it operational,
 3 would be incredibly short. I think we did what we
 4 possibly could in a very short space of time.
 5 Q. I'm not going to put the question again, but not to put
 6 too fine a point on it, we're dealing with policies here
 7 which address the use of lethal force on the one hand by
 8 police officers, and, on the other hand, the protection
 9 of life of members of the public, police officers and
 10 other services' responders; that's right, isn't it?
 11 A. Yes.
 12 Q. And there's no room for misunderstandings or doubts or
 13 overloading of responsibilities, is there?
 14 A. Again, I would have to fully understand what you mean by
 15 overloading of responsibilities. If you are referring
 16 to the FDO, then as I have indicated before, sir, I am
 17 not OCB and I would expect that those duties would be
 18 given to other people.
 19 Q. Changing topic a little, the policy and compliance unit,
 20 that entails the writing and reviewing of policies, but
 21 what about the compliance bit? Are you supposed to
 22 monitor the efficacy of policies that have been reviewed
 23 and rewritten from your unit?
 24 A. Yes.
 25 Q. Is that part of its task?

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1 A. I'm sorry, you broke up at the end there, sir.
 2 Q. That's part of your tasks as the ---
 3 A. Yes.
 4 Q. It was part of your tasks. And once you'd authored or
 5 amended or looked at the compliance of policies, you
 6 would then pass the reviewed policies up to, first of
 7 all, Mr Lear?
 8 A. Yes.
 9 Q. And then he would presumably take control of the
 10 approval and implementation of them; is that right?
 11 A. Yes.
 12 Q. Are you able to help us with that process? If you're
 13 not, please tell me and I'll ask somebody else. Once
 14 you'd finished reviewing or amending a particular
 15 policy, you would email it or give it to Inspector Lear;
 16 yes?
 17 A. Yes.
 18 Q. And that reviewed policy, as we have seen, would include
 19 a review date when the document had been reviewed and
 20 you'd use techniques such as different coloured text to
 21 show what you'd changed?
 22 A. Yes. That's correct.
 23 Q. Then on occasion, generally, he might come back to you
 24 with queries or to discuss with you implementation,
 25 training?

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1 A. Certainly if he had any queries in relation to the
 2 wording then, yes, I would expect him to come back to
 3 me.
 4 Q. And in terms of approval, are you able to help us with
 5 how that, by way of process, should have been done?
 6 A. No, I'm not, sir. That's obviously a matter for
 7 Inspector Lear and Mr Giladi. Once I have sent it to
 8 them, they take it wherever. I believe that Mr Giladi
 9 was taking it to the Chief Officer Group, but I have
 10 no ---
 11 Q. Okay. I can ask Mr Lear about that tomorrow then.
 12 As far as you understand it, commanders and other
 13 relevant officers wouldn't receive newly reviewed
 14 amended policies until they're approved, would they?
 15 A. No.
 16 Q. Was there a process of consultation like there are in
 17 many other areas in Greater Manchester Police? Would
 18 policies ever be sent out for consultation amongst
 19 officers?
 20 A. I don't ever recall that occurring. Obviously, once
 21 a policy does go out, it does become live, and if people
 22 do have feedback for us then clearly that feedback ---
 23 Q. It can be reviewed again. Once approved, does it
 24 automatically replace the old version of a policy or is
 25 there generally a period for roll-out and training?

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1 A. No, generally, as soon as it's approved, it would
 2 replace the previous iteration.
 3 Q. You've explained the 10% part of it, that you can have
 4 minor amendments to a policy, but then you have the
 5 rewrites of policies. The rewrite of policy, almost by
 6 definition, assumes that something significant has
 7 changed?
 8 A. Yes.
 9 Q. And if something significant has changed, then there has
 10 to be a roll-out, doesn't there, there has to be
 11 training?
 12 A. Yes, I would absolutely agree with that, and obviously
 13 Mr Lear had planned the sessions which we've discussed
 14 already.
 15 Q. Inspector Lear, I anticipate tomorrow, is going to tell
 16 us that in fact your policy actually superseded SOP 47
 17 and in fact, according to the legend on the top of the
 18 disclosed policy, Greater Manchester Police have
 19 confirmed that your policy was the one that was in force
 20 on 22 May. So that leaves a hole, doesn't it, in the
 21 policy between the policy that presumably is known and
 22 should have been trained upon, the old policy if you
 23 like, and the new policy that superseded it, but before
 24 there's been any training or even, frankly, before
 25 people have had time to read it? Isn't there a problem

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1 with that?
 2 A. I don't really think there's any other way to do it
 3 because once a policy is written, it is then obviously
 4 sent out.
 5 SIR JOHN SAUNDERS: Well, isn't there? Don't you say: here
 6 is the new policy, this will be implemented on this
 7 particular day, before that date you will have to have
 8 read it and we'll arrange training? I just think with
 9 a major change that's what you might expect people to
 10 do.
 11 A. That is an option, sir, yes.
 12 SIR JOHN SAUNDERS: Okay, thank you.
 13 MR WEATHERBY: That's one of the times where you have
 14 anticipated the question, sir, and I'm grateful for
 15 that.
 16 In terms of the real example of your policy then, as
 17 far as you're concerned, that became operable as soon as
 18 it was sent out on the 12 May email; is that right?
 19 A. Yes.
 20 Q. But as you told us earlier, your presumption was that it
 21 was concurrently in force with the old policy?
 22 A. With the version 5, yes, SOP, yes.
 23 Q. I think you've confirmed to us, but it wasn't entirely
 24 clear to me, you obviously know the individuals, but the
 25 12 May email went out to armed commanders; is that

