OPUS₂

Manchester Arena Inquiry

Day 66

February 23, 2021

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1 Tuesday, 23 February 2021 1 the coming into effect of that plan in July 2012? 2. (10.15 am) 2 A. I was, yes. MR GREANEY: Sir, good morning. I'm sorry we are starting Q. Still dealing with matters of background, in 2012 when a few minutes later than even the delayed start today; 4 you joined the unit, how many inspectors were there 4 5 there was a good reason for that. The gentleman in the 5 in the firearms unit? 6 witness box is someone that we heard a good deal about 6 A. There were eight in total, sir. 7 yesterday, it's Inspector Simon Lear, and I will ask 7 Q. Sir. for your information. I'm in the first statement of 8 that he be sworn by Andrew, please. 8 Inspector Lear at paragraph 2. 9 INSPECTOR SIMON LEAR (sworn) 9 So there were eight inspectors? 10 Questions from MR GREANEY 10 A. Yes. 11 MR GREANEY: Would you begin, please, by telling us what 11 Q. Over time, was there any impact upon the number of 12 your full name is? 12 inspectors within the unit? 13 A. Simon Andrew Lear. 13 A. Over the next couple of years, sir, it went down from Q. Are you an inspector with Greater Manchester Police? eight to five and then finished at three. 14 14 15 A. I am. sir. 15 Q. What about other members of policing staff, so sergeants Q. Have you served for a period now in excess of 20 years? 16 and constables? Was there any --17 A. I have, sir. 17 A. No, that was constant, sir. 18 Q. In fact, about 22 years? 18 Q. But nonetheless, the number of inspectors reduced from 19 19 eight at the beginning in 2012 over a couple of years to A. That's right. 20 20 Q. Did you move to the tactical firearms unit of GMP in three? A. That's right, yes. 21 21 22 A. I did. Q. Which is, as Mr Whittle agreed yesterday, a substantial 22 23 Q. And serve there in the rank of constable until 2005? 23 reduction. What would you describe the consequences of such a substantial reduction in manpower at inspector 2.4 2.4 A That's correct Q. And then, later, in February 2012, having been promoted 25 2.5 level as having been? 1 3 1 by that stage to the rank of inspector, did you return A. Please bear with me. I then moved from operations to 1 2 to the firearms unit? 2 the policy unit, I think it was 2013/14. 3 A. I did. 3 Q. Can I ask you to pause for one moment? You're very 4 Q. At that stage did you have responsibility for a firearms 4 softly spoken. 5 team? 5 (Pause) 6 6 A. Basically, after being on the unit for approximately 7 Q. So would it be right to describe your role at that 2 years, then I was redeployed from the operational 7 8 stage, February 2012, as being an operational role? 8 teams to the Policy Compliance Unit --9 A. That's correct, yes. 9 Q. I'm going to ask you about that in a moment, but I don't 10 Q. At that stage, so still early 2012, and into the 10 wish to interrupt your answer. A. If I can put it in some sort of context, when the policy 11 mid-part of 2012, did you have any responsibility for 11 12 the development of firearms policy? 12 unit was first created, there was a chief inspector in 13 A. No, sir, not at that time. 13 charge, there was an inspector, there was a sergeant, 14 Q. Or Operation Plato policy? 14 and there were three or four staff. When I inherited it 15 A. No, sir. 15 a few years later, I had a sergeant who shortly after $-\!-\!$ Q. As the inquiry knows, the first iteration of what we now 16 I was there about a year and then he went temporary to 16 17 know to be SOP 47, so v1, and I know that you'll be 17 leave me on my own. Shortly again after being in the 18 familiar with that. 18 policy unit, approximately a year after that, I then 19 A. That's right, yes. 19 inherited the whole of the firearms training school as 20 Q. The inquiry knows that the first iteration of that plan 20 well, which up until that point had had a full 2.1 or policy is dated 25 July 2012. Did you have any 21 inspector, that being Dave Whittle who was here

involvement in the development of that plan? 23 Q. But in the early stages of your involvement, having

returned to the firearms unit in 2012, were you aware of

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My roles, my, shall we say, portfolio was so vast,

it had a detrimental impact, I was basically under so

much pressure and strain to work so far that near the

yesterday.

2.2

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A. No. sir.

- 1 end of 2017 it affected my health insofar as I had to
- 2 put a transfer request in for (inaudible: distorted) --
- 3 making me ill, basically.
- 4 Q. I don't think it is necessary to ask you where you went
- to at the end of 2017, but you moved away from firearms 5 policing altogether, did you not? 6
- A. Completely moved away from the firearms role, yes.
- Q. So, as you'll appreciate, you've said more there than 8
- 9 you said in your witness statements, and there's no
- 10 criticism, I'm quite sure that you've come here
- 11 determined to give your evidence very candidly. But 12 you'll appreciate I want to ask you some more about
- 13
- that, although I won't ask you more about your health. You mentioned the PCU. Before we delve into the 14
- 15 answer you just gave, let's just be clear about a few
- 16 things. You, I think, became responsible for the PCU,
- 17 namely the Policy and Compliance Unit, in 2014?
- 18 A. Yes. I think so. sir. ves.
- 19 Q. And then to add to your responsibilities, in 2015,
- 20 I think you told us, you became responsible for the
- 2.1 firearms training school?

2.2

- A. As well, sir, yes. 2.3 Q. And whereas the staff members in the PCU, as you told
- 2.4 us, went from chief inspector down to constable at one
- 25 stage, once you became responsible for the PCU, which is

- 1 the period that we are concerned with, from 2014, part
- 2 of the period we're concerned with, it was you and it
- 3 was Sergeant Whittle?
- A. That's correct, yes.
- 5 Q. So in short, there were many fewer officers within that
- department from that point in time? 6
- 7 A. Significantly less.
- $\ensuremath{\mathsf{Q}}.$ And I think what you're saying to us is that ultimately 8
- 9 that was to place you under a degree of pressure that
- 10
- 11 A. Yes, sir
- 12 Q. We just need to understand what the PCU was, the Policy
- and Compliance Unit. When was that unit, as you 13
- 14 understood it, implemented or brought into existence?
- A. I believe it was as a result of the inquest which was 15
- 16 into one of our colleagues which died in a training
- 17 incident, Ian Terry, and I believe it was from the
- 18 recommendations from the coroner's report, I believe.
- 19 Q. Did the responsibilities of the PCU, certainly whilst 2.0 you were heading it, include the maintenance of policy?
- 2.1 A. It did.
- 2.2 Q. Was that policy just for firearms situations or more
- 23
- 24 A. No, just purely firearms.
- 2.5 Q. So one responsibility was the maintenance of policy for

- firearms situations. Would that include what became
 - known from 2012 as Operation Plato type situations?
- 3 A. That's correct, sir, that was one of them.
- 4 Q. Did the responsibilities of the PCU also involve
- 5 conducting compliance checks?
- 6 A. It did, yes.
- 7 Q. So in other words, checking that the policies were being
- 8
- 9 A. Yes
- 10 Q. And also acting as secretary at force level meetings?
- A. That's correct, yes. 11
- 12 What did that involve?
- 13 So it would be like taking minutes of meetings.
- 14 You told me earlier that when you were in charge of
- 15 a firearms team, your role was operational?
- 16 A. That's right.
- 17 Q. So obviously you would be dealing with firearms
- 18 operations?
- 19 A. Yes. sir
- 20 Q. But now, from 2014, you were the head of PCU, was your
- 2.1 role operational at that stage?
- 22 A. No, sir. I was still an authorised firearms officer,
- 2.3 which I needed to do to conduct my training
- 2.4 responsibilities , but actually going out on the street
- 25 any more, I didn't do that.

- 1 $\ensuremath{\mathsf{Q}}.$ So there was a division between operational firearms
- 2. officers --
- 3 A. Yes
- $Q. \ \ --$ and, I don't know how you would describe it, but
- 5 firearms officers who were concerned with the governance
- 6 of firearms and firearms operations? Would that be
- 7 a fair way of describing it?
- 8 A. That's right. There was an intentional gap so we could
- 9 act independently and complete the compliance checks.
- 10 Q. We're going to just jump ahead from where I was
- 11 expecting to be at this moment in time, but it's
- 12 a consequence of the very candid answer that you've
- 13 given, and I will just ask you a series of what might be
- 14 thought to be very direct questions. Obviously, we are
- 15 going to look at the policies that were in place
- 16 in relation to Operation Plato.
- 17
- 18 Q. One of the issues with which the inquiry will be
- 19 concerned is the extent to which people understood the
- 20 plans and policies, understood what their role or roles
- 21 were, and were competent to perform them. Does that
- 2.2 make sense?
- 23
- 24 Q. The PCU had responsibility for compliance?
- 2.5 A. Yes

- 1 Q. So responsibility not just for policies but also for
- 2 checking that people knew what was expected of them;
- 3 is that correct?
- $4\,$ A. I think that was more from the training side. So
- 5 I think what we would do is then we would -- me anyway,
- 6 but for example the Op Plato plan, when it was updated,
- 7 would then be open source on the intranet for everybody
- $8\,$ $\,$ to look at . Then we would test knowledge in training
- 9 exercises .
- $10\,$ $\,$ Q. So can I look at it this way. Your unit would be
- 11 responsible for the policy?
- 12 A. Mm-hm.
- 13 Q. Once the policy had been brought in there would be an
- $14\,$ $\,$ obligation upon some other department within GMP to
- 15 train people in that policy?
- 16 A. The firearms training side, yes.
- 17 Q. But then your unit would come back in at a further
- $18\,$ stage, namely to check that the training was effective
- $19 \hspace{1cm} \text{and people were complying with the policy?} \\$
- 20 A. I'm not quite sure we did that, sir. I think the
- 21 compliance checking we were doing was more along the
- 22 lines of more mundane things such as the armouries, for
- 23 example, the armoury procedures. I think there's always
- been an onus on the individual, the policies are open
- and published, to read them themselves and then they

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- 1 would be tested in training.
- 2 Q. Right. As we're going to see when we look at the
- 3 policies, the plans for handling an MTFA were not
- 4 straightforward, were they?
- 5 A. No. No
- 6 Q. And as I described it yesterday with Mr Whittle —— and
- 7 I believe you saw his evidence?
- 8 A. Yes.
- 9 Q. There were three separate but connected layers. There
- 10 was the overarching —
- 11 A. Yes.
- 12 Q. regional policy that dealt with exchange of firearms
- 13 assets?
- 14 A. Mm-hm.
- 15 Q. There was beneath that the regional MTFA policy?
- 16 A. Yes.
- 17 Q. And then beneath that there was the GMP operational MTFA
- 18 policy?
- 19 A. That's correct, yes.
- $20\,$ $\,$ Q. So there were, depending on how one looked at it, either
- $21\,$ three or certainly two policies that dealt with how an
- 22 officer ought to respond to an MTFA?
- 23 A. That's correct, yes.
- $24\,$ $\,$ Q. Two of them dealt specifically with an MTFA?
- 25 A. Mm-hm.

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- 1 Q. And they dealt with it in different terms?
- 2 A. That's right.
- 3 Q. I am not going to suggest for a moment this is
 - a criticism of you, but it might be suggested that it's
- $\,\,$ not ideal to expect an officer to just read those and
- know how to respond in what would be a highly pressured situation of an MTFA. Would that be a fair observation
- 8 to make?
- 9 A. I think that would be a fair observation to make and if
- 10 I can make a comparison, the version which we're going
- 11 to talk about with regards to Mr Whittle, the training
- 12 which was planned for August/September, that would have
- gone through the policy almost page for page and
- 14 explored all the different layers . That was the
- 15 intention of that training.
- 16 Q. I don't know what view you take, but the idea that you
- implement a policy in the May and don't train anyone in
- 18 it until the August or September might be thought to be
- 19 less than ideal.
- 20 A. I fully agree. I would support that view.
- 21 Q. But particularly when one considers the position of the
- FDO, upon whom a very significant burden is going to
- 23 fall in the event of an Operation Plato situation?
- 24 A. Yes, without doubt.
- Q. Do you think, looking back and being, as I know you will

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- be, frank about it, that the PCU in the period from 2014
- to 2017 was properly resourced to properly conduct its
- 3 role?

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- 4 A. No. sir.
- 5 Q. As you'll appreciate, we're going to come back and look
- 6 at that when we look at the policies and consider the
- $7 \qquad \text{impact that that under-resourcing had}.$
 - I'm going to ask you to help, first of all,
- 9 in relation to a couple of issues to the extent that you
- 10 can. Whilst you were the head of the PCU, as you've
- explained to us, you didn't have a chief inspector line
- 12 manager, did you?
- 13 A. No, sir, I used to report directly to Superintendent
- 14 Leor Giladi
- $15\,$ $\,$ Q. Did you have an understanding of to whom he would
- 16 report?
- 17 A. Yes, it would be to the ACC who had the responsibility
- for firearms, the thematical(?) lead.
- 19 Q. Did you know between 2014 and 2017 who the ACC lead was?
- $20\,$ $\,$ A. At that time I couldn't tell you, sir . The change in
- 21 dedicated ACC in this area of business, I think -- it
- 22 was significant . We had an awful lot of ACC churn.
- 23 Q. So is another way of putting that that there didn't seem 24 to you to be consistency --
- 25 A. No, sir.

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- 1 Q. -- at ACC level?
- 2 A. No.
- 3 Q. And it doesn't sound, given you don't appear to know who
- 4 it was, that you had a lot or any direct contact
- 5 personally?
- 6 A. No, I did have quite a lot of contact, but I'm not quite
- 7 sure whether it would be Ms Hankinson or which one
- 8 it would be at that moment in time.
- 9 Q. So it could be one of a number of ACCs?
- 10 A. Yes, it could have been, sir.
- 11 Q. It's a phrase I have used a number of times and will
- probably use again. Was that to your mind a less than
- 13 ideal situation?
- 14 A. It was, sir.
- 15 Q. And indeed, an unsatisfactory state of affairs?
- 16 A. It was, sir, yes.
- 17 Q. One more matter of detail and then we'll move into the
- MTFA plans. At the time of working within the firearms
- 19 environment were you an authorised firearms officer?
- 20 A. I was, sir.
- 21 Q. A firearms tactical adviser?
- 22 A. Yes, sir.
- 23 Q. An occupationally competent tactical firearms commander?
- 24 A. Yes, sir.
- 25 Q. Both initial, so ITFC, and planned?

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- 1 A. Yes, sir.
- 2 Q. A post-incident manager?
- A. Yes.
- 4 Q. And a national firearms instructor?
- 5 A. I was, sir
- 6 Q. So you were well trained for the role you performed
- 7 at the PCU?
- 8 A. I think so, I was in a good place.
- 9 Q. The simple fact of the matter is that you were
- 10 under-resourced?
- 11 A. That's right
- $12\,$ $\,$ Q. And placed under much too great a pressure?
- 13 A. I had two competing jobs.
- 14 Q. What do you mean by that?
- $15\,$ $\,$ A. What I mean by that is today I would do a compliance
- 16 check and tomorrow I would be delivering training.
- $17\,$ $\,$ Q. Should we understand from that answer that it would have
- been in your mind, and you're on the ground at the time,
- 19 it would have been better if those two roles had been
- 20 separated out?
- $21\,$ $\,$ A. That's right, and I think if I may go further, I think
- Greater Manchester Police has now recognised that and
- 23 they have now separated again with chief inspector and
- 24 inspectors in both roles.
- Q. So they have now recognised it, but to your mind should

1 it have been obvious at the time between 2014 and 2017?

- A. That they should have been separated? Yes.
- 3 SIR JOHN SAUNDERS: Did you make that point to your 4 superiors?
- 5 A. It was certainly mentioned, sir, yes.
- 6 SIR JOHN SAUNDERS: By you?
- 7 A. Yes.
- 8 SIR JOHN SAUNDERS: To?
- 9 A. Mr Giladi. We used to have quarterly meetings, which
- 10 were called firearms policy group meetings, every
- 11 3 months and resourcing was always discussed. It was
- 12 always discussed.
- $13\,$ $\,$ MR GREANEY: Did you make plain to Superintendent Giladi the
- degree of unacceptable pressure that it seems clear you
- 15 felt under?
- 16 A. I certainly let him know that I had a lot of work on.
- 17 Unacceptable pressure, I'm not quite sure I used those
- words to him.
- 19 Q. Would you have felt comfortable using those words to
- 20 him?
- 21 A. I think so. He was a very frank man and open with us.
- 22 Q. I think you're drawing a distinction between the
- 23 language I used of saying, "I'm under unacceptable
- 24 pressure", whereas your own language was, "I have got
- a lot of work on"?

15

- $1\,$ A. That's right, yes. And jargon, yes, as well. If I may,
- 2 one of the emails highlights that, an email which you
- 3 many not have, where Mr Giladi is asking me, "Can I have
- 4 this policy, can I have this policy?", and I say, "But
- 5 can you tell me when so I can control my level of
- 6 panic?" I was always working at 90/95%.
- 7 Q. I think you're talking about the period between April
- 8 and May 2017 —-
- 9 A. That's right, yes.
- 10~ Q. -- when you were required to produce or cause to be
- produced what became the Whittle plan?
- 12 A. That's correct
- 13 Q. And it's a strong word you have used, but did you feel
- a degree of panic in relation to that period?
- 15 A. It's juggling all these balls, isn't it? And I would
- 16 need to know which one to focus on. But yes, it was.
- Q. And we're going to come on to look at the Whittle plan
- and I genuinely don't mean any criticism of you or him,
- but the degree of panic that you felt under --
- 20 A. Yes

2.2

- 21~ Q. $\,--$ do you think that it would be fair to say that that
 - resulted in inadequacies in the Whittle plan?
- 23 A. I think the plan per se is okay and I think it's
- quality assured they also gave us, shall we say,

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- 1 positive notes. I think the timing of the plan, and
- 2 I think, shall we say, the expectancy by senior
- 3 commanders to get the email, the national guidance, in
- 4 the March --
- 5 Q. Yes

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- A. -- and say, "Please urgently review your plans", for us 6
 - to swap them around, so within a month we did it, that
- 8 was the result of the training not being done for 2 or
- 9 3 months.
- 10 Q. I really am now jumping ahead and we will come back to
- 11 (overspeaking). This isn't your fault at all and this
- 12 is a very helpful way, I hope the chairman will agree,
- 13 of dealing with it.
- As you rightly say, the refreshed guidance from 14
- 15 CTPHQ came out in the March of 2017.
- A Yes 16
- Q. But in November 2016, in fact 3 November 2016, as we 17
- 18 heard in evidence, the Inspectorate had said to
- 19 ACC Hankinson there are problems with your Plato plan,
- 20
- 2.1 A. Yes.
- 2.2 Q. You and I know what we're talking about.
- 2.3 A. I know exactly, sir.
- 2.4 Q. Are you aware that we've heard evidence to that effect?
- 2.5 A. I saw it yesterday.