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1 right?
 2 A. I don't recall armed commanders, sir, no.
 3 SIR JOHN SAUNDERS: Do you want it put up again?
 4 A. If you could, sir.
 5 SIR JOHN SAUNDERS: Do we have an INQ number?
 6 MR WEATHERBY: I haven't got it to hand.
 7 SIR JOHN SAUNDERS: We'll find it or someone will find it.
 8 (Pause)
 9 MR WEATHERBY: I can come back and deal with it later.
 10 I can probably deal with it with Mr Lear.
 11 In general terms then, rather than referring to the
 12 actual email, have I misunderstood your evidence that it
 13 was firearms commanders that it was disseminated to on
 14 12 May? It was ACC, SFC, TFC, OFC, TAC.
 15 A. Yes.
 16 Q. Was there anybody else it was disseminated to that
 17 you're aware of?
 18 A. Without seeing the email, sir, I couldn't really say.
 19 Q. Fair enough. One thing we haven't covered is that in
 20 fact the version that was attached to that email, and
 21 again we can get this from a different witness, but the
 22 actual attachment of your document, I would just like
 23 the first page up on screen. It is {INQ039968/1}.
 24 MR GREANEY: I don't know whether Mr Weatherby would like to
 25 go to the email of 12 May first. I do have the INQ

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1 reference if that's helpful, but I'm in his hands.
 2 MR WEATHERBY: That would be very helpful indeed.
 3 MR GREANEY: Mr Lopez, the email of Mr Lear of 12 May is
 4 {INQ039966/1}.
 5 MR WEATHERBY: When it comes up, will you just have a look
 6 at the recipient list?
 7 A. Of course.
 8 Q. Has it gone out to firearms commanders or those who
 9 would take firearms command? So are the FDOs included?
 10 A. Yes, it has. So the OCR would be the FDOs. Force
 11 specialist cadre would be the cadre TFCs, and then
 12 you've got your OFCs after that, sir.
 13 Q. So am I right, it wasn't disseminated to non-firearms
 14 commanders or senior officers?
 15 A. From that, it would appear -- yes, as far as I'm aware,
 16 yes.
 17 Q. Are you aware -- and again if you're not aware, just
 18 say -- we can take that document down, thanks -- would
 19 there be any reason for that?
 20 A. Any reason for what, sir?
 21 Q. Not being disseminated to non-firearms commanders.
 22 A. Um... Just because, I suppose -- I mean it's probably
 23 a question for Mr Lear to answer, but --
 24 Q. I'll put it to him then. Before I move on from that,
 25 the point I'm putting to you is that of course

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1 (overspeaking). I'm sorry, I missed that.
 2 SIR JOHN SAUNDERS: You were talking across each other.
 3 I was just explaining to the witness what you'd said,
 4 but let's go on, thank you.
 5 MR WEATHERBY: That's my fault for talking across you, I'm
 6 sorry.
 7 SIR JOHN SAUNDERS: It happens with this system. It's
 8 inevitable.
 9 MR WEATHERBY: Indeed.
 10 In terms of your policy, the policy that you
 11 drafted, of course it applied to unarmed police
 12 responders as well, quite importantly.
 13 A. Yes.
 14 Q. Would you agree that it should be disseminated and
 15 trained to unarmed parts of Greater Manchester Police?
 16 A. No, I wouldn't, sir, no. Obviously, we have levels of
 17 security clearance which are important that -- obviously
 18 we wouldn't send it to everybody. But certainly the
 19 guidance within that -- the guidance we're referring to
 20 is Stay Safe, that was a document which was available to
 21 unarmed staff.
 22 Q. Yes. It's a bit more than just Stay Safe, though, isn't
 23 it? The briefing for unarmed officers includes quite
 24 a bit more than that in terms of situational awareness,
 25 for example, and public safety.

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1 A. Yes, it does.
 2 Q. So your view is that it should be -- I'm not suggesting
 3 here there should be a published document or certainly
 4 not at the moment, but in terms of within Greater
 5 Manchester Police your view is that that should not be
 6 disseminated beyond firearms commanders?
 7 A. The whole document? Absolutely not.
 8 Q. Let me just return to the point I was going to move on
 9 to. That's {INQ039968/1}. Can we have the first page
 10 of that on screen?
 11 MR GREANEY: Mr Weatherby, could I ask you whether this
 12 would be a convenient moment for a short break.
 13 MR WEATHERBY: Can I deal with this one point and then
 14 it would? This is the actual copy of the attachment to
 15 the 12 May document.
 16 A. Yes.
 17 Q. And you can see, there's a rather important message
 18 across it.
 19 A. Yes.
 20 Q. Would you agree that being disseminated in this way with
 21 the word "draft" on it also tends to suggest to
 22 commanders that it's not in fact in force from 12 May?
 23 A. Yes, I will concede that, sir, yes.
 24 MR WEATHERBY: Yes. That would be a convenient moment if
 25 there is to be a break.