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- 1 Q. So you've spoken about a period between March or
- 2 April/May 2017?
- 3 A. Yes.
- Q. At a corporate level GMP knew there was a problem with
- 5 the Plato plan, certainly by early November of 2016.
- 6 Did anyone tell you, as head of the PCU, in late 2016 or
- 7 early 2017, "The Inspectorate think this plan has
- 8 deficiencies "?
- 9 A. No, sir.
- 10 Q. Is that acceptable?
- 11 A. Not really
- 12 Q. The second thing that leads on from what you've said,
- 13 I asked you whether there were inadequacies
- 14 in the Whittle plan, and if there were whether they were
- 15 a result of the pressure under which it was produced.
- 16 You pointed out that the assurance visit in the July
- 17 identified no problem. But a problem, a problem, that
- 18 it might be thought existed with the Whittle plan was 19
- that everyone knew that the FDO in the event of 2.0 a real-world Plato incident was at, to say the least,
- 21 risk of being overloaded?
- 2.2 A. Definitely, definitely.
- 23 Q. And yet a difference between v5, the Giladi October 2016
- 2.4 plan, and the Whittle May 2017 plan, was that on the
- 25 face of it the FDO was given more to do, not less?

- A. Mm. I understand that.
- Q. And there was no scheme within the plan itself for
- 3 delegation; can you see what I mean?
- 4 A. I understand what you're saying, sir, yes.
- 5 Q. I'm sure you can understand that some would see that
- state of affairs and think: that doesn't seem like the 6 7
 - right way to have dealt with things?
- 8 A. I understand what you're saying, sir.
- 9 Q. If that is a fair position, if that is an inadequacy
- 10 with the plan, do you think that that was a consequence
 - of it being produced under the degree of pressure or
- 12 in the situation of panic that you have described?
- 13 A. I would tend to suggest that if we were given more time,
- 14 I think ... The whole ethos, shall we say, of the new
- 15 plan, the new national guidance, was that the FDO more
- 16 than likely would be overwhelmed. That was the
- 17 identifying factor and I think the mitigation to try and
- 18 assist the FDO was these flash cards or worksheets,
- 19 however they were meant to be called. I do agree that
- if we had waited slightly longer, then it would have 2.0
- 21 allowed whoever was going to create those more time to
- 22 do so 2.3 Q. I think the problem, as we're going to discover, is that
- 2.4 if the idea was that there should be action cards or
- 2.5 something similar, they hadn't come into effect within

- 1 the force control room by 22 May.
- 2 A. I couldn't answer that, sir. Certainly they might have
- 3 had something, I don't know. I don't know. I really
- SIR JOHN SAUNDERS: Do we have any evidence that that was 5
- 6 actually planned, to do flash cards?
- 7 MR GREANEY: I was about to explore that. One of the things
- 8 you said along that answer was there was -- the word you
- 9 used was mitigation.
- 10 A. Yes
- Q. Let's just work it out. In 2017 everyone knew that 11
- 12 in the event of a real-world Plato event that the FDO
- 13 would be overburdened?
- A. Yes 14
- 15 Q. It wasn't just a question of there being some risk that
- 16 was identified of the FDO being overburdened, everyone
- 17 knew that the reality was, as matters stood, the FDO
- 18 would be overburdened, didn't they?
- 19 A. Certainly that would be my understanding. I'd never
- 2.0 been an FDO but for me it seems to make sense that
- 2.1 there'd be so much activity inside that control room, so
- 2.2 many calls coming in, so much would be going on, I can't see how one person on their own would be able to do
- 23 24 that.
- Q. So this is really a very significant policing problem, 2.5

1 isn't it?

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- 2 A. I would agree with you, yes.
- 3 Q. That the FDO is critical to the effective response to 4 this incident and yet that's the point where failure is
- 5 going to occur?
- 7 Q. So what you said to us was that when the May plan was
- 8 being devised, and obviously you were the line manager
- 9 for the person that did it --

A. I agree with you, sir, yes.

- 10 A. For Dave, yes.
- 11 Q. -- that mitigations were to be put in place?
- 12 A. That's correct.
- 13 Q. And you seemed to suggest that you had in your own mind
- 14 the idea of action cards or something similar?
- 15 A. That's right, that's my understanding.
- 16 Q. This is really what the chairman was inviting me
- $17\,$ a couple of minutes ago to deal with: what was being
- done? What concretely was being done in May 2017, or
- earlier, to put in place a system of action cards so that those in the force control room would know.
- that those in the force control room would know,"goodness, this is really happening, it's my job to
- 22 contact the OSCT"?
- 23 A. To be honest, sir, we, that being Dave Whittle and
- 24 myself, were responsible for sorting out the plan for
- 25 want of a better word. We were the firearms side and

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- 1 that was the plan which we came up with. He was also
- 2 tasked with —— dealing with the guidance was
- 3 Chief Inspector Mike Booth and he was the
- 4 chief inspector in charge of the OCR. He came with me
- 5 to the quality assurance in -- was it July? That was
- 6 his task to do.
- 7 Q. But that's -- I don't mean to cut across you. That is
- 8 a couple of months after 22 people have died in the
- 9 arena attack.
- $10 \quad \text{A. I fully understand that, sir} \, .$
- $11\,$ $\,$ Q. What was being done with Mr Booth, or anyone else from
- the OCR, before the arena attack?
- 13 A. I don't know. sir.
- $14\,$ $\,$ Q. When you look back, does it seem to you that there was
- a disconnect or a failure of communication between those
- 16 responsible for Plato policy and those responsible
- $17 \hspace{1cm} \text{within the control room for implementing it to work out} \\$
- how this was really going to work in practice?
- 19 A. I think ... How can I put it? We were given that task.
- $20\,$ $\,$ The way I understood it, Mr Giladi had the
- $21 \hspace{1cm} \text{responsibility} \hspace{0.2cm} \text{of the whole implementation, so that} \\$
- 22 would be -- and I think there was quite a lot of
- 23 discussion yesterday with regards to unarmed members of
- staff , do they know about Stay Safe and all that sort of
- stiff . So I think that Mr Giladi was the central pin to

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- 1 our implementation. I know what he told me, which was
- 2 to sort the plan out. I'm not quite sure what he would
- 3 have told Mike Booth or whatever he did with the unarmed
- 4 staff . I understand exactly what you're saying. We,
- 5 that being Dave Whittle and myself, were working with
- 6 Comms to do this.
- 7 SIR JOHN SAUNDERS: So in a way you are saying: we do the
- 8 plan and it is someone else's job to implement it, to
 - make it work?
- 10 A. Definitely, sir -- or to make these cards. And what
- 11 the --

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- 12 SIR JOHN SAUNDERS: Hang on for a moment, sorry. Mr Whittle
- $13\,$ was accepting, as you've accepted, that his plan landed
- 14 more on the FDO, the force duty officer.
- 15 A. Yes, sir.
- 16 SIR JOHN SAUNDERS: And everyone already knew that they were
- going to be overwhelmed. So shouldn't something be put
- in it just to the effect: this plan is done on the basis
- that the FDO is in charge and is to ensure these things
- 20 are done, but it's quite impossible -- we accept
- it would be quite impossible for him to do it and
- someone needs to work out a system of delegation?
- 23 A. I can see your point, sir, yes.
- 24 SIR JOHN SAUNDERS: Should that have been in it?
- 25 A. Possibly, sir. I think there was an assumption, as you

23

- $1 \hspace{1cm} \hbox{quite rightly said, that one person couldn't do all} \\$
- those tasks. Again as I said, these tasks. it's not
- meant to be number 1 follows number 2 follows number 3.
- 4 The whole ethos was that the flash cards were there for
- 5 the purpose of saying, "Right, dish them out, could you
- 6 please do that, can you do that, can you do that", so
- 7 it would all be getting completed concurrently.
- 8 SIR JOHN SAUNDERS: But there were no flash cards?
- 9 A. That's what I'm saving. I can't comment on that.
- 10 I don't know what the OCR had or hadn't.
- 11 MR GREANEY: I don't want to put you in a difficult
- 12 position, but what we do understand is that your
- 13 responsibility was firearms, was it not?
- 14 A. That's correct, sir.
- 15 Q. But the plan that you were producing created
 - responsibilities not just for firearms officers, it
- 17 created responsibilities for unarmed officers who would
- be at the scene?

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2.4

- 19 A. That's right, yes.
- 20 Q. And it created responsibilities for the FDO and staff
- 21 within the force control room?
- 22 A. That's correct, yes.
- 23 Q. I think what you're saying to us is, as the firearms
 - people, you could devise the plan, but you had to leave
- it to other people to decide how that would be

- 1 implemented across that spectrum of different people
- 2 with different responsibilities?
- 3 A. Certainly for the OCB, yes.
- 4 Q. Whose job was it, in your view, to ensure that flash
- 5 cards, action cards or something similar existed within
- that force control room so that when what happened on 6
- 7 22 May happened, people knew what their job was?
- A. My understanding, as I have said, it was Chief Inspector 9 Mike Booth.

- 10 Q. So Chief Inspector Booth was in charge of?
- 11 A. The OCR, the whole communications branch -- not branch,
- 12 but you know
- 13 Q. From whom you would have expected him to have taken his
- 14 instructions?
- 15 A Mr Giladi
- Q I don't want to be unfair to someone who isn't here at 16
- 17 the moment, but he has responsibility for the
- 18 communications branch.
- 19 A. For the FDOs, et cetera.
- 20 Q. So he's on that side of it?
- 2.1 A. Yes.
- 22 Q. You're on the firearms side of it. Someone needs to
- connect you to him, don't they? 2.3
- 2.4 A. Yes, sir. My assumption, maybe it's a completely wrong
- 25 assumption and maybe we shouldn't be making assumptions,

- 1 but my assumption was that Mr Giladi was the
- 2 coordinator.
- 3 Q. I don't know whether it's an assumption or not, but you
- were there on the ground and are, I suggest, in
- 5 a position to help us and your perception -- and if your
- perception is wrong, it can be corrected, no doubt --6
- is that Superintendent Giladi was the one who was to
- 8 join these dots together?
- 9 A. That's correct, ves.
- 10 Q. Right.
- SIR JOHN SAUNDERS: Okay, but what we've actually seen 11
- 12 is that practically immediately from the time it was
- $finished\,,\ it\ is\ brought\ into\ effect\,?$ 13
- 14 A. That's right, yes.
- SIR JOHN SAUNDERS: So there's no much opportunity for 15
- 16 Mr Booth, or anyone like that, to actually work out how
- 17 they're going to implement it before it's brought into
- 18 action?
- 19 A. I fully agree with you, sir.
- 2.0 MR GREANEY: As you saw the evidence yesterday, it's a point
- 21 that the chairman made.
- 2.2 A. No, no, I fully agree, sir. I don't want to bring it
- 23 back to points we've already considered, but as you
- 2.4 said -- you mentioned this word about panic about
- 25 bringing this policy in --

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- Q. You used the word panic.
- A. To Mr Giladi yes, but... I don't know what the major
- 3 drive was. I assume it was the March document.
- 4 Q. Exactly.

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- A. But I don't know why... You alluded to HMIC giving 5
- feedback in -- was it November? 6
- 7 Q. 3 November was the hot debrief, yes.
- A. If we were given that, we could have started working on 8
 - a plan there and do -- shall we say, more time to
- 10 implement stuff. But the way it came to me was the
- 11 email which was, "Review your plans urgently", then
- 12 I think you have seen an email trail which went from the
- 13 chief constable all the way down to Mr Giladi and then
- 14 to myself saying, "Update it". And then Mr Giladi
- 15 saying, "Give me the plan", and it was sent to, I think
- 16 it was 5 May, was it, for him to take to COG. So
- 17 I don't know what the huge, shall we say, rush was but
- 18 then it's given to me to make the best of the situation.
- 19 So that's why I arranged the training or attempted to
- 20 arrange the training.
- 2.1 Q. Sure, and I have no doubt most people will understand
- 2.2 exactly what you're saying, that if you'd had from
- 23 3 November, or shortly afterwards, to review the
- 2.4 Operation Plato plan then some of the inadequacies, if
- 2.5 that's what they were, in the plan that was created

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- 1 might not have existed. There would have been more time
- to coordinate with the communications branch. But in 2
- 3 the result you didn't have from November or December, or
- January, or March?
- 5 A. That you have very eloquently said, yes.
- 6 SIR JOHN SAUNDERS: Actually the problem with the
- 7 overloading of the force duty officer was something
- 8 which had been known for a long time before any of this
- 9 started, so in a way the absence of doing anything about
- 10 it on this new system was just continuing what had been
- 11 going on for a long time; is that fair?
- 12 A. I think so, sir.
- MR GREANEY: What would be the driver for an amendment to 13
- the policy? So the chairman's point is, if I may say 14
- 15 so, very well made. People had known for ages that the
- 16 FDO was going to be overloaded, so there was obviously
- 17 a problem with v5. What was going to be the driver for
- 18 a change? Was it for you, as the PCU, to review every
- 19 week or month or 6 months policies and decide what to do
- 2.0 or did something need to happen or some instruction need
- 21 to be given for a change to occur?
- 2.2 Policies can change for a number of reasons. It could
- 23 be national guidance, for example, as in this case, but
- 2.4 it could also be, shall we say, testing. For example,
- 25 if we had an exercise and something didn't work and

1 we can see an obvious change to it, then we could -- we 2 don't have to wait for a year to change it. Certainly 3 I would suggest if we would have had the feedback which 4 we didn't, if we would have received that feedback in November that would have automatically started a revamp. 5 Q. Let's look at what the feedback was. We really are 6 7 jumping around, but I hope this is emerging in a way 8 which is logical. Mr Lopez, could we have on the 9 screen, please, a statement that we had yesterday, 10 $\{INQ029796/14\}$. It's paragraph 61. The bottom of that 11 page, please 12 This is the statement of Andrew Buchan, who formed 13 part of the Inspectorate that were looking at 15 forces, 14 including GMP, in the context of counter-terrorism

part of the Inspectorate that were looking at 15 forces, including GMP, in the context of counter—terrorism during 2016. So GMP's Operation Plato plan. He is talking about version 5, so the Giladi plan, which in fact was created for the purposes of the Inspectorate's visit:

"This evidence was obtained following a document review of the GMP Plato plan. We found the GMP plan complied with the 2011 national guidance."

That's a reference to the ACPO TAM guidance:

"The plan, locally referred to as specialist operations branch firearms standard operating procedure 47 for marauding terrorist firearms attack

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(Operation Plato) had been regularly reviewed."

Next page, please. {INQ029796/15}:

"We examined version 5 that had been updated in October 2016. The report was very tactical and focused on the roles, responsibilities and tactics of armed officers and firearms commanders. There was no mention in the plan of working with other agencies responding to the incident, although there were isolated bullet point references to the joint emergency service interoperability principles. The plan included the Stay Safe guidance, but did not identify how this would be communicated to those responding to a terrorist attack."

And this:

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"The role of the force duty officer and potential issued identified. The GMP Plato plan recognise the extreme workload that is likely to be experienced by the force duty officer, in all likelihood the initial commander of the police response to a terrorist attack. Despite this, the plan does not detail how the FDO will be supported during this period of high demand. We believed [the Inspectorate] that GMP plans placed an over—reliance on the FDO to complete a significant number of functions in the early stages of a terrorist attack. GMP needed to provide more support to the FDO, allowing him/her to focus on commanding the initial

1 response."

2 So do you agree that is a clear identification of

3 problems with v5?

4 A. Yes, sir.

 $5\,$ $\,$ Q. And I think that what you're saying is that if that had

6 been communicated to you in November, or anything like

7 November of 2016, your team would immediately have

8 started the work on reviewing the plan?

A. I think that's fair to say, yes.

 $10\,$ $\,$ Q. And you would have had more time to ensure it worked

11 properly?

12 A. Yes, sir.

9

13 SIR JOHN SAUNDERS: Okay. I'm just wondering whether

14 there's a contradiction in working out how the FDO

15 sorted out support. You say it was the responsibility

16 of Inspector Booth?

17 A. That's how I understand it.

18 SIR JOHN SAUNDERS: But now when Mr Greaney has pointed out

19 to you what the Inspectorate were saying, which is the

20 same thing --

21 A. Yes, sir.

22 SIR JOHN SAUNDERS: -- you would have said you would have

23 then reviewed in the policy unit your advice?

24 A. Yes. We would have looked at the document, taken the

advice that was given there from HMIC and then tried to

3

1 progress it.

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2.4

2 SIR JOHN SAUNDERS: And then you would have worked some way

out where the FDO could delegate his jobs?

4 A. I think what we would have done, sir, is brought

5 Mr Booth in and had a discussion on how to do it.

6 SIR JOHN SAUNDERS: Thank you.

 $7\,$ $\,$ MR GREANEY: So when in the end the Whittle plan, as I have

 $\ensuremath{\mathtt{8}}$ been describing it , came into existence, to whom did it

9 go? I don't mean all of the FDOs and so on, but did it

go to a more senior officer than you?

11 A. Could you say the question again, sorry?

12 Q. The Whittle plan comes into effect on 4 May 2017

13 (inaudible: distorted) and it came to you?

14 A. Mr Whittle wrote it and sent it to myself.

15 Q. And did you consult Superintendent Giladi or any more

senior officer about it?

17 A. Yes, I sent it to Mr Giladi, I think, on the 5th,

18 I think.

19 Q. We're trying to work out what would have happened if

20 you'd had more time. What did you imagine

Superintendent Giladi would do with the plan once he had

22 it?

23 A. Mr Giladi was requesting this document to take to a COG

meeting or a Chief Officers' Group meeting. I think it

was for Mr Potts, who was the ACC to, show that we'd

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- 1 actually done a -- made progress on the March direction
- 2 to update our plans. So in my mind what he was saying
- 3 is: give me the document because I've got to present it 4 to the chief officers.
- $\ensuremath{\mathsf{Q}}.$ So did you have the authority, as an inspector within 5 PCU, to say to Inspector Booth, "This is what I expect 6
- vour team to do"? A. Absolutely not.
- 9 Q. Did Superintendent Giladi or the chief officers have 10 that ability?
- 11 A. Yes. sir.
- 12 Q. We've covered a lot of ground already.
- 13 A. Sorry.

- 14 Q. Don't be sorry. I'm not going to say accidentally, but
- 15 we've jumped very much further ahead than I was
- 16 expecting. What I'm going to do now is return to my
- 17 plan and try to ensure that we don't cover too much of
- 18 the same ground again and get through this as
- 19 efficiently as possible because I'm keen that your
- 2.0 evidence should conclude before lunch.
- 21 What I want to ask you about -- that isn't in any 22 sense out of a desire to shut you down from saying
- 2.3 anything that you want to say about what you have said
- 2.4 so far which might be thought by many people to be
- 25 extremely helpful and informative.

- 1 I want to ask you next about the North—west Armed
- Policing Collaboration. I'm at your first statement, 2
- 3 paragraphs 9 to 15. What is and was the North-west
- Armed Policing Collaboration?
- 5 A. The North-west Collaboration is a training
- collaboration. We always had something beforehand, sort 6
- 7 of like a request for mutual aid, but this was something
- 8 a little bit more formal. As I say, this was a training
- 9 collaboration. What that meant is that it had one chief
- 10 firearms instructor who would authorise our training to
- 11 try and introduce some sort of standardisation
- 12 throughout the region.
- 13 Q. We know which forces were members of it. We don't need to go back over that. 14
- 15 Notwithstanding that this organisation existed for
- 16 the purposes of standardisation and compliance with
- 17 training, did the GMP ACC firearms lead retain
- 18 responsibility for making all operational decisions
- 19 relating to Greater Manchester firearms $--\,$
- 2.0 A. That's correct.
- 2.1 Q. — be that local policy or procedure?
- 2.2 A. Yes. sir.
- 23 Q. With the creation of the collaboration, which you've
- 2.4 been able to confirm was in 2012, was a decision made
- 25 about what had been described as standing operating

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- 1 procedures?
- 2 A. There was, sir. It was deemed that there was too many
- 3 standing operation procedures and we were able to get
- 4 rid of a significant amount. GMP, for example, had
- 47 indeed, Plato was the last one but many of them 5
- would be for irrelevant things such as which boots 6
- 7 we were meant to use or how we were meant to do stuff,
- 8 which was represented or replicated somewhere else. So
- 9 a lot of them were redundant so they were finalised and 10 archived
- 11 Q. At some stage obviously there developed a scheme whereby
- 12 there would be these different layers of policies and
- 13 plans. How did that develop?
- 14 Are we talking about the cross-border boundary?
- 15 Q. Let's focus it in on the cross-boundary policy, yes.
- 16 A. I think if we look at the cross—boundary policy, what
- 17 that is, it's almost like an MoU, a memorandum of
- 18 understanding, which talks about how forces within the
- 19 region can best use their resources, be that, shall we
- say, my resources in county A are all tied up at a job, 20
- 2.1 so we could ask the neighbouring force to assist . So
- 22 that was the thought process with regards to the
- 2.3 cross-boundary policy.
- 2.4 The way in which you explain it in your second
- 2.5 statement, I'm at paragraph 4, is that what developed

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- 1 was a set of regional documents. I'm at page 2 of your
- 2. second statement, paragraph 4(b). There was a set of
- 3 regional documents, each called the cross-boundary ARV
- 4 capability SOPs.
- 5 A. That's right.
- 6 Q. Which went through various iterations?
- 7 A. That's right.
- 8 Q. We'll identify in a moment which was in force at the
- 9 relevant time. So that was the top layer. Beneath
- 10 that, so far as relevant in the circumstances of this
- 11 case, there was appendix C?
- 12 A. That's right.
- 13 Q. So the top layer dealt with firearms generally?
- 14 A. Day-to-day business.
- 15 Q. The middle layer, appendix C, dealt with firearms
- 16 sharing specifically so far as an MTFA was concerned?
- 17 A. That's correct.
- 18 Q. And then beneath all of that there was the GMP
- 19 force-specific SOP, which in this case was SOP 47?
- 2.0 A. Yes. sir.

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- 21 Q. And at paragraph 57 of that second statement, so
- 2.2 page 12, you identify those that were in force. I used
- 23 the date yesterday of 4 May. The date you've used is
- 2.4 12 May, which is the better date. You state there:

"For the avoidance of doubt, before 12 May 2017, the

1 following three documents were in force as [you "Reference documents. The following documents 2 understood] it." 2 should be referred to in conjunction with this 3 The cross-boundary ARV capability SOP v1.4? 3 document." 4 A Correct 4 And there's then a reference to the joint operating principles, the JOPs, edition 2. As I have said, this 5 Q. That's the overarching regional policy. Appendix C, 5 version 1.10? document is dated October of 2016. By that stage JOPs 6 6 A. That's correct, yes. 7 edition 3 had been in existence for 10 months and do you Q. Which was the regional MTFA policy. And SOP 47, agree that Superintendent Giladi's v5 is therefore 8 8 9 9 referring a reader to an out-of-date version of the version 5. 10 10 IOPs7 And you're very clear, are you not, that those are 11 the policies that were in force at the material time? 11 A. I would agree with that, sir, yes. 12 12 A. In my mind, sir, ves. We then see that the reader is referred to "Initial Q. What I want to focus on are SOP 47 v5 and Mr Whittle's 13 13 Response to a Marauding Terrorist Firearms Attack by subsequent plan of 4 May 2017. First of all SOP 47 v5. North-west Region Force Firearms Resources, version 7, 14 14 15 Did you know that v5 was being prepared by 15 5 August 2014", and we could probably spend the rest of the day talking about that document if we were inclined 16 Superintendent Giladi in late 2016? 16 17 17 to, but we won't because I think you can confirm that A. Yes, sir. I knew it was being prepared, or I believed 18 it was being prepared for the HMIC visit. 18 your strong view is that that version of the regional 19 Q. Did you assist in its preparation? 19 policy never came into effect? 20 20 A. That's right, sir. I would tend to suggest that the 21 Q. Did Superintendent Giladi consult you in relation to its 2.1 correct version would be the annex C, either 1.9 or 1.10, I don't know off the top of my head, but yes. 2.2 preparation? 22 2.3 2.3 Q. Again, the reader of this document is being referred to A. No. sir. 2.4 Q. In October of 2016 did you know that in the event of 2.4 a source that is not the correct source? a real-world terrorist attack during which 25 That's correct, sir, yes. 37 39 1 Operation Plato was declared the FDO was likely to 1 $\ensuremath{\mathsf{Q}}.$ Just two points that emerge from that. First of all , do 2 become overburdened with responsibilities? 2 you agree that it might not be regarded as ideal to have 3 A. My strong suspicion, sir. 3 within a plan a reference to a whole series of other Q. And was it your belief that Superintendent Giladi would substantial documents? 5 also have known that fact? 5 A. I fully agree, sir, yes. 6 A. Again, I would strongly suspect he would do. Q. And secondly, even if that is a good idea to do, you 6 7 7 Q. Against that background, can we look at v5 together, ought to refer the reader to the right documents and not 8 8

- please, and so this is $\{\mbox{INQ039970}/1\}.$
- 9 Was the first time that you saw v5 once it had
- 10 actually been created?
- A. I couldn't tell you the date, \sin . When it was done he 11 12 would have sent it to me for the purpose of updating and putting on the intranet, our internal GMP computer 13
- 14 system. 15 Q. So far as you recall, was it sent to you as a finalised
- 16 document or as a draft for your comment?
- 17 A. No, it was sent to me to publish.
- 18 Q. First of all, {INQ039970/2}, please.
- 19 SIR JOHN SAUNDERS: Can you remind me of the date of this, 2.0 sorry?
- 21 MR GREANEY: The date is October 2016.
- 2.2 SIR JOHN SAUNDERS: Thank you.
- 23 MR GREANEY: We can see -- we looked at this yesterday with

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- 2.4 Mr Whittle, and I'm not going to go over all the same
- 25 ground with you, certainly not all of it -- we can see:

- the wrong ones?
- 9 A. That's correct, ves.
- 10 Q. Next, please, {INQ039970/6}.
- 11 (Pause)
- 12 The media is finding some parts of this evidence
- 13 difficult to follow. Probably my fault. I'm asked to
- 14 ask you to confirm one particular thing, which is what
- 15 OCR stands for.
- 16 A. Sorry. It's the control room, it's where the radios
- 17 are, it's where the force duty officer would sit and
- 18 work from.
- 19 SIR JOHN SAUNDERS: OCR stands for?
- 2.0 A. I think it's operational control room. I think.
- 21 SIR JOHN SAUNDERS: It occurred to me -- I was going to say
- 2.2 yesterday we had a huge number of acronyms and actually
- 23 it's almost as quick to give the full title. You've
- 2.4 done it less today than I think happened yesterday.
- 2.5 Just for the listener who doesn't have the documents and

- 1 hasn't the same knowledge of what the background is, 2 I think it would help if we could use the full titles 3 rather than acronyms. 4 MR GREANEY: Sir. I will take that on board.
- SIR JOHN SAUNDERS: It doesn't just apply to you, it applies 5 to everybody. Otherwise you're spending the whole time 6 7 working out what the acronym actually stands for.
- MR GREANEY: We do. Where I know what the acronym stands 8 9 for, it won't be in every case, I will use the full 10 description.
- SIR JOHN SAUNDERS: We do have a list of the acronyms and 11 12 what they mean somewhere? Certainly that could be 13 supplied to the press, which might help them.
- MR GREANEY: It's on the website, I think. Mr Suter is 14 agreeing with me. 15
- SIR JOHN SAUNDERS: Right. But for the person who is 16 17 listening, because they're interested, on the YouTube 18 feed, I think it's pretty difficult to follow.
- 19 MR GREANEY: If it has been difficult for anyone to 20 follow -
- 2.1 SIR JOHN SAUNDERS: It was for my wife! I have had that private information. 2.2
- 2.3 MR GREANEY: I'm extremely sorry to hear that, sir. I take 2.4 responsibility for that and I'll try to do better.
- 25 SIR JOHN SAUNDERS: She hasn't time to listen that often, so

- 1 when she comes in, she tends not to know what anyone is 2 talking about.
- 3 MR GREANEY: So OCR, operational control room. So that's 4 the room the FDO would be in?
- 5 A. Very similar to a room like this, obviously not -- you
- 6 know, with radio operators and they'd be sat at the back 7 in control
- 8 Q. Is the force control room, which is a term I have been
- 9 using, something different from the operational control 10
- 11 A. No, we only have one -- no, you are quite right, they 12 are different . I think we have maybe two or maybe three
- 13 OCRs. I think they're in clusters around Greater 14 Manchester Police.
- 15 Q. We probably don't need to be where they are.
- A. No, I don't know where they are.
- 17 Q. So when I talk about the room where the --
- 18 A. Force duty officer is.
- 19 ${\sf Q}.\ --$ force duty officer is in , or FDO, I should talk about 2.0
- 21 A. Force control room.
- 2.2 Q. The force control room.
- 23 A. That's how I would understand it.
- 24 Q. I probably have confused myself now.
- 2.5 A. Maybe I'm wrong, sir, sorry.

SIR JOHN SAUNDERS: Let's stick with the OCR because that's 2 what everyone's been using so far.

3 MR GREANEY: So we were going to page 6 of version 5 of the

standard operating procedures 47. Could we have page 6 4 5

on the screen, please? It's the bottom of the page, "Force duty officer actions" {INQ039970/6}. 6

7 So yesterday Mr Horwell, who represents Greater

8 Manchester Police, drew our attention to the -- not just 9 the list of actions but also the introduction, which

10 provides

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"The actions of the force duty officer in the initial stages of a marauding terrorist attack are crucial. The following actions are not exhaustive and the FDO will need strong support from the OCB."

Operational communications branch?

- 16 A That's how I would understand OCB
- 17 Q. "Team. Some of the actions are likely to be delegated 18 to OCB supervision."
- 19 So the point Mr Horwell was making there, perfectly 20 understandably, is that within this version of the plan 21 there is a recognition that the FDO will need strong
- 22 support from the OCB team? A. Certainly in that document.
- 2.4 It might be read as suggesting or indicating clearly
- 2.5 that some level of delegation would need to occur?

- 1 A. That's correct, yes.
- 2 Q. But equally, as was acknowledged, there's nothing within 3 this plan to indicate to whom particular tasks were to
- be delegated and you'd agree with that?
- A. That's also correct, yes
- 6 SIR JOHN SAUNDERS: And nothing to say whether they're going
- 7 to be delegated in advance or whether they're going to
- 8 be delegated when something has actually happened?
- 9 MR GREANEY: Exactly.
- 10 There's then a list of tasks for the FDO, which I'm
- 11 certain you'll agree, given your evidence, is a very
- 12 substantial list, which, if the FDO is to do all of
- 13 them, will overwhelm that person.
- A. I think, also as well, yes, if the FDO did them it's 14
- 15 introducing time delays to the other actions that need
- 16 to be created(?) as well.
- $\ensuremath{\mathsf{Q}}.$ You might just need to explain that to me in a little 17
- 18 more detail.

2.4

- 19 A. Could I ask to turn over the page?
- Q. Certainly. Could we go to $\{INQ039970/7\}.$ Is it the top 2.0
- 21 half of the page?
- 2.2 A. Anywhere like that. They need to contact a tactical
- 23 adviser, so pick up the phone and get in touch with the
 - tactical adviser. They have to then put that phone down
- 25 and pick up another and get in touch with the firearms

1 commander. Quite a way down is:

> "Inform emergency services once Operation Plato's been declared.'

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That really should, if I was going to put them in hierarchical order, would be near the top to allow other agencies to work. But is that more important that getting in touch with the senior national coordinator, is that more important than asking for additional support? What I'm trying to say if you did the top one

then you are not doing the bottom one which could be 11 just as important.

12 Q. Whereas if these tasks have been delegated or arranged 13 ahead of time by an action card system, different people 14 are doing these things all at the same time?

15 A. Contemporaneously, yes.

16 Q. So there's is no delay in any one of them occurring and 17 delay might be slightly important in --

18 A. Yes. sir. definitely.

19 Q. -- a situation such as Operation Plato situation? I 20 see, thank you.

21 That's all I wanted to ask you about version 5.

Next I'm going to ask you about the Whittle plan. 2.3 I will begin by asking you about the origin of the plan,

2.4 although I think you've probably covered it in a fair

25 amount of detail already.

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- 1 Sir, I'm going to the first statement, paragraph 44.
- 2 This is page 9 of the statement. We can now start to
- 3 identify with certainty some of the dates you've
- referred to in terms of when you were given the tasks.
- 5 As we know, the hot debrief from the Inspectorate was
- 3 November 2016. Is it the position that it was on 6
- 7 6 April 2017 that you received an email from
- 8 Superintendent Giladi directing you to ask
- 9 Sergeant Whittle to update the Operation Plato plan?
- 10 A. That's correct, yes.
- 11 Q. Were you informed that that was to bring the plan into 12 line with the refreshed Counter-terrorism Police
- 13 Headquarters guidance on Operation Plato?
- A. That's correct, yes. 14
- 15 Q. And within the same email were you provided with the 16 details of a seminar that was to be held in May 2017?
- 17 A. That's correct, yes, I was.
- 18 Q. That seminar to be held by the authors of the new CTPHQ 19 guidance?
- 2.0 A. Correct, yes
- 2.1 Q. So as we know, Inspector Mark Nutter and Inspector
- 2.2 Richard Thomas?
- 23
- 24 Q. I think Inspector Nutter would have been an officer you
- 25 knew very well?

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- 1 A. Yes, he was one of the five to three, he was one of the 2 inspectors.
- 3 Q. What did you, I'm at paragraph 46 now, understand
- 4 Inspector Giladi had been tasked with? 5 A. I believe he was in charge of the whole update, the
- whole process. He was armed policing lead for 6
- 7 Greater Manchester.
- Q. Having received your instruction from 8
- 9 Superintendent Giladi, which you understood had come
- 10 from chief officer ranks, did you in fact task
- 11 Sergeant Whittle with updating the plan?
- 12 A. Yes. I did.
- 13 Q. On Tuesday, 2 May 2017, did you receive a further email
- 14 from Superintendent Giladi?
- 15 A. Yes, sir. I think I referred to this one before.
- 16 Q. And did that email ask for the updated plan because it 17 was to be discussed as part of the Chief Officer Group
- 18 meeting?
- 19 A. That's how I understood it. sir.
- 20 Q. And did you in return ask if it would be acceptable for 2.1 the document to be completed by Friday, 5 May 2017?
- 2.2 A. I did. ves.
- 2.3 Q. And did you then get in touch with Sergeant Whittle to
- 2.4 indicate what was required of him?
- 2.5 A. I did, yes.