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1 SIR JOHN SAUNDERS: Ten minutes; is that all right by
 2 everybody? Thank you.
 3 (4.03 pm)
 4 (A short break)
 5 (4.13 pm)
 6 MR GREANEY: Mr Weatherby has been good enough to indicate
 7 to me that he thinks he'll be something in the order of
 8 20 further minutes. Mr Horwell recently thought he
 9 would be 5 or 10 minutes. So it seems, sir, if we sit
 10 until 5 pm, we will be able to conclude this witness's
 11 evidence.
 12 SIR JOHN SAUNDERS: Thank you.
 13 Mr Weatherby.
 14 MR WEATHERBY: Thank you very much.
 15 I was dealing with you, Mr Whittle, about the
 16 dissemination and in principle who should see and be
 17 trained on Plato policies .
 18 A. Yes.
 19 Q. It's mandatory under the policy that you drafted that
 20 the declaration of Plato must be shared as soon as
 21 practically possible with other relevant agencies, isn't
 22 it?
 23 A. Yes.
 24 Q. There's no equivocation about that for very obvious and
 25 good reasons?

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1 A. Yes.
 2 Q. The other key agencies must be told as soon as possible?
 3 A. Yes.
 4 Q. And likewise, unarmed officers must be brought into the
 5 picture urgently as well?
 6 A. Yes.
 7 Q. Should it not then be the case that those partner
 8 agencies and unarmed officers, at least at a high level,
 9 should be aware of the GMP Plato policy?
 10 A. That would be a decision beyond my understanding, sir.
 11 I don't get involved in policies at that level.
 12 Q. Okay. Well, in that case I'll move on, but it is
 13 a connected point. I'll deal with it swiftly in view of
 14 that answer. Could we have up {INQ035779/1}, please.
 15 Can I stress this is not your document and you've
 16 told us that you weren't aware of the HMIC review. But
 17 it illustrates the point that I'm trying to make at the
 18 moment, so that's why I'm showing it to you for your
 19 comment.
 20 The HMIC review, this is the note of the debrief on
 21 4 November, not the 3rd, as it says on it, it deals with
 22 the FDO, but then it deals with OCB:
 23 "Staff unsure about what their exact role is. Is
 24 there any guidance in OCB about specific MTFA
 25 [presumably] policy?"

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1 A. Yes.
 2 Q. It deals with other matters. Then it says:
 3 "Plato, but it's restricted. How do people get the
 4 plan? Mobile Sherlock. Unarmed staff. What do they
 5 do? Priorities ."
 6 A. Yes.
 7 Q. That's all I need from that document. So we can take it
 8 down, thanks very much.
 9 I'm showing it to you because that was what was
 10 apparently brought to Greater Manchester Police senior
 11 officers' attention from the review in November --
 12 A. Yes.
 13 Q. -- about the problems with the lack of information for
 14 OCB and unarmed staff in particular. Would you agree
 15 that that raises the importance of the policy either
 16 being provided to them or training being provided to
 17 them or some kind of summarised policy being provided so
 18 they can undertake their roles appropriately?
 19 A. Whose notes were they, sir, that I have just viewed?
 20 Q. They were GMP's notes of the HMIC debrief on 4 November.
 21 A. Yes, so that certainly indicates that GMP are aware of
 22 that, yes.
 23 Q. But my point is, from the point of view of you as the
 24 person who's writing the policy, if that had been
 25 brought to your attention you'd have addressed that

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1 in the rewrite, wouldn't you?
 2 A. I don't think I would have addressed that specifically
 3 in my rewrite, no, sir. My rewrite was clearly intended
 4 for firearms command. I would certainly have expected
 5 something to have been created which would have
 6 addressed those issues, yes.
 7 Q. Yes. So if you'd been aware of that, then you'd have
 8 said to Mr Lear, for example, "We must address this or
 9 somebody must address this because this is obviously
 10 a problem that's been brought to our attention"? It's
 11 an important problem, isn't it?
 12 A. It is. Now, whether I would have discussed that with
 13 Mr Lear, because obviously that appears to be a document
 14 that's already held by someone within GMP command who's
 15 been privy to the HMIC inspection, so whether I would
 16 have had a discussion with Mr Lear about that at my
 17 level, I find very doubtful.
 18 Q. Fair enough, I'll move on. Can I ask you just to
 19 clarify from -- I think the convenient place is
 20 appendix D of your version 2, so it's {INQ029178/13}.
 21 The quick time actions. The OFC is appointed from
 22 the deploying armed officers; is that right?
 23 A. Yes, it is, sir.
 24 Q. Then am I right that part of the OFC's role is to set up
 25 a forward command post?

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1 A. Not necessarily OFC at that point. I would expect the
 2 OFC at that point to still be working from the RVP, so
 3 the rendezvous point. And the FCP -- once people had
 4 gathered and once we'd managed to undertake some
 5 important work, we would then consider moving to FCP.
 6 At that very early stage, I think they would still be at
 7 RVP.
 8 Q. That's very helpful. The last line of that page:
 9 "OFC to remain at the RVP/FCP until relieved by
 10 ground--assigned TFC."
 11 A. Yes.
 12 Q. So the RVP would be set by whom?
 13 A. Generally, that would be the tactical firearms
 14 commander, so the initial tactical firearms commander on
 15 receipt of the information coming in would identify what
 16 they would consider to be a safe RVP and they would
 17 nominate that, which is why --
 18 Q. So the FDO sets the RVP and the OFC's job is to go to
 19 the RVP and to stay there unless he or she sets up
 20 an FCP, but stay at one or the other until relieved by
 21 the ground--assigned TFC?
 22 A. Yes.
 23 Q. So the OFC's role is to command the operation on the
 24 ground at that early stage from arrival but from
 25 a command post, whether it's an RVP or an FCP?

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1 A. Yes, that's correct.
 2 Q. Then the FDO appoints a Bronze commander for the unarmed
 3 response; is that right?
 4 A. Yes. So the unarmed officers would then have their
 5 commander as well as the armed officers having their own
 6 separate commander.
 7 Q. So you have an OFC who's commanding the armed response
 8 and you have an unarmed Bronze commander who commands
 9 the unarmed operational officers on the scene or
 10 arriving on scene; yes?
 11 A. Yes.
 12 Q. Then a ground--assigned TFC was to be deployed. Can you
 13 help us with this? The ground--assigned TFC is contacted
 14 and deployed by the FDO under the policy; is that right?
 15 A. That's correct, yes.
 16 Q. As we've just seen, it was the ground--assigned TFC's
 17 role to take over the RVP or forward command post and to
 18 liaise with commanders from other partner agencies?
 19 A. Yes.
 20 Q. Under the policy, what about an unarmed tactical
 21 commander at the scene? Is that a requirement? It's
 22 not clear to me.
 23 A. I don't recall having read that, sir.
 24 SIR JOHN SAUNDERS: Is that different from
 25 a Bronze commander?

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1 A. I think the point Mr Weatherby is making is whether the
 2 unarmed Bronze on the ground commanding the officers on
 3 the ground, whether they would have a supervisory
 4 Silver commander at the FCP. I think that's the point
 5 you're making, isn't it, Mr Weatherby?
 6 MR WEATHERBY: It's your rewritten policy. I'm trying to
 7 ascertain from you exactly which commanders should be
 8 where. I've dealt with the OFC being at the command
 9 post, whether it is FCP or RVP, until the
 10 ground--assigned armed Silver takes over and we've dealt
 11 with the Bronze unarmed. Now it's not clear to me on
 12 the policy whether there should be an unarmed Silver
 13 tactical commander at the scene. Is that a requirement?
 14 A. Certainly there would be a Silver commander. Whether or
 15 not they should locate themselves at FCP, I don't
 16 recall.
 17 Q. Right. Let me put it a different way: under this
 18 policy, under your rewritten version, 4 May, was the
 19 ground--assigned TFC required to tactically command all
 20 of the police at the scene or just the armed officers
 21 at the scene?
 22 A. Just the armed officers, sir.
 23 Q. Just the armed officers?
 24 A. Yes.
 25 Q. Are you able to point us to where in the policy that's

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1 made clear?
 2 A. I don't think I would be, no.
 3 Q. Thank you.
 4 A. But that is obviously the tactical firearms commander's
 5 role, to command officers on the ground or command the
 6 resources available to them under the OFC.
 7 Q. Right, but only the armed officers?
 8 A. From recollection.
 9 Q. Well, it's an important point.
 10 A. From recollection.
 11 Q. But it's an important point. I don't precisely know the
 12 figures, but there's a large number of armed officers
 13 who arrived on scene. And equally there are a large
 14 number of unarmed officers doing all sorts of different
 15 tasks. Both administering the scene, investigating the
 16 scene and assisting with casualty removal, et cetera.
 17 So bearing in mind the extent of the police operations,
 18 does that help whether the ground--assigned TFC should
 19 have been in command of all officers or just armed
 20 officers?
 21 A. I can't answer your question, sir, I'm sorry.
 22 Q. Okay. Finally, just moving on to the commander training
 23 in January and February, and Mr Greaney's dealt with
 24 most of this so I shan't repeat what he said, but it's
 25 right, isn't it, that through 2016 there was, first of

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1 all , Winchester Accord and then there was
 2 Exercise Sherman, both of which I think you were aware
 3 of? You were involved in Sherman, I think, but not
 4 Winchester Accord; is that right?
 5 A. Yes, several Operation Shermans.
 6 Q. The joint commander training was the result of
 7 identified failings in those exercises, is that right,
 8 to do with interoperability ?
 9 A. Certainly the issue of communication, as I recall, was
 10 raised by Mr Gaskell. The earlier points around the
 11 exploration of JESIP and JOPs, as I recall, was my idea
 12 because of how we ran exercises. So we had a lot of
 13 things that we put in place which almost circumvented us
 14 practising and testing JOPs. That's why I wanted the
 15 discussion with (inaudible: distorted) commanders so
 16 they could exchange views within tables, so a mixed
 17 table of all three services, and they could say how they
 18 thought it was and come to an understanding of each
 19 other's thoughts.
 20 Q. Bear with me a moment, if you will.
 21 (Pause)
 22 I think you've been asked to look at Mr Gaskell's
 23 statement in advance of giving evidence; is that right?
 24 A. Yes, that's correct .
 25 Q. I'll cut to the chase then. He asserts, I think it's