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- SIR JOHN SAUNDERS: Had the original instruction to you to 1
- 2 get him to do it given you a time bracket when it had to
- 3 be done by?
- A. I think, sir, if I may, I think Mr Potts, who's one of
- 5 the ACCs, says something like the lines of, "Leor, can
- 6 you get it done for the May COG?"
- 7 MR GREANEY: I should have the reference for the email.
 - After we've had our break I will make sure we have it
- 9 and, if necessary, we'll have a look at that.
- 10 You got in touch with Sergeant Whittle to make plain 11 his document was required, really as a matter of some
- 12 urgency? 13 A. That's right, sir, yes.
- 14 Q. The way in which you put it in your witness statement
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- "This involved a period of approximately 4 weeks 16
- 17 between receipt of the new national guidance and
- 18 creation of the GMP local Operation Plato plan in
- 19 response, which I consider to be quite fast."
- 2.0 A. I do, yes
- 21 Q. And I think we should probably understand from the
- 2.2 evidence you have given today, when you said "I consider
- it to be quite fast", that involves a degree of 23
- 2.4 understatement?
- 25 A. Yes, sir.

- 1 Q. On Friday, 5 May did you receive from Sergeant Whittle
- 2 his new document?3 A. I did, yes.
- 3 A. I did, yes.4 Q. Which had been given the title v2, had it not?
- 5 A. It had, yes.
- 6 Q. What did you understand Sergeant Whittle had created?
- A. He'd created for me, or what I'd directed him to do
- 8 is -- I think you mentioned it yesterday or it might
- 9 have been Dave Whittle. The FDO in his haste or going
- 10 to two or three different documents is not ideal. What
- 11 we wanted to do is we wanted to update annex C of the
- regional plan, which was the response to a terrorist
- 13 attack, and then archive our 47 because everything we
- 14 needed would have been in that one document.
- 15 Q. Just to be clear about this, because it may be that your
- 16 intention was different from the understanding of
- 17 Sergeant Whittle. There were, as we've discussed, in
- 18 existence two policies or plans that dealt specifically
- 19 with marauding terrorist firearms attacks.
- 20 A. Mm-hm.
- 21 Q. There was the regional policy --
- 22 A. Yes.
- 23 Q. appendix C and there was the GMP policy, SOP 47?
- 24 A. That's correct.
- Q. -v5, which dealt, we saw yesterday, with things in

- different terms. Your intention was that there should
- 2 be created a single, unified plan?
- 3 A. That's correct, yes.
- $4\,$ Q. And have I understood correctly that that was a plan
- 5 that would replace both the regional plan --
- 6 A. Yes.
- 7 Q. -- appendix C, and would replace SOP 47?
- 8 A. That's correct, yes.
- 9 Q. So that leaving the overarching plan on one side for the 10 time being, there would then be just a single source of
- 11 information, a single plan for someone with the
- responsibility in the event of an MTFA?
- 13 A. That's right, sir, less directing to different
- documents, one document.Q. So insofar as there is a difference between you and
- Sergeant Whittle, there it is, that it was your
- intention that SOP 47 should be replaced as well as
- 1/ Intention that SOP 4/ should be replaced as well as
- appendix C. He didn't seem to understand that SOP 47
- 19 was to be replaced, but you're clear that it was?
- 20 A. I'm clear it was and I'm not quite sure -- I think
- $21 \hspace{1cm} \hbox{he was confused yesterday. He said both of those} \\$
- things. He said that he thought 47 would still run in conjunction, but then he also said it was the intention
- 24 to create one document.
- Q. Anyway, you're clear about what your intention was?

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1 A. In my mind, yes.

- 2 Q. Bearing in mind that one of the documents that was to be
- 3 replaced was a regional --
- 4 A. Yes.
- 5 Q. -- document, which obviously was a document that was to
- 6 be utilised not just by GMP but by the other forces
- 7 comprising part of the North-west Armed Policing
- 9 you or Sergeant Whittle or anyone else, with the other 10 forces?
- 11 A. We hadn't contacted the other forces, but what we had
- done is we'd spoken to Tim Plumpton, who was the chief
- 13 firearms officer and he also had the policy unit, the
- 14 regional policy unit.
- 15 Q. He was a Cheshire officer, I think?
- 16 A. He was a Cheshire officer, yes. We had spoken to him
- and we had let him know what our intent was and he was
- 18 very supportive of the idea. That's why Dave Whittle
- $19\,$ updated the version 1.10, I believe, and changed it to
- $20 \qquad \qquad \text{version 2 because in our mind it was } -- \text{ I wouldn't say} \\$
- $21\,$ a done deal, but it was going to get approved because
- 22 that's what we had.
- $23\,$ $\,$ Q. So your understanding was that you would do this piece
- $24\,$ of work and that the NWAPC would adopt it?
- 25 A. That's right, yes.

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- 1 Q. I've understood.
- 2 At the time at which you and Sergeant Whittle were
- $\ensuremath{\mathtt{3}}$ developing this plan, you were given the instruction and
- 4 he was developing the plan, have I understood correctly
- 5 that you had no idea that the Inspectorate had said that
- 6 v5 had significant problems ——
- 7 A. No, sir.
- 8 Q. or had problems?
- 9 A. I understand.
- $10\,$ $\,$ Q. Do you know at that stage anything of what had emerged
- 11 from Exercise Winchester Accord?
- 12 A. No, sir. That wasn't fed in either.
- 13 Q. That was?
- 14 A. Not fed in either.
- 15 SIR JOHN SAUNDERS: I still didn't get it, sorry.
- 16 A. It wasn't fed in to us. Sorry, sir.
- 17 SIR JOHN SAUNDERS: Thank you.
- 18 MR GREANEY: I think it's likely that you now know that one
- of the learning points from Winchester Accord was the
- 20 overloading of the FDO?
- 21 A. I do, sir, and I was slightly disappointed yesterday
- 22 when Dave explained, Dave Whittle, that he had
- discovered that via our Fire Brigade colleague,
- 24 Neil Gaskell.
- 25 Q. You said you were disappointed. Do you mean that your

1 view is that your team, the PCU team, the two of you been removed. 2 in the PCU, should have been informed in some more 2 A. It's not in there, sir, no. 3 formal way by your force of the learning points from 3 Q. I think you can probably see how those two matters were 4 Exercise Winchester Accord? 4 capable of causing a problem. A. Well, yes, sir. As I said before, incidents such as SIR JOHN SAUNDERS: Okay, sorry, this is -- the black parts 5 5 that should feed policy, should allow us to develop and on this are what were originally in appendix C. 6 6 7 if we don't know it's broken, we don't... 7 Appendix C included reference to delegation, did it? 8 Q. No. You did know about the --MR GREANEY: I'm not sure --8 9 A. Yes, sir 9 SIR JOHN SAUNDERS: You said it had been removed. That's 10 $Q. \ \ --$ problem with the force duty officer. But as we have 10 what I didn't understand. 11 understood, one of other problems identified was JESIP 11 MR GREANEY: Let me be clear. What I mean is that within 12 12 working, interoperability -the -- vou've understood what I meant. Within 13 13 version 5, as we saw and as Mr Horwell indicated ${\sf Q}.\ --$ but that was not fed into you, as you have said? 14 14 vesterday, there is a reference to the FDO needing 15 A. No. sir. 15 substantial support, or some similar phrase, from the 16 staff within the operational control room or OCB, 16 O Next --SIR JOHN SAUNDERS: And whose responsibility would it be to 17 I think is the term used. Here there is not even 17 18 feed it into you? 18 a reference to that, is there? 19 A. I think it would be events planning. They're the ones 19 20 SIR JOHN SAUNDERS: Thank you. And you were intending it to 20 who, I think, organise those meetings. Without throwing 2.1 anyone under the bus, I think Mr Henderson, who's on 2.1 replace SOP 47 as well? A Yes 22 this afternoon, might be able to answer that question 22 MR GREANEY: Sorry if that wasn't clearer. 2.3 2.3 a little bit better. 2.4 MR GREANEY: Sir, I'm not very far from concluding my 2.4 SIR JOHN SAUNDERS: No, no, that's fine. 25 examination of this witness, but this would be MR GREANEY: You provided the plan to Superintendent Giladi? 55 1 a convenient moment for a break. 1 A. Yes. sir. SIR JOHN SAUNDERS: Okay. Back at quarter to. 2. 2. Q. And as you understood it, he was taking it to a chief 3 MR GREANEY: Thank you, sir. 3 officer meeting? (11.28 am) A. That's right, sir, yes. (A short break) $\ensuremath{\mathsf{Q}}.$ And did you come to understand before 12 May that the 5 5 (11.45 am) plan that had been prepared by Mr Whittle was approved 6 6 MR GREANEY: Inspector, we're next going to look, as 7 7 by your superiors? I indicated, at the Whittle plan itself, albeit not in 8 8 A. Yes, I was, sir, yes. 9 9 Q. Is that why you circulated the plan, along with other any great detail. The INQ reference is {INQ029178/1}. 10 We'll just look at a short passage in order to 10 documents, to officers, including the FDOs, on 11 illustrate some evidence that you gave earlier. Could 11 12 May 2017? 12 we go, please, to {INQ029178/4}. 12 A. That's correct, sir. I don't have the authority to send 13 There are two observations that I would like you to 13 out a policy if it's not been authorised. 14 consider, both of which I suspect you'll agree with 14 Q. We'll look at the email that you sent, and I'm very much 15 15 given what you've said already. First of all. towards the end of my questions now, just to assist 16 notwithstanding that everyone well knew that the FDO was 16 Mr Weatherby, who'll be on next. Your email, which we

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FDO, did it not? 2.1 A. It certainly did. sir. ves.

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2.2 Q. Secondly, whilst not for a moment ignoring your evidence

Operation Plato situation, this version of the plan

added substantially to the responsibilities upon the

23 that your understanding was that a scheme of delegation

liable to be overwhelmed in the event of an

- 2.4 should be introduced, it seems to be the position that
- 25 within this plan the reference even to delegation had

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Q. You agree with that, do you? A. I do.

A. That's correct, sir.

read recently, is $\{INQ039966/1\}$.

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did see yesterday, and which I'm certain you will have

sent to, among others, the OCR duty inspectors.

would have included the force duty officers .

We see your email timed at 13.58 hours on 12 May,

Sergeant Whittle, as he was, told us vesterday that that

- 1 Q. Is it your expectation therefore that this email and the 2 attachments would have been sent to Inspector Sexton?
- 3 A. That would be my understanding, sir, yes.
- 4 Q. I don't propose to read it all out again, I did that yesterdav. 5

Could I just ask you a couple of questions about it, 6 7 inspector? First of all, the version of the Whittle 8 plan that accompanied or was attached to this email had 9 embossed across it the word "draft", and you are aware 10 of that fact. I think?

- A. I am aware of that fact, yes. 11
- 12 Q. Mr Weatherby drew it to our attention yesterday. Do you 13 think that was a potential problem?
- A. I fully agree. I can't give you any reason why I would 14 15 have done that apart from it being a pure clerical 16 error When it would have come back. Dave would have 17 changed the green to black and taken off the test. But
- 18 I have obviously sent the wrong one out and I would 19 fully concur that could have caused confusion.
- 20 Q. The confusion it was capable of creating is that someone 2.1 reading it would think it was a draft and not a final 22 plan and might not therefore understand they were
- 2.3 supposed to implement it?

to do it today.

- 2.4 A. There was the potential for that, sir.
- Q. The potential, and that's a fair way of putting it.

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- 1 Moreover, I don't think within your email you 2 expressly informed the recipients that the Whittle plan 3 was a replacement for appendix C version 1.10 and SOP 47
- 5 A. No, I don't explicitly say that, sir, and certainly after a long period of reflection over the last couple 6 of weeks, I would send the email differently if I were 7
- 9 Q. And I think you're accepting that it would have been 10 better if you had said that expressly, would it not?
- 11 A. It definitely would have done, sir. There would have 12 been no ambiguity.
- 13 Q. Which acknowledges the fact that there was the 14 potential, for those two reasons you've identified, for 15 ambiguity.
 - Let me just ask you this before we move to a small number of final matters: we know, don't we, that Inspector Sexton was in the position of force duty officer on the night of 22 May?
- 2.0 A. Correct. sir.

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21 Q. And had to deal with an awful situation which arose 2.2 shortly after 10.30? A very difficult situation. Which 23 plan would you have expected Inspector Sexton to 2.4 implement on 22 May in that situation of the plans that 25 we've considered?

1 A. In my mind, and the way I understood it, it was this new 2

plan, which David Whittle had completed and I had

- 3 circulated on the 12th. That for me was the plan that 4 was in force
- Q. Although you would acknowledge, I think, that that was 5 not a plan in respect of which anyone had received 6 7 training?
- 8 A. No, sir
- 9 Q. It was a plan that had inadequacies to the extent that 10 we've discussed, overloading the FDO --
- 11 A. Yes.
- 12 Q. -- and no reference to delegation. Let's turn to the 13 final matters and we can deal with these very shortly.
- 14 First of all, you attended, did you not, the
- 15 Counter-terrorism Policing Headquarters training
- 16 delivered by Inspector Nutter and Inspector Thomas on
- 17 8 May 2017?
- A. I did, sir. 19 Q. And you were present for the assurance visit by,
- 20 I believe, Inspector Nutter on 19 July 2017?
- 2.1 A. I was, ves.

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- 22 Q. And we've heard the evidence of Inspector Thomas about 23 those and I don't wish to ask you any more questions
- 2.4 about them
- 2.5 What I do want your help with is this, a separate

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- 1 topic. Yesterday, you were volunteered to assist the
- 2 chairman with a question relating to JOPs 3. The
- 3 question -- and, really, I'll ask it in very general
- terms at the moment, we might need to boil it down into
- 5 separate questions. The issue we want your help with is
- 6 whether JOPs 3, in force from January 2016, provided
- 7 assistance to officers on the ground and/or commanders

armed officers move into a hot zone and there are

- 8 about how they should deal with a situation in which 9
- 10 persons present within that zone assisting casualties.
- 11 I think, sir -- are we able to bring up JOPs?
- 12 Q. Yes
- 13 Α. I had a look yesterday, obviously after direction, and 14 the only part which I can see which I think is
- 15 potentially relevant would be 6.6.
- 16 Q. Shall we put that on the screen as you have invited us to? The reference is {INQ008372/1}, and the paragraph 17 18 to which you have directed our attention, inspector, is
- 19 $6.6~\{\mbox{INQ008372/25}\}.~$ So edition 3, January 2016, and 2.0
- it's page 25. 21
- Shall I just read out paragraph 6.6 and then you can 2.2 give whatever evidence you want to in relation to it?
- 23 "During the course of an attack uninjured people may 2.4 not wish to leave casualties. Given the hazardous 25
 - nature of warm zones it is necessary that bystanders be

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directed to leave the scene by the safest and quickest route possible. It should be recognised that friends and relatives of casualties may not want to do that. Where bystanders refuse to leave and are actively treating casualties then advice should be given on treatment and dressings provided (there may be off—duty emergency service or NHS staff or trained first—aiders at the location)."

I'll just conclude that paragraph:

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"The control of uninjured people at the scene is not a primary concern of the Ambulance Service, and at no time should emergency responders allow bystander activity to distract them from treating the maximum number of casualties possible. Warm zones are areas that cannot be declared safe. Those able to do so should be directed to leave by the quickest route to avoid injury or death in the event of the realisation of a residual threat."

So bearing in mind the issue that the chairman raised yesterday and on other occasions, what would you wish to say to us about paragraph 6.6?

A. I would say from the operators' perspective, that being the people on the ground going into these different warm zones, so firearms officers, for example, they would be giving that general advice for members of the public to

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leave by the safest route, going probably -- the way behind. That is what I would expect the firearms officers , for example, to be doing.

The commander — what I would expect the commander to be doing is, using his national decision model, actually deploying his firearms officers towards that red zone so they can confront and neutralise any threat that there's that. That way, what ewe would be able to do is either —— I think Dave Whittle said about reducing the size of that red zone, thereby allowing the warm zone behind it to have more specialist people going in to save people and/or if we neutralise the threat, that it would be completely cold and we could go in.

SIR JOHN SAUNDERS: Nothing about that situation arising in the hot zone?

16 A. No, sir.

17 MR GREANEY: Inspector, thank you very much indeed. Those18 are my questions, certainly at this stage.

19 Sir, unless you have anything you wanted to ask at 20 this point.

SIR JOHN SAUNDERS: I asked this of Mr Whittle: what we have looked at today with you and we looked at with other people is the failure, apparently, to do anything systematic to cope with the overloading of the FDO, despite the fact it had been shown up on exercises, and

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from what you have said, being generally recognised as 2 a problem. I'm just wondering what the reason for 3 that is. An obvious reason, or a possible reason, 4 is that people just did not expect this sort of 5 happening for real, otherwise they'd have done something about it. So do you think that is possible, that people 6 7 just didn't think it was going to happen? A. I think ... It's a very difficult thing to say for other 8 9 people, sir. Certainly from the department where 10 I worked, I think it was a very real threat. And 11 we were certainly trying to do our best to get 12 ourselves, for want of a better word, match fit. We always engaged with exercises and I think there were 13 14 exercises which we did with our partners (inaudible: 15 distorted) in the month or two before the exercises. So 16 certainly from our level, we were certainly aware and

18 SIR JOHN SAUNDERS: Thank you. I accept you can't talk for other people.

we were certainly trying to do our best.

20 MR GREANEY: Thank you, sir.

Inspector, you're now going to be asked questions by
Mr Weatherby on behalf of the bereaved families. Can
I again invite you to be close to the microphone so that
everyone, including Mr Weatherby, is able to hear you,
thank you very much.

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Questions from MR WEATHERBY

2 MR WEATHERBY: Mr Lear, can you hear me and see me?

3 A. I can do, sir.

4 Q. Thank you. You've been very frank this morning about 5 the under—resourcing of the Policy and Compliance Unit 6 during this period, and may I preface my questions by 7 saying obviously that wasn't your fault; you were at the 8 sharp end of that under—resourcing.

9 A. Thank you, sir.

Q. But you've told us that you raised this under—resourcing during this period in forthright terms; is that right?

12 A. That's correct, sir, yes.

Q. The lan Terry tragedy, I think you mentioned early on in
 your evidence, and of course there was the further
 tragedy of the Anthony Grainger shooting in 2012. The

16 background is the Greater Manchester Police Firearms

Unit and policy, throughout the whole of this period,

Onit and policy, throughout the whole of this perio

 $18\,$ from 2008 to 2017 and further, was one of great

19 scrutiny, wasn't it?

 $20\,$ A. It definitely was, sir, yes.

Q. Yes. Would you therefore agree that the chronic and
 serious under-resourcing of the Firearms Policy Unit is

23 difficult to understand in that context?

A. I agree with you, sir. Certainly when you compare it tothe resources when it was created.

- $1\,$ $\,$ Q. Can I just ask you a little more on this. You raised it
- 2 in forthright terms, which you told us about earlier,
- 3 with effectively your line manager, Mr Giladi; yes?
- 4 A. Yes, correct, sir.
- Q. Did you raise it with anybody else? I'm not suggestingyou should have done, I'm just asking.
- 7 A. No, sir, not to my memory or my knowledge.
- 8 Q. Can you recall, was this in a meeting with Mr Giladi?
- 9 A. It would have just been talking to him, sir. I don't
- think it was an agenda item or anything like that, it would have just been a discussion between ourselves.
- 12 Q. Would it have been on one occasion or more than one occasion?
- 14 A. I certainly remember talking to him on at least one
- occasion, but it was quite evident from what I was doing that I was working at full capacity.
- 17 Q. Yes. And what was Mr Giladi's response to you about18 your concerns?
- 19 A. He was always very supportive and said he'd raise it.
- $20\,$ $\,$ Q. So he said he'd raise it . Did he give you feedback
- $21\,$ about that? Did he take it to the chief officers and
- $22\,$ then come back and say, "Sorry, there's no further
- 23 resources", or, "We're looking at it", or anything like
- 24 that?
- 25 A. Certainly nothing happened.

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- $1\,$ $\,$ Q. Okay. So he gave you sympathy, said he'd take it
- 2 elsewhere, but in fact nothing came back to you?
- 3 A. He may well have done, sir, but, no, nothing came back 4 to me.
- Q. And ultimately, you left this area of your work becauseof the overwhelming nature of it?
- 7 A. That's a fair assumption, sir, yes, I did. I did.
- 8 Q. Thank you.

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- 9 I want to move to a different topic and some of 10 these topics I'll deal with very briefly because 11 Mr Greaney's helpfully dealt with them in some detail 12 already.
 - Can I just deal with the issue of version 5 and version 2, so the Giladi final version of the SOP 47 and the new Whittle document of 4 May, Mr Whittle's new document. There is a difference of understanding between you and Mr Whittle about what the role of
- between you and Mr Whittle about what the role of version 2 was; is that fair?
- A. Yes, that is a fair assumption, certainly from his evidence yesterday.
- Q. So your instruction to him was to use the national
 guidance to rewrite the middle tier policy, the regional
- policy, but to then make that supersede not only the
- regional policy but also the version 5? So that was
- $25\,$ your intention at the time. Do you agree that it's
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- 1 imperative that the person who tasks such a review and
 - the person who undertakes that review have the same
- 3 understanding on something as basic as that?
- 4 A. 100%, sir. I'm sure that Dave has made a mistake,
- 5 David Whittle yesterday in his head has made a mistake.
- 6 He mentioned yesterday, as I've already said, what our
- 7 intention was, which was to bring one document
- 8 altogether, so it wouldn't have made sense to bring the
- 9 document altogether and then have the residual document.
- 10 Q. Prior to 4 May, when he rewrote the document, it's
- 11 common ground between you that version 5 and
- version 1.10, so the SOP 47 version 5 and the previous
- 13 version of the middle tier regional document, they
- 14 co-existed?
- 15 A. That's correct, sir.
- 16 Q. (Overspeaking). Now, those overlapped in terms of --
- 17 A. Yes, sir. Sorry.
- $18\,$ $\,$ Q. And that's the reason why you wanted to bring them
- 19 together with this new policy?
- 20 A. That's definitely -- yes, sir. So rather than having
- 21 two separate policies to go to, let's have it all in one
- 22 place.
- $23\,$ $\,$ Q. So can you help us: prior to 4 May, which was the policy
- that the FDO and others were to go to prior to 4 May?
- 25 A. It would have been exactly as you just said there, sir.

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- $1\,$ $\,$ $\,$ It would have been the SOP 47 in conjunction with the
- 2 cross—border annex C.
- $3\,$ $\,$ Q. Mr Greaney has taken you to the email of 12 May, your
- 4 email rolling out the new policy.
- 5 A. Yes, sir
- ${\sf 6} \quad {\sf Q}. \;\; {\sf And} \; {\sf you've} \; {\sf referred} \; {\sf to} \; {\sf there} \; {\sf being} \; {\sf an} \; {\sf ambiguity}, \; {\sf an}$
- 7 unfortunate ambiguity, I think would be a summary of
- 8 what you said in that email; yes?
- 9 A. Yes. sir . I agree.
- $10\,$ $\,$ Q. Can we just have it up on the screen again, Mr Lopez,
- 11 please? It's {INQ039966/1}
- You have seen this recently, you've had a chance of
- refreshing your memory about it, haven't you?
- 14 A. I have, thank you.
- 15 Q. The email not only failed to mention that version 5 no
- $16 \hspace{1cm} \hbox{longer applied, I think I'm right in saying that there} \\$
- was actually no reference to SOP 47 version 5 at all.
- 18 A. That's quite correct, no, there isn't.
- 19 Q. As we've been through, and Mr Greaney has recently
- 20 referred to, the version 2 document that was attached.
- 21 Although it was the fully rewritten document, it was
- 22 clearly marked "draft" on each page.
- 23 A. It clearly was, sir. I can't point any fingers at
- 24 anyone else apart from myself.
- $25\,$ Q. If I may say so, that's very fair of you. I'm not

trying to be too critical, I'm just trying to establish the facts as would be known to the other commanders.

Looking at that email now, and the fact that version 5 is not mentioned at all and the fact that the version 2 document attached is marked "draft", it's not a matter of ambiguity, is it, Mr Lear? It's just simply the commanders would have no idea that version 2 was replacing version 1.10 and version 5, and that was the one that they were to follow?

- 10 A. In my head (overspeaking) sorry.
- 11 Q. You answer, officer, please.

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A. In my head, sir, I'd sent this email out and —— I don't know, I can't explain it, I've reflected so much on this particular email. For me, it will also provide the opportunity for commanders and advisers to consider and discuss the revised da da policies which are there. For me it was done, and I fully admit that if I was going back with hindsight, with what I know now, I would be as clear as I could be. If it raised ambiguity or people didn't understand, nobody got back in touch with me. I'm not using that as an excuse, but I'm just being as (inaudible: distorted) as I can be. The only time this was brought to my attention that it could have caused ambiguity, or however we want to phrase, it was last year when I had to write a statement. So for 3 or

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- 4 years in my head it did its purpose, but obviously not...
 - Q. Sure. But this could be an email that the recipients read and effectively treated it as a consultation: this is what we're going to discuss, this is a draft policy? It doesn't state that this is the policy that you must apply from today, 12 May, does it?
- 8 A. No, sir, and that's what I'm saying. If I had the opportunity to write it again, I would be as clear as 10 I could.
- 11 Q. That's very fair, thank you very much. Can we take that 12 down, Mr Lopez, please?

Turning back to version 5 for a moment, can you help us with whether in fact version 5 was itself actually approved? You've told us that you weren't asked about version 5, that Mr Giladi undertook that revision himself. But can you help us with whether it actually was approved?

was approved?
A. For me, sir, Mr Giladi is the person who approves it, so
he would have sent it to me as a read document. The

normal scheme of things would have been for me to get somebody to approve it — sorry, review it and for me to

send it to him for approval for want of a better word,

24 to authorise it . But this time it has come straight

25 from him

70

- 1 Q. So you assumed that because it had come straight from him, not unreasonably, that it had been approved?
- 3 A. Yes, sir
- 4 Q. I'm going to ask you about the approval process in
 5 a moment, but can I just digress for a moment and ask
 6 you to look at another email, which I think you've
 7 looked at recently again.

8 {INQ016884/1}. You have seen this recently, haven't you? This is the email or this is an email trail that relates to the NaCTSO guidance coming through following the Westminster Bridge attack in March 2017, which led to the revision of the GMP Plato policy that we're discussing. That's right, isn't it?

- 14 A. I have seen that email, yes, sir.
- 15 Q. The top email that we can see is from Jo Hoyte, who at that time was North—west Counter—terrorism Unit.
- 17 A. I believe she was.
- $18\,$ $\,$ Q. And it's to Mr Henderson, who we'll be hearing from this

19 afternoon. This email thread relates to a search for

- what the extant, the existing Plato policies at GMP were at the time; is that right?
- 22 A. That's correct, sir, yes.

10

11

- $23\,$ $\,$ Q. The search seems to have led to the belief that the most
- 24 up-to-date GMP Plato plan was the North-west Armed
- Policing Collaboration version 1.4, which had attached

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- $1\,$ the appendix C version 1.10 that we've been considering.
- 2 A. That would appear to be her belief. What I think may
- 3 have happened is she's gone and asked Simon Wright, who
- 4 historically updated the Op Plato plan, she's spoken to
- 5 him and her task is to update the communications part of
- 6 it . On the old SOP 47 there's no comms. I think what
- 7 she was tasked with updating was the bit on that policy
- there which was relevant about the back—to—back channels
 and the hailing channels when host forces come in.
 - I think, and as I say I don't know, this is all assumption and surmise, I believe that that is the
- policy that she needs to update for comms.
- 13 Q. Right. Well, whatever the position of what her role was in updating it, correct me if I'm wrong, but the thread
- appears to be whatever her task was, it appears to have
- been identifying the existing GMP Plato plan that was to
- 17 be worked on and there is simply no reference, unless
- 18 I've missed it, to SOP 47 version 5.
- 19 A. There's not in that email there, sir, no.
- 20 Q. No. So it appears that the GMP systems have been
- 21 interrogated and you can see on the second line
- reference to "the intranet site/force policy/firearms
- policy". And it appears that the SOP 47 version 5
- simply hasn't been found on this search.
- $25\,$ A. I'm not interpreting it that way, sir . I'm interpreting

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- 1 that she's been tasked to update the comms plan and the
- 2 comms plan is in the north-west regional as opposed to
- 3 the SOP 47. That's how I'm interpreting it, I'm sorry,
- 4 sir.
- 5 Q. Right. It's your evidence that matters, not my
- 6 questions, so I'll leave that point there. But can you
- 7 just help us on -- that's why I'm asking you about
- 8 whether version 5 was actually approved. Are you able
 9 to help us beyond Mr Giladi we can take the docum
- to help us beyond Mr Giladi —— we can take the document
- down now, thank you very much, Mr Lopez.Can you just help us? Apart from it being sent to
- 12 you and you assuming that it was approved because
- 13 Mr Giladi had sent it to you, are you able to say who
- 15 Wil Giladi had sent it to you, are you able to say will
- $14 \hspace{1cm} \hbox{had in fact approved it?} \hspace{0.2cm} \hbox{Was it simply Mr Giladi?}$
- 15 A. Yes, sir . That's how I understand it.
- Q. Can you help us then with what the process of approval
- of these policies was within Greater Manchester Police and the audit trail?
- 18 and the audit trail!
- A. Normally, as I said, what we would normally do witha policy, be it either on a yearly basis and/or if
- a policy, be it either on a yearly basis and/or if something significant happened, then we would then
- review our policy. What would normally happen is
- 23 somebody who works for me would normally review them.
- send them to me, and I would send them to the head of
- 25 firearms, for GMP that was obviously Mr Giladi, for the
 - 73
- $1 \qquad \quad \mathsf{purpose} \ \mathsf{of} \ \mathsf{his} \ \mathsf{approval} \ \mathsf{and} \ \mathsf{he} \ \mathsf{would} \ \mathsf{return} \ \mathsf{them} \ \mathsf{back} \ \mathsf{to}$
- 2 me to post the latest version on the force intranet
- 3 site.
- $4\,$ Q. Right. There was mention earlier of the Chief Officers'
- 5 Group.
- 6 A. Yes, sir
- 7 Q. You task somebody to review, they review, pass it to
- 8 you, you look at it. If it appears to be okay, you then
- 9 send it up the line to Mr Giladi?
- 10 A. Yes. sir.
- 11 Q. Do you actually know what the process is once Mr Giladi
- 12 gets it?
- $13\,$ $\,$ A. I believe Mr Giladi has the authority to sign off
 - a policy and send it to me back.
- 15 Q. Right. Is that process written down anywhere? Is there
- 16 a --

14

- 17 A. I can't recall ever seeing it written down, sir.
- 18 Q. Is this a process with an audit trail? To answer my
- earlier question, how could we in fact know that
- version 5 was in fact approved and brought into force?
- $21\,$ $\,$ A. I don't know, sir. I'm not quite sure whether IT can
- 22 see previous policies that have been published as 23 complete —— I don't know, sir, I really don't know.
- Q. Moving on to version 2, Mr Whittle's document. He
- reviewed it, came to you on the 5th, you sent it on to

- 1 Mr Giladi on the 5th, and then on the 12th you send it
 - out to recipients that we'll come to in a moment. But
- 3 between those two times, what happened so far as you can
- 4 recall?

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- 5 A. The way I understand it, sir, is that Mr Giladi needed
- 6 the document to take to a Chief Officers' Group meeting,
- 7 where he would discuss it. I believe he took it there
- 8 and discussed it.
- 9 Q. Right.
- 10 A. That's what I understand, sir.
- 11 Q. So referring to paragraph 54 of your first statement,
- 12 I think you say there that your honest belief was that
- the Whittle document was in fact approved, but there is
- in fact no evidence that it was approved. You've not
- been able to find any audit trail for that?
- 16 A. I have searched all my emails. I can't see the return.
- 17 GMP systems -- and I don't want to be critical,
- 18 aren't -- the IT systems aren't the best ever, and the
- 19 emails you can only save so many -- I think it's
- 20 500Mb -- and I can't find it on my emails, sir.
- 21 Q. Would you agree that a policy which deals with the use
- of lethal force, there should be no doubt as to whether
- 23 it has been approved?
- 24 A. Lagree, sir, ves.
- 25 Q. And there should be an audit trail that you and

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- 1 everybody else can see to show it has been approved and
- 2 by whom?
- 3 A. That's right, sir, yes, I agree with you.
- 4 Q. And there should be documented a date from when it's
 - actually in force?
- 6 A. Yes, sir.

5

- $7\,$ Q. And there should be a clear documentation of any policy
- 8 that the new version supersedes and takes out of force?
- 9 A. Yes. I understand what you're saving, ves.
- 10 Q. So there should be documentation about all of that?
- 11 A. Yes, sir
- 12 Q. And so far as you're aware, there isn't?
- 13 A. So far as I'm aware, sir, apart from me sending it to
- 14 Mr Giladi to take to the Chief Officers' Group, I can't
- find anything that's come back down the chain.
- 16 Q. So a commander who is looking for which policy was in
- force might find version 5, for example, but there'd be
- nothing on the systems, so far as you're aware, to show
- 19 that it wasn't in force?
- 20 A. I'm sorry, sir, could you just repeat the question?
- 21 I don't understand.
- 22 Q. Yes. The point I was putting to you is that one of the
- things that ought to be documented is that where a new
- policy or a rewritten policy supersedes another policy,
- so here version 2 supersedes version 5 amongst other

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- 1 things --
- 2 A. Yes.
- 3 ${\sf Q}.\ --$ there should be a clear means of operational
- 4 commanders being able to see that version 5 is no longer
- 5 in force?
- A. Yes, I agree, sir. Version 5 would have been taken off 6
- 7 the intranet site.
- ${\sf Q}.\;$ Again, is there any -- do we know that? Is there any 8
- 9 record of it?
- 10 A. I don't think so. sir.
- 11 Q. Did you ask for it to be removed?
- 12 A. I remember speaking to Dave Whittle, when we sent the 13 forms in, saying, "Yes, that's now approved it", so
- 14 I believe I did, sir.
- 15 Q. You believe you asked for version 5 to be removed from
- 16 the intranet?
- 17 A. I believe I did, sir, yes.
- 18 Q. But orally, no documentation?
- 19 A. No. sir.
- 20 Q. Where a policy is approved, is there any process, any
- 2.1 recognised process within Greater Manchester Police as
- 2.2 to how a newly approved policy is rolled out?
- 2.3 A. No. sir.
- 2.4 Q. There's no document we can go to and see a process as to
- how a new policy is rolled out?

- 1 A. Not that I'm aware of, sir.
- Q. So when you sent a new policy up the line and it came
- 3 back signed by Mr Giladi as approved, then you would ask
- for it to go up on the intranet?
- 5 A. That's correct, yes.
- 6 Q. Which is the internal Greater Manchester Police --
- 7 A. That's right, sir. Yes, sir.
- 8 Q. So what else? How do officers know when there has been
- 9 an amendment to a policy or there has been a rewrite or
- 10 indeed a new policy?
- 11 A. I see where you're coming from. Unless it was
- 12 a significant change, and obviously I'm looking at the
- 13 last email —— but unless there was a significant change,
- 14 it would just be posted on the intranet.
- 15 Q. Please don't think I'm criticising you; I'm trying to 16 explore the process here.
- 17 A. I understand, sir.
- 18 Q. With respect to the work that you did, when there was an
- 19 amendment, possibly just a change to contact details,
- 2.0 but requiring an amendment to a policy, or where there
- 21 was a rewrite which added substantially or not to an
- 2.2 existing policy, or when there was a completely new
- 2.3 policy, effectively it was down to your judgement in the
- 2.4 very limited time you had as to how you rolled it out?
- 25 A. Correct, sir, yes.

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- 1 Q. In the particular context of version 2, you sent the
- 2 email that we've looked at to staff that you'd selected
- 3 with the new version?
- A. That's correct, yes. 4
- 5 Q. Under that process, if I can call it that, the only way
- that officers would know about the start date for the 6
- 7 new version or the new policy would be (a) if they were 8
- 9 A. Correct.
- 10 Q. And (b) if the email contained a clear reference to the 11
 - start_date?
- 12 That's right, sir, yes. Α
- 13 Q. In terms of training on new or rewritten policies, was
- 14 there any similar process to that which I've been asking
- 15 you about in terms of training? Was there any set-down
- process when a new or substantially changed policy was 16
- 17 rolled out for how it was to be trained?

a recipient to that email?