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1 paragraph 70 for the note of his statement, that Dave,
 2 ie you, obviously somebody he's worked with very
 3 closely, as I think you've already indicated --
 4 A. Yes, very much so.
 5 Q. "Dave appeared to acknowledge that some key officers
 6 from GMP did not appear to fully understand the MTFA
 7 JOPs or what fire and ambulance could bring to an MTFA
 8 response."
 9 That's what underpinned the arrangement of these
 10 sessions; is that fair comment?
 11 A. I do dispute some of that, sir . Certainly, I think that
 12 GMP commanders were fully aware of what our tri-service
 13 partners brought to the operation. I think the
 14 misunderstanding around JOPs wasn't purely in relation
 15 to the police, I think that was across all three
 16 services, and that's why we identified this, because it
 17 was something that we didn't really train or practice
 18 because we had so many assumptions put in place as
 19 a result of having to create separate functions to allow
 20 business as usual to continue. So I don't think the
 21 actual volume of calls coming in and the swamping of the
 22 areas and people's understanding of where best to go,
 23 I don't think we ever dealt with that.
 24 Q. Right. We can deal with the Fire and Rescue Service and
 25 the NWAS issues with their witnesses, but in terms of

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1 GMP there was quite clear concerns raised after
 2 Winchester Accord in particular about the failure -- it
 3 wasn't radio failure, was it, it was a failure of GMP to
 4 actually think to declare Plato to the waiting Fire and
 5 Rescue Service and Ambulance Service? It was an
 6 interoperability failure rather than simply
 7 a communications failure, wasn't it?
 8 A. That is certainly my understanding of it, sir, yes.
 9 That's what I've learned from that.
 10 Q. And that's why you put on these training days, and
 11 of course, as Mr Greaney has been through with you,
 12 there were three of them.
 13 A. Yes.
 14 Q. Am I right that they delivered similar training on each
 15 of the 3 days?
 16 A. Yes.
 17 Q. And did you do that to make them available for people
 18 who had busy operational duties elsewhere?
 19 A. That's correct .
 20 Q. You've already given evidence about whether you thought
 21 the GMP turnout was high enough, putting it neutrally,
 22 so I won't ask you directly about that. But these
 23 training courses, they'd have an attendance list,
 24 wouldn't they?
 25 A. Yes. The attendance -- the list of people who attended

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1 was collated by the Fire Service.
 2 Q. Right. So we should be able to find an attendance list
 3 which should tell us how many and which commanders
 4 actually turned up from Greater Manchester Police;
 5 is that right?
 6 A. Yes. If it has been retained, then yes, certainly .
 7 SIR JOHN SAUNDERS: It is possible to make training
 8 mandatory, isn't it?
 9 A. It is. Unfortunately, sir, the rules that we are
 10 governed by don't allow us to do that beyond the
 11 officers' role profile which is laid down by the CFI.
 12 It's an issue that we have --
 13 SIR JOHN SAUNDERS: So you can't make training mandatory?
 14 A. We can make training mandatory but what we can't do is
 15 decide that we're going to have some training in
 16 3 months' time and it's going to be mandatory. The
 17 issue being that your training is decided upon by the
 18 CFI under your role profile and that is mandated from
 19 1 April until 31 March the following year. You must
 20 attend the sessions which are mandated by the CFI and we
 21 cannot mandate anything in between that.
 22 SIR JOHN SAUNDERS: Thank you.
 23 MR WEATHERBY: Final question: if it had been within your
 24 gift, you'd have made this training mandatory, wouldn't
 25 you?

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1 A. Yes, I most certainly would.
 2 MR WEATHERBY: Those are the questions I ask. Thank you
 3 very much.
 4 Further questions from MR GREANEY
 5 MR GREANEY: Sir, as I mentioned, Mr Horwell has some
 6 questions, but just before he poses them, I would like
 7 just to ask about two matters in addition to those that
 8 I asked about earlier. One arises out of what
 9 Mr Weatherby's just asked and the other is a point of
 10 clarification. Can I ask them now so Mr Horwell can
 11 deal with them if he wants to?
 12 The first question is this. You were shown a note
 13 of the hot debrief conducted by a member of the
 14 Inspectorate with an officer of GMP.
 15 A. Yes.
 16 Q. On, as it turned out, 3 November 2016. The officer of
 17 GMP who attended the hot debrief, as we have understood
 18 it, was ACC Hankinson.
 19 A. Yes.
 20 Q. And in 2016 did you know that officer?
 21 A. I know of that officer. I don't know them.
 22 Q. And no doubt this can be clarified if needs be. Did
 23 that officer have any particular role in relation to
 24 Plato planning or in relation to firearms planning more
 25 generally?