- 18 A. There would be. That would be contained under the
- 19 National Police Firearms Curriculum and that was the job
- 20 and the role of, as I said, the chief firearms
- 21 instructor, who was based in Cheshire, Runcorn. That
- 22 would come out -- certainly they would control the
- 2.3 regionals' training and that would be what we delivered.
- 2.4 So there would be an audit trail for that?
- 25 A. Yes, there would be

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- Q. Okay. Let's, if I may, drill down into that a little 1
- 2 more. When we are looking at SOP 47 version 5, ie GMP
- 3 policy, when Mr Giladi reviewed and rewrote SOP 47,
- should there be an audit trail for how that was trained?
- 5 A. That would have only taken part in the command training,
- so the email like what I sent out, it would have formed 6
- 7 the basis of that new training there. We wouldn't have
- 8 changed the policy this month and trained it next month.
- 9 It wouldn't have happened like that.
- 10 Q. I have not got to version 2 yet, I'm still with
- 11 version 5 and Mr Giladi's rewrite in October 2016. But
- 12 we'll come on to it in a moment. As I understand it, he
- 13 reviewed that for the purposes of the HMIC inspection or
- 14 review?
- 15 A. That's how I --
- 16 Q. Once he'd reviewed that, that would have been, on your
- 17 evidence, should have been, posted to the intranet?
- 18 A. Yes. That's right, sir.
- 19 Q. Was it in fact sent out to firearms or other commanders,
- 2.0 do you know?
- 21 A. Certainly not by me. sir. no.
- 2.2 Q. So it may or may not have been circulated on an email
- 23 similar to vour 12 May one?
- 2.4 Possibly, but it didn't come from my office. If
- 25 Mr Giladi's done it, I don't know...

- 1 Q. It didn't come from your office. Did you see any such 2 email -
- 3 A. No.
- $\mathsf{Q}. \ \ -- \ \mathsf{rolling} \ \mathsf{it} \ \mathsf{out}?$ 4
- A. Not from memory, sir. 5
- Q. No doubt somebody can check that. But once that was 6
- 7 brought into force, apparently in October 2016, then
- 8 commanders in particular who were to operate it would
- 9 have to know about it?
- 10 A. They'd have to know that version 4 has changed to 5.
- 11 Q. Yes. But you're not aware of whether they did or they 12 didn't?
- 13 A. I don't know, sir, no.
- Q. And you're not aware whether any changes within 14
- 15 version 5 were trained?
- A. I don't know what the versions were -- the differences 16 17 or what was changed.
- 18 Q. Moving swiftly on then to version 2, we know from your
- 19 earlier evidence, I think, that it was sent out, as
- 20 we've seen, on 12 May, but there was certainly no
- 2.1 training on it prior to 22 May.
- 2.2 A. No, sir, no.
- Q. And in fact, I think again in your statement you fairly 2.3
- 2.4 concede that in fact, given the extent of it, it's quite
- 25 likely the recipients may not have read it before

- 1 22 May.
- 2 A. That's a distinct possibility . If you were to look at
- 3 each document individually, each one is quite
- a substantial document.
- 5 Q. But it was in force, so far as you're concerned, as of
- 6 12 May?
- 7 A. That's right, yes, sir, it is.
- 8 Q. Having been through that, can I just return to -- give
- 9 you one more chance to help us. How were commanders and 10 other officers meant to know which Plato policy was in
- 11 force and that they had to follow at 22 May?
- 12 A. It would have been, as I said, published on the intranet
- 13 site under the force policy unit or the firearms policy
- 14 unit.
- 15 Q. You've told us that version 5. or in fact vou've
- 16 indicated in your statement, paragraph 25 of your first
- statement, that Mr Giladi prepared version 5 for the 17
- 18 purposes of the HMIC review.
- 19 A. Yes, sir.
- 2.0 Q. Was it normal to review and amend a policy such as this
- 2.1 prior to an HMIC review?
- 2.2 A. I can't really comment. I've never been involved in
- 23
- 2.4 Q. I'll deal with the point swiftly. If you can't answer,
- 25 please just say. That would mean that the Inspectorate

- 1 were reviewing policies which had not been operational; 2
 - ves?

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- 3 A. Possibly, sir.
- 4 Q. Yes. Shouldn't a review be of operational policies
 - which have a history of being operated and then they can
- be improved in the light of HMIC review and feedback? 6
- SIR JOHN SAUNDERS: Mr Weatherby, I think I'm going to ask 7
- 8 you to ask that of somebody else. The reason for
 - that is this: I don't think we know whether the
- 10 Inspectorate were actually aware it had only recent come
- 11 into being and, if they knew, the point falls away
- 12 a bit. doesn't it?
- 13 MR WEATHERBY: Yes, I have taken the point too far with this
- 14 witness, I fully agree.
- 15 MR GREANEY: They must have known because the document is
- dated October of 2016 16
- MR WEATHERBY: Yes. And likewise. I was going to ask 17
- 18 whether HMIC had been supplied with the version 1.10
- 19 document, but equally that's not a question for this
- 20
- 2.1 SIR JOHN SAUNDERS: And if we haven't got anyone who's
- 22 dealing with it, we can perhaps check if you'd like that
- 2.3 checked.
- 2.4 MR WEATHERBY: Yes, that would be useful.
- 2.5 I just want to show you a document, I think I know

- 1 the answer, but I want to make it so that there's no
- 2 room for doubt here. Your recollection is that nothing
 - came back to you from the HMIC review; is that right?
- A. I can 100% certainly say to you, sir, I didn't receive
- 5 it. I received the written feedback, Saturday I believe
- 6 it was, in a new bundle, but before that I'd not seen
- 7 any of it.

3

- 8 Q. Just for the avoidance of doubt, let me just refer to
- 9 that. So vesterday you will have seen me put the
- 10 handwritten debrief note from 3 or 4 November?
- 11
- 12 Q. But then there was much more detailed feedback that
- 13 we've got. I just want to put it on screen and you can
- 14 just confirm that that's the document you were just
- 15 mentioning.
 - ${INQ008345/1}$. Is that the document that you're
- 17 referring to that you saw only last Saturday?
- 18 A. That's right, 2 or 3 days ago. It certainly looks like
- 19

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- 2.0 Q. Okay. Just for the record, as I understand it, this is
- 21 the HMIC more detailed feedback that was dated
- 2.2 20 December 2016 -- that comes from the Opus heading --

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- 23 and that includes much more detailed feedback and the
- 2.4 answer to questions that my team have not been able to

2.5 find the questions, but this is the feedback that came

- 1 from the HMIC review of the Greater Manchester Police
- 2 Plato policy. Is that your understanding?
- 3 A. It is, sir. In the version which I had, I think the 4 first two pages were the answers and the bottom two
- 5 pages were the corrections, a little bit around about face.
- 8 because you hadn't seen it until last Saturday. That's
 - just a measure of the stuff that would have been useful
- $10 \hspace{1cm} \hbox{to you given that you were tasking Mr Whittle to review} \\$
- 11 the Plato policies; is that right?
- 12 A. It would have been useful. I think most of the
- $13 \hspace{1.5cm} \text{learning, if that's what you want to call it, was fed} \\$
- 14 into the March circular, so I think we've captured most
- $15\,$ of it , but not all and I do concede that had we received
- that, then we would have reviewed it again. I did
- ask the GMP solicitor when that arrived, and apparently
- $18 \hspace{1cm} \hbox{the document that we have in front of us arrived in,} \\$
- 19 I think it was. November or December 2017.
- Q. Right. Well, in fact, the date we've got on it is
 20 December 2016, so maybe that can be clarified by
- somebody else.
- $23 \hspace{1cm} \hbox{Thank you very much, Mr Lopez, we can take that} \\$
- 24 down.

9

I was going to take you through some of that, but as

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- 1 you didn't have it at the time, I won't, but just to
- 2 make it clear that I'm not making a bad point that some
- 3 of the points raised by HMIC were in fact dealt with and
- 4 some of them weren't.
- 5 A. Yes.
- 6 $\,$ Q. In terms of the circulation of Mr Whittle's version 2,
- 7 you circulated it to a selection of commanders, yes --
- 8 A. Correct, yes.
- 9 $\,$ Q. $\,$ -- on 12 May? How did you decide who it went to and who $\,$ 10 $\,$ it didn't go to?
- 11 A. The email talks about it being command training, the
- commanders, basically, so it's all firearms commanders.
- So that's from the strategic firearms commander at the
- very top all the way through to the operational firearms
- 15 commander at the bottom.
- $16\,$ $\,$ Q. Right. So the thought process was that it was to go to
- 17 all Greater Manchester Police firearms commanders,
- 18 including FDOs?
- 19 A. That's correct, yes.
- 20 Q. What about unarmed commanders or commanders of unarmed 21 officers?
- Z 1 Officers !
- A. If I can bring you back slightly to the discussions that
 we had almost at the beginning of my interview or
- evidence. The way I understand it, Mr Giladi was the
- central peg: I was going to deal with the SOP, for want

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- $1\,$ $\,$ of a better word, communications was going to go to one
 - side, and the education of unarmed staff was somebody
- 3 else's. I was under the impression that it was
- 4 Mr Giladi's responsibility.
- $5\,$ $\,$ Q. That's where I was headed next. So you're the Firearms
- 6 Policy Compliance Unit at the time?
- 7 A. Correct.
- 8 Q. So your responsibility is to send it out to firearms
- 9 commanders and you viewed it as Mr Giladi's call as to
- 10 where else it went?
- 11 A. Well, yes, sir, in a nutshell.
- $12\,$ Q. Would you agree with me, given that you were involved in
- 13 this document, that it refers to the roles of unarmed
- 14 officers and indeed partner agencies?
- 15 A. It does, sir, yes.
- 16 Q. Therefore it would be very important that both unarmed
- 17 officers and partner agencies would either see this
- policy or see some summary of it?
- $19\,$ A. I agree with that, sir . A halfway house, I would say,
- $20\,$ rather than this policy . I would tend to suggest that
- $21 \hspace{1cm} \hbox{the Dave Whittle policy is a tactical--based policy to} \\$
- $22\,$ deal with an issue, but I do fully agree with you.
- 23 I think there's an annex which explains the unarmed
- staff's responsibility, the EHCR(?), et cetera, and I do
- think that could have been circulated.

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- $1\,$ $\,$ Q. Am I right that so far as you are aware there is no
- 2 evidence that such any circulation or summary of it was
 - sent to unarmed commanders or partner agencies?
- 4 A. Certainly not to my knowledge, sir, no.
- 5 Q. Okay. Can I move swiftly on to a different topic then.
- 6 You will have seen me ask Mr Whittle questions about the
- 7 version 2 document and I'm not going to repeat those
- 8 questions but there are one or two areas that weren't
- 9 clear, certainly to me, and I just want to ask you about 10 those.
- U tnose.
- 11 You may recall I was asking him about the different
- $12\,$ roles from the FDO and the operational firearms
- commander and the ground—assigned tactical firearms
- 14 commander and others from the --
- 15 A. Yes, sir.

3

- 16 Q. -- version 2 document; yes?
- 17 A. Yes, sir
- 18 Q. In terms of the operational firearms commander, the
- version 2 indicates that he or she is to remain at the
- $2\,0\,$ forward control point or the rendezvous point until
- 21 relieved by a ground—assigned tactical firearms
- 22 commander; yes?
- 23 A. Yes, sir
- $24\,$ $\,$ Q. That would mean, presumably, that the role of the
- 25 operational firearms commander at the scene was not to

- $1 \qquad \quad \mathsf{take} \ \mathsf{part} \ \mathsf{in} \ \mathsf{the} \ \mathsf{actual} \ \mathsf{confrontation} \ \mathsf{or} \ \mathsf{search} \ \mathsf{for} \ \mathsf{the}$
- 2 marauding terrorist but to locate him or herself at the
- 3 forward command post or rendezvous post; yes?
- $4\,$ A. Quite possibly, sir. It could well be that on a team
- $\,\,$ there could be multiple, two, three, four OFCs, and
- that's a rule. The purpose of it is so a firearms commander can actively engage with the joint
- 8 decision making.
- 9 Q. Yes. Okay, if there was more than one operational
- firearms commander -- I don't think there was on 22 May,
- $11 \qquad \quad \text{but we' II } \text{ come to that in due course } -- \text{ but there would} \\$
- 12 be an operational firearms commander who would go to the
- scene and go to the rendezvous point or the forward
- command post until relieved by the ground—assigned
- 15 tactical firearms commander; yes?
- 16 A. That's correct, yes.
- $17\,$ $\,$ Q. Mr Whittle seemed to suggest that the FDO would set, in
- practice, a rendezvous point and the operational
- 19 firearms commander would go there. Do you agree with
- 20 that?
- 21 A. It could be. It needs to be slightly flexible, but the
- FDO could send him to an RV point to meet with the other
- 23 services when they arrive.
- 24 Q. Yes. This is the bit that I'm unclear about: who
- determines where the forward command post should be?

- 1 A. I think it would be a discussion with the tri parties
- when they turn up. Obviously it has to be very fluid
- 3 and flexible based on the circumstances around. The way
- 4 I understand it, and if I am wrong I do apologise, but
- 5 the way I understand it is the commanders on the ground
- 6 who will determine where the FCP actually is.
- 7 Q. But of course they have to meet up in order to do that;
- 8 is that right?
- 9 A. That's how I would understand it.
- $10\,$ $\,$ Q. So they would in effect go to a rendezvous point and
- 11 then they would set -- so the operational firearms
- commander and the commanders from the other emergency
- 13 services would meet up at the rendezvous point and then
- 14 determine a forward command post?
- $15\,$ $\,$ A. That's right because what's happening is the FCP is
- going slightly forward of the RV point with the
- 17 specialist resources which obviously each individual
- 18 service has.
- 19 Q. Yes. In terms of the ground—assigned tactical firearms
- $20 \hspace{1cm} \hbox{commander, as I understood Mr Whittle's evidence and} \\$
- 21 indeed the policy, the force duty officer, one of the
- first tasks that he or she should undertake is to
- contact a cadre tactical firearms commander and deploy
- $24\,$ him or her to the scene as the ground—assigned tactical
- 25 firearms commander; is that your understanding?
 - 90

- A. That's my understanding, yes.
- Q. And then just to complete that picture, once the
- 3 ground—assigned tactical firearms commander is deployed,
- 4 then a subsequent cadre tactical firearms commander,
- $\,\,$ $\,\,$ when they become available, should be appointed and take
- 6 over that role from the force duty officer; yes?
- 7 A. That's certainly how it's described in the document from
- 8 Dave Whittle. I think, however, there's been lots of
- 9 discussions with regard to this and where the second
- 10 FDO -- not FDO, the second TFC would sit. It could well
- 11 be that in this occasion they could go to the CTPOR,
- 12 which would be slowly opening, but it is a discussion
- 13 for the commanders.
- 14 SIR JOHN SAUNDERS: Sorry, could go to where?
- 15 A. The Counter-terrorist Police Operation Room, CTPOR.
- 16 I do apologise.
- 17 SIR JOHN SAUNDERS: It's perfectly all right.
- 18 MR WEATHERBY: This is a matter I can take up with other
- 19 witnesses in due course, but in essence the force duty
- 20 officer becomes the initial tactical firearms commander,
- 21 deploys the next available cadre tactical firearms
- 22 commander to the scene and then the following next
- 23 available cadre tactical firearms commander becomes or
- takes over from the FDO, whether that's at the
- 25 Counter-terrorism Police Operations Room, whether it's

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- 1 at the force command module or somewhere else?
- 2 A. Well, what I would suggest is that when the first
- 3 ground—assigned arrives on scene, and they're in
- 4 a position to assume control, then it would be
- 5 a discussion from the initial TFC to the ground—assigned
- 6 TFC with regards to command and control.
- $7\,$ $\,$ Q. Okay. Well, the policy appears to say that there should
- 8 be an overall TFC elsewhere; is that not right?
- 9 A. Yes, there should be.
- 10 Q. All right. Finally on this point, and moving swiftly
- on, in terms of the ground—assigned tactical firearms
- commander, their role is set out, we don't need to look
- 12 commander, their role is set out, we don't need to loc
- at it at the moment, but just for the record it's set
- out at paragraph 4.4 of the Whittle document,
- 15 Mr Whittle's document. Their role is to develop command
- 16 situational awareness, the overall ability to resolve
- $17 \hspace{1.5cm} \text{the incident, and meet the requirements of the} \\$
- 18 multi-agency approach to Plato incidents; is that a fair
- 19 summary?
- 20 A. It sounds like it, yes.
- 21 Q. Can you help us with this because Mr Whittle wasn't
- 22 sure. Is the ground—assigned tactical firearms
- 23 commander the tactical commander of the whole Greater
- Manchester Police turnout, ie firearms officers and
- 25 non-firearms officers, or is the ground assigned

- 1 tactical firearms commander in charge commanding the 2 firearms police only?
- 3 A. The way I would understand it, I would see this as 4 a firearms deployment. If we take it out of this environment, it's a firearms deployment and our sort of 5 like APP I think covers this. I think what it says 6 7 is that the TFC needs to speak to the SFC, obviously to get the authority -- not rescinded, what's the other 8 9 word -- to have it authorised, the deployment of armed 10 police. It's for the SFC to ensure that the incident is 11 fully resourced, for want of a better word. If the 12 ground TFC can deal with everything there, then they are

in charge. If they need additional support, such as

via the SFC whose responsibility it is to then send

they need a Silver commander, then they would request it

Now, it's a command protocol between those two people, what they actually need, so it could well be the TFC says, "I'm going this way, I'll deal with everything over there, the armed assets, you deal with all the unarmed staff that are coming". That could be one, but it would be an agreement at the scene between those two people. (Overspeaking). I was going to say, I wouldn't see a -- "Okay, we're being deployed, so we

automatically need a Silver". I would think it would be 93

- 1 the ground-assigned if they are of the opinion that they 2 need more resources, then it should be provided by Gold.
- 3 Q. So there is some wriggle room, if I can put it that way, 4 in terms of how the policy is to be applied?
- 5 A. That's my interpretation of it, sir.
- Q. Right. So first and foremost, the ground-assigned 6 7 tactical firearms commander, as it says on the tin, is 8 a firearms commander, so he or she is despatched to the 9 scene to be tactical commander of the armed assets, but 10 that would include the multi-agency command because the 11 hot, warm and cold aspects, of course, are related to 12 both the firearms and the other responders as an 13 interface between --
- A. That's correct. 14
- 15 Q. But --

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somebody

- 16 A. I'm sorry.
- Q. Yes, so that first and foremost is the ground-assigned 17 18 tactical firearms commander's role. But if the incident 19 is relatively limited, then there may be a discussion 2.0 between the ground—assigned TFC and the strategic 21 firearms commander --
- 2.2 A. Yes.
- 23 Q. -- about also taking command of the unarmed assets?
- 24 A. I would say that they would have automatically control
- 25 because some of the first actions that we have is

- identifying an unarmed Bronze, giving them a Stay Safe
- 2 brief, because obviously -- certainly if we look at this
- 3 document, the first responders are unlikely $\,--\,$ the first
- 4 police responders, anyway, are unlikely to be armed and
- they are our eyes and ears. So it would be definitely 5 the TFC's responsibility to take control of those 6
- 7 officers, I would suggest.
- Q. Right, okay. Would you agree with me that the policy in 8 9 fact isn't very clear about this?
- 10 A. This is all covered, I would suggest, at normal firearms
- 11 deployments. It's what happens at every firearms
- 12 deployment. The tasking of Stav Safe, unarmed staff.
- 13 But I'll concede it doesn't say, "And the TFC has
- 14 control of unarmed staff"
- 15 Q. Well, the policy does refer to the FDO's responsibility
- 16 to appoint a Bronze unarmed commander, ie an operational 17
 - commander for unarmed officers.
- 18 A Yes
- Q. You tell me otherwise, but it doesn't appear to be clear 19
- 20 whether there should be an unarmed Silver at the scene
- 2.1 as well as a ground (overspeaking).
- 22 A. That's not how I would see it. I would see it as the
- 2.3 TFC is the commander at the ground and if he needs
- 2.4 additional support from a ground-assigned Silver, then
- 25 he can request it and it would be provided.

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- 1 Q. So the presumption is that, so far as you're concerned,
- 2 the presumption under this policy is that the
- 3 ground-assigned tactical firearms commander is the
- Silver covering all of Greater Manchester Police's
- 5 assets?
- 6 A. That's my understanding.
- 7 Q. Just finally on this point, and I don't think we need to
- 8 put it up, but we can do if necessary. Appendix B to
- 9 the Greater Manchester Police major incident plan makes
- 10 reference to a tactical Silver commander at
- 11 a non-specific major incident. You would be aware of
- 12 that, yes?
- 13 A. I must -- I'll be honest with you, sir, I am aware of
- 14 the policy, it was given to me on Tuesday. I'm not
- 15 familiar with what you're referencing.
- 16 Q. Right. I can deal with it in a different way then and
- 17 I won't pursue that with you if you're not familiar.
- 18 A. No, sir, it's not a working document of mine.
- 19 Q. The final topic I will deal with very briefly indeed is
- 2.0 the commander training in early 2017. We've asked
- 21 Mr Whittle a lot of questions about this, so I won't 2.2 duplicate those questions. But this was commander
- 23 training which was set up between the three services.
- 2.4 Mr Gaskell from GMFRS, NWAS and Mr Whittle, and took
- 25 place on three occasions in January and February 2017,

- 1 and we've seen the PowerPoint training yesterday. Yes?
- 2 A. Yes, sir
- 3 Q. In fact, you attended -- I think you didn't have 4 anything to do with the setting-up of that training, did
- 5
- A. No, sir, I came as support to the actual event. 6
- 7 Q. Yes. So you attended, I think on 4 January 2017, so the 8 first of those days; yes?
- 9 A. I attended two of the three, I believe, \sin .
- 10 Q. Okay. Can I just put a document up, which is very simple, I'm sure you've seen it. $\{INQ019054/1\}$. 11
- 12 I think you have seen this. This is a document that 13 appears to have come out of that training.
- 14 A. That's correct.
- 15 Q. Which are action points and I just want to ask you about
- 16 the two that your name appears by. First of all, 17
- 18 "Development of hard-wired system between all three 19
- 20 A. Yes.
- 21 Q. Am I right to read that out of this training day an
- 2.2 action point that you and Mr Gaskell took ownership of
- 2.3 was to develop a dedicated system between the three 2.4 command centres to ensure during a Plato incident the
- 25 FDO had a ready means of tri-service communication?
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- Is that right? 1
- 2 A. The way I understand that, sir, is the development of 3 the channel.
- Q. Right. Does that differ from what I've just said?
- 5 A. I believe -- no, sir, I think it's the piece of work which Ms Hoyte was --6
- 7 MR GREANEY: Can I just interrupt for one moment? I'm
- 8 sorry, Mr Weatherby. As I indicated yesterday, we
- 9 should not be referring expressly to particular 10
- 11 MR WEATHERBY: Indeed.

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- 12 Whatever channel, this is talking about the 13 development of a dedicated means of tri-service
 - communication between the three command centres?
- 15 A. That's right and I believe that was the work which was 16 undertaken and I believe that -- was it Mr Whittle's 17 version 2.1? — reflects that being —
- 18 Q. I see, and that was reflected in the July 2017 version, 19 the version that was after the attack?
- 2.0 A. I believe so, sir, yes. I believe so.
- 2.1 Q. Okav. Point number 5:
- 2.2 'Consider a GM-wide MTFA response plan (similar to generic response plan). GMP already have some iconic 23
- 2.4 points identified. To liaise with GMFRS and NWAS."
- 25 A. I don't think so. I certainly can't remember doing any

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- further work with regard to that, sir.
- 2 Q. Would this be right: that those two points first of all
- 3 arose out of feedback from Winchester Accord about the
- 4 lack of communication from Greater Manchester Police to
- 5 the other two control centres?
- A. I can't recall, sir. I can't recall. 6
 - Q. The fifth point referring to something similar to the
- generic response plan was trying to take forward 8
- 9 interoperability and meshing the joint response to
- 10 a Plato situation in another way?
- 11 A. Sir, I honestly can't remember. I can't remember.
- 12 Q. Okav. Finally, the last question. In terms of the two
- 13 dates that you were there, are you aware of attendance
- 14 lists? Is there some attendance list where we can see
- 15 who attended at those training events from Greater
- 16 Manchester Police?
- 17 A. I think unless the Fire Brigade have some, we don't have
- 18 any attendance lists, sir.
- 19 Q. Why would that be?
- 20 MR GREANEY: Can I just help? Sorry, Mr Weatherby, I'm
- 21 interrupting with a view to helping. I have very
- 22 recently, by which I mean the last 5 minutes, seen the
- 23 product of a piece of work which has been designed to
- 2.4 identify those who did attend the training in early
- 25 2017. So I expect that before the end of the day, or
- 1 certainly tomorrow, we will be able to provide you with
- 2 that information.
- 3 MR WEATHERBY: That's very helpful, Mr Greaney.
- Thank you very much, Mr Lear, those are my 5
- 6 SIR JOHN SAUNDERS: I want to follow up slightly on the
- 7 training and this is something Mr Whittle said which
- 8 I didn't quite understand. Mr Whittle regarded the
- 9 commander training as being quite urgent --
- 10 A. Yes. sir.
- 11 SIR JOHN SAUNDERS: -- because of problems which had come
- 12 out of Winchester Accord of which you were not aware but
- 13 the training was urgent. And there was talk about
- 14 whether as many police commanders attended as might have
- 15 been hoped for.
- 16 A. Mm-hm.

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- SIR JOHN SAUNDERS: And he was saying the difficulty is that 17
 - the training times are set for the whole year when
- 19 people can do training.
- 2.0 A. I think what Mr Whittle was trying to articulate
- 21 yesterday is similar to the email which I sent out.
- 2.2 Each year commanders, firearms commanders, have to
- 23 attend two periods of training as a minimum set by the
- 2.4 force $\,--\,$ by the chief firearms instructor. One is
- 25 a 6-hour module, which the email sets out, and one would

1 have been a 3-hour tactical module at another point FRS and ambulance counterparts is responsible for 2 2 identifying a suitable FCP for specialist emergency during the year 3 What Mr Whittle is saying is that is set in April, 3 service personnel." 4 at the beginning of each financial year, by the chief 4 Which I think in large measure was the answer you 5 firearms instructor and that's the training for the 5 gave. commanders that year. So he was saying we couldn't do A. Thank you, sir. 6 6 7 additional training because it had not been set. 7 Q. But one other matter in relation to a question you were SIR JOHN SAUNDERS: So if a particular commander has done 8 8 recently asked. You were referred to an email from 9 his $6-hour\ training\ and\ his\ 3-hour\ training\ before\ the$ 9 Jo Hoyte to Stephen Henderson, dated 29 March 2017. 10 10 January took place, within that financial year, he This is a reference to whether or not there was an old 11 wouldn't be permitted to do any more? 11 version of a firearms policy. This is something you A. I think he would have been able to attend CPD, which is 12 12 deal with in your statement and I'm just wondering 13 basically a -- I think we could have done it. I think 13 whether you can assist us. 14 14 we could have brought that in. In the email from Jo Hoyte she says: 15 SIR JOHN SAUNDERS: Everyone recognises it's urgent, we need 15 "I notice that the copy on the ops planning database...' 16 16 to resolve it --17 A. Yes 17 And when you deal with this in your second witness 18 SIR JOHN SAUNDERS: -- because we have a severe threat. It 18 statement, you refer to the intranet in which there 19 just seems -- would it not be possible to say, "Never 19 would be firearms folders. My first question, just so 20 mind those, you're all going on it"? 2.0 that we are clear about this: the ops planning database 2.1 A. I think it would have been possible, sir, with 21 that Jo Hoyte referred to in the email and the intranet 22 2.2 a strongly worded email from one of the more senior firearms folders that you refer to in your witness 2.3 23 officers than me. statement, the same database or two separate databases? 2.4 SIR JOHN SAUNDERS: Thank you. 2.4 Two completely separate databases, sir. I'm responsible 25 The other thing I asked Mr Whittle to do, and he was 2.5 for the firearms one and I believe the other database 101 103 1 going away to do, was he had been asked a lot about the 1 was in the ops planning team, I believe. 2 implementation of version 2. I asked him to go away and 2. Q. I hope this is perhaps the most obvious question that 3 say, actually, would it have made any difference to the 3 has been asked so far, but the best place to search for response on 22 May knowing, as we now do, or having some 4 a firearms document would presumably be the firearms 5 idea of things which may have gone wrong on the night. 5 6 Again, if you want to go away and look at it and compare 6 A. I would also tend to take it one step further, sir, 7 7 the versions and then decide whether there was anything insofar as if somebody was asking for a firearms policy 8 which might have made a difference, by all means. But 8 they could ask the Firearms Policy Unit. 9 9 Q. Right. You said at a much earlier stage in your off the top of your head? 10 A. Sir, can I be perfectly honest with you? When I left 10 evidence that there would be an onus, and I am sorry, 11 the firearms environment I tried to stay away. I don't 11 I should have introduced the question a little more 12 actually know what happened on the night. 12 clearly. This is the 12 May email, Mr Lear, to which SIR JOHN SAUNDERS: That's fair enough. Thank you. 13 13 the three principal Plato documents were attached, 14 MR GREANEY: I have been in touch with Mr Horwell who does 14 including in particular Mr Whittle's 4 May document. 15 not think his questions will last any longer than 15 When asked about that email, much earlier this 16 10 minutes. It's rather better that we conclude them 16 morning, you said that there would be an onus on the 17 17 before lunch and I've been told that's fine. individual to read the policies and would later be 18 Questions from MR HORWELL 18 tested on them in training. 19 MR HORWELL: Mr Lear, just in relation to some questions 19 A. That's right, yes. 2.0 2.0 Q. The 4 May document, the Whittle document, that had in you've recently been asked, you were asked whose 21 2.1 responsibility was it or would it have been to set up it, in colour, the changes to the predecessor? 2.2 the FCP. I'm not going to ask for it to be put on the 2.2 It did, sir, yes. 2.3 23 So anyone looking at that document could clearly see screen, it will take a little time, but 4.8 of JOPs 3

25 A. That's right, yes.

what changes had been made.

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states that:

"The police on-scene commander in consultation with

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1 Q. Those documents, the Whittle document in particular, 2 were sent to firearms commanders, and the question that 3 I have for you is: would you expect firearms commanders, 4 that level of police officer, to understand and 5 appreciate the changes that had been made? A. I would, sir, but also if there was any confusion, 6 7 I would have expected them to come back and say, "Simon, 8 what are you on about? Is this a draft version or is it 9 not? What's it about?" 10 SIR JOHN SAUNDERS: That's the problem, if you don't mind me 11 saying so, with the basis of the question. Actually, 12 what you sent out in error was a draft document. If 13 you'd been sending out a completed document, they would 14 all be in the same colour. 15 A. I fully agree, sir. As I said, I can't explain it. SIR JOHN SAUNDERS: It had the benefit of showing the 16 17 changes but it also was capable of misleading people 18 into thinking it was a draft. 19 A. I fully agree. 20 SIR JOHN SAUNDERS: That's not a criticism. 2.1 Sorry. Mr Horwell. MR HORWELL: Not at all, sir. The document -- perhaps you 22 2.3 can't answer this, Mr Lear, and I'm sure you understand,

> the 4 May guidance that would have been placed on the 105

> no one is asking you to guess, but the Whittle guidance.

- intranet in the firearms folders, would that have been 1 2 listed as a draft or not?
- 3 A. No, there was definitely a fully de-coloured document 4 and I have just picked the wrong one up.
- 5 Q. So in other words, without the word "draft" written on 6 each page?
- 7 A. Yes, sir, and the colour removed as well.
- 8 Q. Can I then get back to the question I asked a few moments ago. Firearms commanders, would you have 10 expected them to have understood the changes?
- 11 A. I would have, sir, due to the fact that it's in the 12 firearms environment. I think as well that a lot of the 13 changes that were there were the same actions but 14 explained, so like some of the feedback, if that's the 15 word, that we had from the HMIC was about how they're 16 just bullet points. So they were the same actions but 17 with an explanation behind them.
- 18 Q. You were asked about the fact that SOP 47 version 5, had 19 in it a sentence or two about delegation by the FDO and 2.0 support from the control room for the FDO. The 21 principle of an FDO delegating tasks, that would be 2.2 commonly understood?
- 23 A. I can't see how they could do it without delegating and 2.4 I think that would be an accepted practice. That's what 25

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I think.

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SIR JOHN SAUNDERS: You've understood the distinction which

2 has been made between delegating what's happening and

3 having the delegation organised beforehand?

4 A. I do understand what you're saying, sir, yes.

MR HORWELL: You've been asked a number of questions about 5

resourcing of your department and the under-resourcing 6 7 of your department. We will hear evidence in due course

8 that the GMP budget from 2010/2011 to 2017/2018 was

9 reduced in the Government-directed period of austerity

10 by £74 million. That was the reduction within those

7 years. That had a marked impact on GMP's staffing

12 levels throughout the force: is that right?

13 A. That's correct, yes.

14 Q. And the suggestion that you have been asked about, that 15 might GMP have worked on the basis that a terrorist

16 attack would not happen in Manchester, would you agree 17 that nothing could be further from the truth. Mr Lear?

18 A. I agree, sir. Like I say, our unit, that being the

19 firearms unit, we were training tirelessly for it,

2.0 tirelessly. And the investment also nationally with

21 regard to the specialist units that we have access to as

22 well

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2.3 SIR JOHN SAUNDERS: Mr Horwell, since that came from me, can

2.4 I make it clear it was not a suggestion, it was actually

2.5 a question.

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MR HORWELL: Sir, I didn't intend it otherwise, I promise 1 2 you. I think others have suggested it. You asked the 3 question. I certainly didn't intend to suggest otherwise. sir.

Mr Lear, the training that took part in January and February of 2017. You dealt with this in your witness statement. It's clear that we are soon going to have some figures. But in terms of your recollection at the time you made your second witness statement, you said this, and I can take you to the passage, but it's a short one, so I'll read it. If you want to look at your witness statement, you will of course say so. This is paragraph 70 of your second witness statement:

"My recollection is that there was a reasonable number of attendees from GMP at these sessions at Thompson Street, sufficient to ensure that we had a representative in each group for the discussion sessions, but I cannot remember who was there and did not make a list of attendees."