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1 A. I don't know.
 2 Q. The second point, really to give you an opportunity to
 3 comment on it, is this. I don't know whether you saw
 4 any of the evidence of Mr Fletcher this morning.
 5 A. No, I didn't.
 6 Q. Mr Fletcher was the GMFRS contingency planning manager.
 7 Is he someone that you know or knew at the time?
 8 A. Yes, absolutely.
 9 Q. The overall thrust of evidence that he gave in answer to
 10 questions posed by Mr Cooper was that there had been
 11 problems on joint training exercises and that the common
 12 denominator to those problems, as he expressed it, was
 13 the police and he went on to suggest that there was
 14 a concern, at any rate within GMFRS, that JESIP had not
 15 been embedded fully by GMP and that there was too great
 16 a focus by GMP during joint training exercises upon
 17 their own role. Really, I want to just pose the
 18 question in this way: would you accept, bearing in mind
 19 the role that you had during 2015 to 2017, that GMP were
 20 not committed to joint training?
 21 A. I wouldn't support that in the slightest, sir, no.
 22 I think we were.
 23 Q. Would you accept that there was too great a focus by GMP
 24 on GMP's own role in isolation?
 25 A. Not that I witnessed, no.

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1 Q. And that there was too little focus by GMP on JESIP
 2 working during training exercises?
 3 A. Again, I wouldn't support that view, no.
 4 SIR JOHN SAUNDERS: The examples he gave of it were the
 5 police saw their job as to clear the problem out.
 6 A. Yes.
 7 SIR JOHN SAUNDERS: So on an MTFA.
 8 A. Yes.
 9 SIR JOHN SAUNDERS: And then they really weren't interested
 10 in what went on thereafter. So on Winchester Accord
 11 they actually pulled the plug on it after they'd done
 12 the clearing out, as it were, and that was it done.
 13 A. Yes.
 14 SIR JOHN SAUNDERS: And they tried to do it on another one,
 15 which was -- I can't remember which one. But actually,
 16 he said that the fire and the ambulance had to say, no,
 17 we are carrying on to the end of this exercise because
 18 of our part to play. So really, no real interest in the
 19 contribution that could be made by the Fire Service or
 20 what needed to be done by the ambulance. Were there
 21 concerns expressed to you?
 22 A. Other than Winchester Accord. I do recall Mr Gaskell
 23 talking about communications issues with
 24 Winchester Accord, sir. I don't recall other issues.
 25 SIR JOHN SAUNDERS: Okay, thank you.

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1 MR GREANEY: Thank you, sir. I will now invite Mr Horwell
 2 to ask his questions.
 3 Questions from MR HORWELL
 4 MR HORWELL: Thank you.
 5 Just on that last point, Mr Whittle, you had a very
 6 good working relationship with Mr Gaskell?
 7 A. Excellent.
 8 Q. And he would no doubt have raised any problems with you
 9 directly?
 10 A. Yes, as he did with Winchester Accord. We had an
 11 extremely good working relationship, both with
 12 Mr Gaskell and also Mr Watson. I have never had
 13 a better working relationship with outside agencies
 14 in the whole of my career.
 15 Q. This suggestion that has been made, and you were asked
 16 about suggestions made by one of the barristers in this
 17 inquiry, but the suggestion was made that GMP was not
 18 interested in interoperability. What do you say about
 19 that, Mr Whittle?
 20 A. That is completely incorrect. Quite the opposite.
 21 Q. Mr Whittle, I'm only going to ask you a few questions at
 22 the end of the day. I want to start with a document.
 23 You've referred to it in the course of your evidence,
 24 but it's not a document that has been shown to
 25 the chairman and it is perhaps an important document to

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1 follow the chain of the 4 May guidance. It's only one
2 page. It's an email. Could we look at it, please?
3 {INQ040403/1}.

4 If we could focus on the bottom half of the document
5 first. Mr Whittle, this is an email from you on
6 5 May 2017 to Simon Lear, copying in Tim Plumpton of
7 Cheshire Police, and this is you to Lear saying:
8 "Sir, please find attached the amended North—west
9 Region Operation Plato Response v2 draft. This version
10 includes NPCC Operation Plato Initial Response,
11 Contingency Planning Guidance for Police Forces v1. All
12 changes are in green text. For your consideration and
13 approval."

14 A. Yes.

15 Q. And Mr Whittle, you referred to this email without
16 looking at it and you said that it is of relevance that
17 when you sent the 4 May guidance to Mr Lear, you also
18 copied in someone else.

19 A. I did.

20 Q. And we can see from this email that it was Tim Plumpton
21 and the relevance of him and the relevance of the fact
22 that you copied him into that email?

23 A. He is the CFI, so the chief firearms instructor, for the
24 region.

25 Q. Right. So this wasn't only passing the guidance on to

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1 Mr Lear, it was passing the guidance on to the head of
2 the regional organisation?

3 A. Yes.

4 Q. If we look at the top of that email, we can see that
5 2 hours later, Simon Lear forwarded the guidance on to
6 Mr Giladi.

7 A. Yes.

8 Q. For him presumably to consider and approve?

9 A. Yes.

10 Q. Mr Whittle, simply on the question that you've been
11 asked as to why the 4 May guidance was called by you v2,
12 I can take you to the witness statement that you made if
13 you wish, but if we can deal with it as quickly as
14 possible. In your first witness statement you said that
15 you did not recall why you called this guidance
16 version 2, but you then thought that you might have
17 called it version 2 because the national guidance was
18 version 1.

19 A. Yes, that's correct, sir.

20 Q. And today, in evidence, you said that you believed you
21 called the 4 May guidance version 2 because appendix C
22 was version 1.10, so those are two different statements.
23 Are you able to remember now — and no one is asking you
24 to guess, Mr Whittle, as I'm sure you well know — are
25 you able now to say why you called the 4 May guidance

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1 version 2?

2 A. Yes, I am, sir. At the time I wasn't provided with the
3 documents, so my own recollection was obviously quite
4 dim and distant. However, having been provided with
5 those reference documents, it is obvious to me now that
6 I called it version 2 because I'd updated the Op Plato
7 response version 1.10.

8 Q. Mr Whittle, thank you. I thought we should clear that
9 up in case in the future it mattered.

10 I want now to take you to the SOP 47 version 5.
11 This is {INQ039970/1}. If we could start with page 1,
12 just to remind ourselves, this is the SOP that was in
13 force at the time you drafted the 4 May guidance.

14 A. Yes.

15 Q. You've been asked a number of questions about an FDO
16 delegating responsibilities to others and I want to turn
17 now, please, if we may, to {INQ039970/6} of that
18 document, and if we could focus on the lower third of
19 the page from "Force duty officer actions" downwards.
20 Thank you:

21 "The actions of the force duty officer in the
22 initial stages of a marauding terrorist attack are
23 crucial. The following actions are not exhaustive, and
24 the FDO will need strong support from the OCB team.
25 Some of the actions are likely to be delegated to OCB

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1 supervision."

2 That was in version 5 of the SOP.

3 A. Yes.

4 Q. And would you have expected any FDO to have been aware
5 of the fact that he should be delegating some of his
6 responsibilities to those in the operations room?

7 A. I would, sir. There's far too much to do for one
8 person.

9 Q. And although in version 5 of this SOP the principle of
10 delegation is clearly set out, this is not something
11 that we see in the 4 May guidance, but to any FDO
12 reading the 4 May guidance, would you expect the
13 principle of delegation to be well understood?

14 A. Yes, I would, sir.

15 SIR JOHN SAUNDERS: Do you mind if I interrupt you,
16 Mr Horwell?

17 MR HORWELL: Not at all, sir, please do.

18 SIR JOHN SAUNDERS: It's well understood you need to
19 delegate. Isn't the problem about this, though, that
20 actually delegating it on the night when it's all going
21 on around you is actually really difficult and what
22 needs to be done is the delegation to happen in advance
23 so if the emergency happens, everybody knows what
24 they're doing before rather than it having to be
25 delegated on the day?

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1 A. Certainly if that's possible, yes, sir.
 2 SIR JOHN SAUNDERS: That guidance doesn't really make that
 3 clear, does it?
 4 A. No, I think the disconnect at that point is obviously
 5 we are firearms instructors and firearms commanders and
 6 we're not OCB staff, so their SOPs and their ways of
 7 working are not known to us.
 8 SIR JOHN SAUNDERS: Right. Okay. Thank you, Mr Horwell.
 9 MR HORWELL: No, thank you, sir.
 10 And whilst on that page, Mr Whittle, the very last
 11 line:
 12 "Set the initial working strategy."
 13 A. Yes.
 14 Q. It's the case, isn't it, that working strategies in
 15 attacks of this nature are very often formulaic, and let
 16 me please explain what I mean by that. In a working
 17 strategy, following an attack such as this, you would
 18 expect there to be elements such as neutralise the
 19 threat, protect life and property, maximise safety of
 20 public and maximise safety of the emergency responders?
 21 A. It would be minimise risk to the public, sir. We
 22 maximise the safety of people we do control and we
 23 minimise the risk to people that we can't control.
 24 Q. All right. I've seen it both ways, Mr Whittle, but the
 25 point that I'm seeking to make is that the initial

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1 working strategy, and indeed the later working
 2 strategies set by others following an attack of this
 3 nature, is likely to be, I'm not suggesting on every
 4 single occasion, but likely to be relatively formulaic,
 5 isn't it?
 6 A. It is, yes. It will always identify public safety as
 7 the priority and neutralising the threat obviously goes
 8 hand in hand with that.
 9 Q. We can take that document off the screen, thank you.
 10 You have given evidence about the unfortunate
 11 coincidence of timing, the fact that the guidance you
 12 drafted with the date of 4 May was not sent to FDOs and
 13 others within the firearms world at command level until
 14 12 May, which of course was just 10 days before this
 15 attack.
 16 A. It was, sir.
 17 Q. In answer to a question you were asked this afternoon,
 18 "Which plan would you have expected Mr Sexton to use on
 19 22 May?", you answered:
 20 "The plan he was more comfortable with."
 21 A. Yes.
 22 Q. Mr Whittle, in relation to that answer, whether the
 23 SOP 47 version 5, appendix C v1.10, or your 4 May
 24 guidance, these basic principles would still have
 25 applied with clarity, I am going to suggest: first of

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1 all, informing the emergency services that Plato had
 2 been declared; no change there?
 3 A. No.
 4 Q. Informing the emergency services what was happening
 5 through a sitrep report?
 6 A. Yes.
 7 Q. Nothing changed.
 8 Identifying an RVP and informing the emergency
 9 services of it. No change there?
 10 A. No.
 11 Q. And informing everyone of the FCP once established.
 12 Nothing changed there?
 13 A. No.
 14 Q. Common, basic requirements; do you agree?
 15 A. Yes. Yes, I do.
 16 Q. And in terms of one of the slides that you were shown
 17 from your presentation, the essential elements of
 18 JESIP: co-locate, communicate, coordinate, jointly
 19 understand risk, and shared situational awareness.
 20 Nothing changed there; do you agree?
 21 A. I do.
 22 Q. Finally, I'm going to ask you to look at this because
 23 it's more than a sentence --
 24 SIR JOHN SAUNDERS: Are you moving on?
 25 MR HORWELL: I am, sir.

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1 SIR JOHN SAUNDERS: Can I just follow up on the questions
 2 you asked?
 3 MR HORWELL: I welcome all interventions, sir, so please do,
 4 thank you.
 5 SIR JOHN SAUNDERS: Am I to take that seriously, Mr Horwell?
 6 MR HORWELL: Of course. I wouldn't have said it otherwise.
 7 SIR JOHN SAUNDERS: The art of the advocate, I know.
 8 Just help me with this: you know the differences
 9 between what you put out in your document and what was
 10 already perfectly clear from other documents which had
 11 gone out and were in existence.
 12 A. Yes.
 13 SIR JOHN SAUNDERS: And you've just been asked by
 14 Mr Horwell, well, these principles were all the same and
 15 carried on. Can you identify anything in your new
 16 document, any change, which might have made a difference
 17 to what happened on 22 May if people had realised it was
 18 the new guidance and followed it? You may want to think
 19 about that, so by all means do.
 20 A. I think to give you a full answer on that, I would have
 21 to compare the documents, sir, because obviously the
 22 changes that I made are there in green text --
 23 SIR JOHN SAUNDERS: Would you mind doing that for me?
 24 A. Of course.
 25 SIR JOHN SAUNDERS: You won't need to come back, I don't

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1 think, but give us it in writing.
 2 A. Of course, sir.
 3 SIR JOHN SAUNDERS: Thank you. Thank you, Mr Horwell.
 4 MR HORWELL: We'll obviously ensure the witness makes
 5 a witness statement answering that question.
 6 SIR JOHN SAUNDERS: That would be helpful.
 7 MR HORWELL: Finally, Mr Whittle, this is your third witness
 8 statement, {INQ040413/1}. I can see you looking at
 9 a document. Whilst it's being put on the screen, if you
 10 go to {INQ040413/10}, please.
 11 You were asked about the training sessions, and it's
 12 the lower half of that document.
 13 A. Yes.
 14 Q. You were asked about the training sessions in January
 15 and February of 2017 and you were asked about
 16 paragraph 48 in which you said that you were to some
 17 extent disappointed that there were not more GMP
 18 commanders present. I just want to read on for the next
 19 two paragraphs, please, to put that into context:
 20 "The training was an exploratory session to talk
 21 openly about the inter-agency response. It was not
 22 designed to replace compulsory training for firearms
 23 commanders or other leaders. Each of the GMP
 24 commanders, whether they attended my session or not,
 25 would have been trained in JOPs and other relevant

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1 guidance from attendance at designated compulsory
 2 training on other occasions. I did not discern any
 3 unwillingness to attend my sessions on the part of GMP
 4 commanders but I knew many commanders were busy and
 5 sometimes had commitments which meant they could be
 6 required elsewhere, sometimes at very short notice.
 7 "Like any organisation I know of, we did not have
 8 infinite resources or staff and I would not have
 9 expected everyone to be able to attend."
 10 Does that put your views into a wider context,
 11 Mr Whittle?
 12 A. Yes. Yes, it does.
 13 MR HORWELL: Sir, thank you. That is all I ask.
 14 SIR JOHN SAUNDERS: Thank you very much, Mr Horwell.
 15 MR GREANEY: Thank you very much. I can see Mr Cooper has
 16 appeared on the screen. I don't know if that's
 17 deliberate or accidental.
 18 MR COOPER: I will try and assist you with a question you
 19 asked. Just before Mr Horwell began his examination you
 20 referred to Winchester Accord being one example where
 21 criticisms of the police were made concerning their
 22 knowledge or appreciation of multiple contributions.
 23 You mentioned correctly that there was another such
 24 example that Mr Fletcher gave. If I can remind you,
 25 sir, that considered the event on 13 January 2014 at

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1 a place that Mr Fletcher declined to explain for his
 2 concerns over security for understandable reasons, but
 3 we have it in the statement. The event on
 4 13 January 2014 was the other matter that you were
 5 searching for, sir.
 6 SIR JOHN SAUNDERS: Thank you very much. I'm grateful,
 7 Mr Cooper, thank you.
 8 MR GREANEY: Thank you, Mr Cooper.
 9 Sir, we have managed to conclude the evidence that
 10 we had scheduled for today. Tomorrow we shall hear from
 11 Inspector Simon Lear and retired Sergeant
 12 Stephen Henderson. And for good reason, sir, we will
 13 commence at 10.15 tomorrow morning, please.
 14 SIR JOHN SAUNDERS: Thank you very much for your help.
 15 A. Thank you, sir.
 16 SIR JOHN SAUNDERS: We'll be back at 10.15. Thank you.
 17 (4.57 pm)
 18 (The inquiry adjourned until 10.15 am
 19 on Tuesday, 23 February 2021)
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