You go on in your witness statement at paragraphs 71 and 72 to deal with further training in April of that same year. I won't read the paragraph, it is there for

There has been some evidence of, on occasions, failures by GMP police officers to attend training

1	sessions. Can you help the inquiry, please, as to the	1	Ambulance, then they don't know what $$ as I think you
2	problems some police officers have with attending	2	explained yesterday $$ the line of exploitation is .
3	training sessions and the difference between their roles	3	They don't know how far they can go and where it's safe
4	as firearms commanders, for example, and their normal	4	to go to. Obviously there could well be a reasonable
5	day jobs, Mr Lear? Can you help us, please?	5	reason, if that's the right phraseology, of why the
6	A. Well, I'll try a little bit, sir. The GMP firearms	6	three parties can't physically come together but they
7	commanders, that's not just their $full$ —time job, they	7	need to have the discussion.
8	actually do that as well as their normal role, so if	8	The important thing is the discussion about what the
9	they were divisional commanders, for example. Also	9	latest intelligence is, what's the threat, what are the
L 0	because of who they are, they're quite senior in the	10	different zones, how are we going to do it, are we going
L1	organisation, so it's not, shall we say, beyond the	11	to extract, et cetera, et cetera.
L2	realms of possibility for these people who are offered	12	SIR JOHN SAUNDERS: So if you can't meet for whatever
L3	the training physically not to have the time to go, just	13	reason $$ and here we know the Fire Service didn't want
L4	basically because of day-to-day business.	14	to go to the Cathedral Car Park, they thought it was too
L5	Obviously in comparison to the mandatory training	15	close, so they went elsewhere. So if you can't meet, it
L6	which we spoke to, the 6 hours and the 3 hours, there's	16	makes the communication even more important. You have
L7	no wriggle room for that one and they have to attend	17	to have it otherwise the whole thing breaks down.
L8	that one, otherwise they lose their status as a firearms	18	A. We might as well not bother turning up.
L9	commander.	19	SIR JOHN SAUNDERS: Okay, thank you.
20	MR HORWELL: Thank you, Mr Lear.	20	Mr Horwell, did you want to pursue that at all?
21	Sir, that is all I ask.	21	MR HORWELL: No, thank you, sir.
22	SIR JOHN SAUNDERS: Mr Horwell, would you stay on the line	22	MR GREANEY: Sir, I have no questions, so that concludes the
23	for a moment? I'm going to ask something and if	23	evidence of Inspector Lear.
24	I manage to confuse everybody, perhaps you can sort it	24	SIR JOHN SAUNDERS: I'm very grateful. It has been a long
25	out.	25	session for you, I know, but we're very grateful for
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1	I am sorry about this. This is just the last thing.	1	your help.
2	You were explaining to us the procedure of how it is	2	A. Thank you.
3	meant to work about going to the forward command post.	3	MR GREANEY: Sir, 2.15?
4	A. Yes, sir.	4	SIR JOHN SAUNDERS: Why not?
5	SIR JOHN SAUNDERS: And what you said is everyone is	5	MR GREANEY: Thank you.
6	directed to the rendezvous point and at the rendezvous	6	(1.18 pm)
7	point the three commanders of the three different	7	(The lunch adjournment)
8	services will get together.	8	(2.18 pm)
9	A. Mm-hm.	9	MS CARTWRIGHT: Good afternoon, sir. The gentleman in the
LO	SIR JOHN SAUNDERS: And will then agree a forward command	10	witness box is Mr Henderson and I'll ask for him to be
L1	post. Once there, they are then there to make joint	11	sworn in a moment.
L2	decisions about what happens. It's the basis of joint	12	Just to clarify at the outset, Mr Henderson has
L3	working?	13	provided two witness statements but recently the inquiry
L4	•	14	has made a Rule 9 request to address specific areas, so
L 5	SIR JOHN SAUNDERS: What is meant to happen when they don't	15	the focus of this witness's evidence today will be in
L6	actually come to the rendezvous point together? Does it	16	respect of what he can tell us about Operation Plato,
L7	all break down? I think we're going to hear that	17	touching upon some training issues, and then Resilience
L 8	actually there never was an occasion on 22 May when they	18	Direct. The other matters will await the outcome of the
L9	all came to the same rendezvous point. So how do we get	19	witness statement that's due from this witness in due
20	past that initial block?	20	course.
21	A. It's very difficult, isn't it, sir? Because the three	21	Having set that out, could I ask, please, for
2.7	agencies need to discuss what the threat harm and risk	22	Mr Henderson to be sworn

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are. Obviously, the firearms officers are already

for example, don't know what the risk is, or the

deployed to that and that's one thing. But if the Fire,

INSPECTOR STEPHEN HENDERSON (sworn)

Questions from MS CARTWRIGHT $25\,$ MS CARTWRIGHT: Good afternoon. Could you tell the court February 23, 2021 Manchester Arena Inquiry Day 66

- 1 your full name, please?
- 2 A. My full name is Stephen Boyd Henderson.
- 3 Q. You should have a bundle in front of you and contained 4 within there we should find two witness statements you
- provided. Can Lask you first of all to turn behind 5
- $tab\ 1$ where we should see there your statement dated 6
- 4 July of last year?
- 8 A. Yes, that's correct.
- 9 Q. Are the contents of that statement true to the best of 10 your knowledge and belief?
- 11
- 12 Q. More recently you provided a supplementary witness
- 13 statement to the inquiry. That statement should be behind tab 2 and is dated 18 February of this year.
- 14
- 15 A. Yes, that's correct.
- Q. Are the contents of that statement true to the best of 16 17 your knowledge and belief?
- 18 A. Yes, it is.
- 19 Q. Thank you.
- 20 Mr Henderson, could we start first of all by you
- 2.1 assisting us in terms of your employment with Greater 22
- Manchester Police? Can you give us an overview about when you first joined GMP and the various roles that 2.3
- 2.4 you have had in GMP, please?
- 25 A. I joined Greater Manchester Police back in May 1993,

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- 1 where I became an operational officer. Then after that,
- 2 I was specialised and I spent 6 years in the mounted
- 3 unit before, in 2008, going into what was the Resilience
- Development Unit. That came later on the Civil
- 5 Contingencies Unit.
- 6 Q. Can I ask, because you refer to it in your witness
- 7 statement, you give the cipher CCRU, but refer to it as
- 8 the Contingencies Development Unit; should that be the
- 9 Civil Contingencies Resilience Unit?
- 10 A. No, it was later (inaudible: distorted) resilience unit,
- 11

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- 12 Q. Thank you. You tell us in the witness statement that
- 13 that role was part of the specialist operations branch,
 - dealing with civil contingencies and emergency planning.
- 15 A. Yes. that's correct.
- 16 Q. Could you assist us them, more by way of an overview, of
- 17 what fell within the specialist operations branch,
- 18 please, and how your team in the Civil Contingencies and
- 19 Development Unit fitted within that, please?
- 2.0 A. Okay. There was a range of units within specialist
- 21 operations. They range from firearms, dogs, mounted to
- 2.2 planning. Part of that planning unit sat with
- 2.3 ourselves, which was the Civil Contingencies Resilience
- 2.4 Unit
- 2.5 Q. Thank you. So in terms of emergency planning that would

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- fit within your part of the team?
- 2 A. Yes, it did. It fell within part of planning and --
- 3 sorry, planning and testing and exercising. It was
- 4 approximately a small unit of four staff -- four
- 5 full -time staff and one part-time.
- Q. Thank you. In mentioning the other staff, I think we're 6
 - going to come to -- was your line manager someone by the
- 8 name of Parker?

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- 9 A. He was. Lee Parker was my inspector in 2017. He also
- 10 had responsibility over the planning unit, parts of the
- 11 planning unit as well. Prior to that, 2016, it
- 12 was June Roby, Inspector June Roby,
- 13 Thank you. You mentioned in looking at the overview of
- 14 what falls within the specialist operations branch that
- 15 firearms would fall under that portfolio as well.
- 16 A That's correct
- 17 Q. We have heard some little evidence about the firearms
- 18 unit in the evidence that's been given today and
- 19 vesterday. But in terms of the -- who was the officer
- 20 that effectively had responsibility for the firearms
- 2.1 unit? We have heard reference to Leor Giladi.
- 22 A. Yes, Mr Giladi was superintendent over the firearms and
- 2.3 ourselves over at planning.
- 2.4 So he would be responsible for firearms but also would
- 25 sit over your aspect of the team as well?

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- 1 A Yes
- 2 Q. Thank you. Can we just be clear then, at the relevant
- 3 time, so March to May 2017, who were the other staff
- that sat within your team? Because we've heard lots of
- 5 reference to different names. Was Laura Lewis within
- 6 that team?
- 7 A. Laura Lewis was equivalent rank to myself. She was
- a police support staff and she was actually part of the 8
- 9 Civil Contingencies Unit as well. However, she
- 10 concentrated in the force command module and Airwaves
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- 12 Q. There's also Rachel Allen?
- 13 A. One of the officers who I worked with.
- 14 Q. And then we're going to come on later in your evidence
- 15 to deal with Jo Hoyte. I think that individual didn't
- 16 sit within your team. Are they part of the North-west
- 17 Counter-terrorism Unit?
- 18 A. Yes, Counter-terrorism Policing North-west.
- 19 Q. Who were the other staff, if we look out for names and
 - hear their names, to know that they fall within your
- 21 emergency planning or civil contingencies?
- 2.2 Katrina Hughes. At that stage it was -- I think it was
- 23 Royle at that stage. And also Sarah Grimshaw
- 24 Thank you. So Mr Parker being your line manager but
- 2.5 Mr Giladi having responsibility for the portfolio?

- A. Yes. And there was a part-time as well, Hannah Vaughan.
- Q. Thank you. You tell us that your role at the time 2
- 3 within the Contingencies and Resilience Unit was
- 4 sergeant of the unit and was to assist in planning the
- 5 appropriate police response to major and significant
- events. 6
- 7 A. Yes. that's correct.
- Q. And also you tell us it was also to support GMP with its 8
- 9 obligations under the Civil Contingencies Act of 2004. 10 A. Yes.
- 11 $\ensuremath{\mathsf{Q}}.$ And this was done by working with other category 1
- 12 responders and appropriate partner agencies in planning
- 13 to mitigate the effects of an emergency?
- 14 A. Yes, that's correct.
- 15 Q. You also tell us there were additional responsibilities
- 16 placed on the force around civil contingencies and
- 17 emergency response, including the strategic policing
- 18 requirement --
- A. Yes. 19
- 20 Q. $\,\,--\,$ the Joint Emergency Service Interoperability
- 2.1 Programme and the Government's CONTEST strategy.
- 2.2 A. Yes, that's correct.
- 2.3 Q. You go on to tell us that on joining the branch or the
- 2.4 unit you attended a number of specialist training
- 25 courses at the Emergency Planning College in relation to

- 1 vour role.
- 2 A. Yes, that's correct.
- 3 Q. And then you give us a number of lists of training
- exercises you attended upon: introduction to civil
- 5 protection; writing emergency plans; risk management;
- 6 validating emergency plans.
- 7 A. That's correct.
- 8 Q. And can I ask you, because in terms of the courses that
- 9 the Emergency Planning College deals with, they also
- 10 give train ing in respect of Resilience Direct.
- 11 A. I'm not aware of it, but I wasn't -- I didn't take part 12 in that training.
- 13 Q. So you've had no training in respect of Resilience
- 14 Direct?
- 15 A No
- 16 Q. Thank you. You also tell us that since you completed
- 17 those courses with the Emergency Planning College that
- 18 you have continued your professional development by
- 19 attending various seminars, training inputs and learning
- 2.0 events that were relevant to your role.
- 2.1 A. That's correct.
- 2.2 Q. And you have used that knowledge and experience to
- 23 contribute to the development of the College of Policing
- 2.4 approved professional practice for civil emergencies?
- 25 A. Yes, that's correct.

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- 1 Q. Can you explain a little more what that actually means 2
 - in terms of as a qualification or training?
- 3 A. So what happens, after you've done a number of courses
- 4 at Easingwold, it's how do you improve your competencies
- 5 in relation to making sure that you're able to deliver
- plans, you're able to deliver the quality that you would 6
- 7 be required and that by attending various seminars,
- 8 training, and of course in relation to this professional
- 9 practice, assisting that in relation to civil
- 10 emergencies and writing that for the College of
- 11 Policing.
- 12 Q. When would that have been that you did that?
- 13 A. I believe that may have been around 2015. I'd have to
- 14 go and check, but I believe it may have been around that 15
- 16 Q. Thank you. Before we get into the detail of matters,
- 17 can you help us in terms of the planning databases to
- 18 which you would be having access, because we have heard
- 19 lots of evidence yesterday and today about policies and
- 2.0 iterations of policies and where they would be. You
- 21 tell us in your second witness statement that you had
- 22 responsibilities in relation to the operational planning
- 23 database used by GMP for 300 plans of various kinds?
- 2.4 Yes. that's correct.
- 25 Q. So can you just assist us a little bit more to

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- 1 understand where the policies would be but particularly
- 2 by reference to the intranet and we have also heard
- 3 evidence today about firearms policies and a separate
- section for firearms policies?
- 5 A. That would be set on a separate, probably secure, site
- so that would sit under firearms policy. There would be 6
- 7 limited people who would have had access to that site
- 8 where on the operational planning database, all officers
- 9 would have had access to the operational planning
- 10 database across GMP. So if they required to look at
- 11 a plan or if there was an emergency or whatever, they
- 12 would be able to access that site and find that plan.
- 13 Q. So general plans would sit in the operational planning
- 14 database that you had responsibility for?
- 15 A Yes
- 16 Q. And would they then include the plans in respect of
- 17 emergency preparedness planning?
- 18 A. Yes, that's correct.
- 19 Q. Then in terms of separate firearms policies, would there
- 2.0 be occasions when they would sit on the emergency
- 21 operational planning database?
- 2.2 A. I think it was limited, I'd have to go and check, but
- 23 I think there may have only been one plan that I'm aware
- 2.4 of that sit in relation to firearms on --
- 25 Q. We'll come on to deal with that plan in a moment. But

- 1 was there a policy or a procedure or protocol that
- 2 governed knowledge of where different policies and
- 3 procedures sat?
- 4 A. In relation to?
- Q. Particularly in relation to marauding terrorist firearmsattacks.
- 7 A. That would have been sat very much with what --
- 8 I believe it would be with firearms themselves
- 9 in relation to governance —
- 10 Q. But in terms of where it has a role in respect of
- $11 \hspace{1.5cm} \text{interoperability} \hspace{0.2cm} \text{and emergency response, how would those} \\$
- on the other side have knowledge about what was sitting on the firearms side? How would that work?
- 14 A. It was possibly part of JESIP. There would have been
- nice little inter-liaison officers that may have had
- some access in relation to it. if there had been some
- training in relation to firearms plans, et cetera.
- 18 Q. Perhaps we'll look at that a little more when we come to19 deal with the Operation Plato plan.
- 20 In terms of then —— if we then move to look at that
- 21 now, please, because part of your second witness
- statement was to assist the inquiry with clarification
 about what was the operational the relevant GMI
- about what was the operational the relevant GMP Operation Plato plan that was in place in May 2017.
- 25 A. Yes.

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- Q. Perhaps if I can start by taking you to your second
- witness statement, please, looking at paragraph 9. You
- 3 tell us you were not responsible for the development of
- $4\,$ plans, protocols or procedures including SOPs, standing
- 5 operating procedures, for Operation Plato.
- 6 A. Yes, that's correct.
- 7 Q. And that applied in respect of the local force level
- 8 within GMP.
- 9 A. Yes, it did.
- 10 Q. But also the regional level and national level?
- 11 A. That's correct.
- 12 Q. And you tell us what you have already clarified, that
- your responsibility was the operational planning
- 14 database?
- 15 A. Yes, that's correct.
- 16 Q. And I think you tell us that there was over 300 plans of
- various kinds that would be located within that
- 18 database?
- 19 A. That's correct.
- $20\,$ $\,$ Q. When you refer to the operational planning database, is
- 21 the intranet something different?
- 22 A. In relation to?
- $23\,$ $\,$ Q. The planning database for storing the relevant plans and

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- 24 risk assessments.
- 25 A. The intranet -- I would assume this is in relation to

- 1 the firearms. Firearms' intranet would be a GMP system
 - and again that would be a folder within GMP systems that
- 3 could be occurred and locked down that would have
- 4 limited access to -- for people.
- 5 Q. Just dealing then with the firearms policy aspect, would
- 6 you in the role that you had be one of those individuals
- 7 that had access to those folders within the firearms
- 8 unit?
- 9 A. Not normally, no.
- 10 Q. You say not normally.
- 11 A. I'm not aware that I had access to it, no.
- $12\,$ Q. Would there be ever an occasion when you would seek
- 13 permission to have access or be given access?
- 14 A. No, not that I would be aware of.
- $15\,$ Q. What would the process or procedure be then if someone
- 16 needed clarification around, as we will see in a moment
- 17 happened in March 2017 for clarification about what
- was the relevant operational policy for an
- 19 Operation Plato?
- 20 A. I would direct them to that point of contact.
- 21 Q. And that being a point of contact within the firearms
- 22 unit?
- 23 A. Yes, that's correct.
- 24 Q. Would there be anyone on your side of the team, the
- 25 Civil Contingencies Resilience Unit, other than you,

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- 1 that would have access to firearms policy?
- 2 A. Not that I'm aware of.
- 3 Q. Mr Parker would not have access?
- 4 A. Not that I am aware of, no.
- 5 Q. In terms of Mr Giladi who sat above you both, he would
- 6 have access to the policies , would he?
- $7\,$ $\,$ A. He may well have given his -- he was firearms, so
- 8 I would assume so, yes.
- 9 Q. And I think we've seen earlier today that there was
- a version I think that he himself authored.
- 11 A. Yes
- 12 Q. Was there any discussion ever at any point prior to the
- arena attack as to the need or that there should be
- 14 someone within your team that had an ability or
- permission to access a separate folder within GMP that
- 16 contained firearms policies?
- 17 A. No, I wouldn't see any need.
- 18 Q. Why do you say you wouldn't see there to be any need?
- 19 A. At this stage, this is a specialist plan, so I would say
- 20 we would not need to have or change it or have any
- 21 access to it in relation to that.
- 22 Q. Could I just maybe explore that a little further. We've
- seen, and I'm not going to take you to it, JOPs 3 and
- $24\,$ JESIP that specifically deals with Operation Plato but
- also marauding terrorist firearms attacks. Why would it

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- not be for a department that had a key role for emergency planning not to need to know what that specific policy said to understand how all the pieces of the jigsaw should work in practice?
- 5 A. We would be SC cleared, security clearance staff that
 6 are in the CCRU, so there may well be opportunities
 7 where we would have had access to that. For example, if
 8 it went to an exercise involving firearms training or
 9 firearms, then we may have had access to that plan
 10 because of our security clearance.

In relation to this particular —— I don't think there would be any need for me or the team to have gone through plan and reviewed that plan.

- Q. Can I ask you, in answering that question, as you
 referenced clearing, have you been made aware what the
 security marking was on that SOP for firearms at the
 relevant time?
- 18 A. Not at this stage I can't recall.

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- Q. It's just with answering it, you're referencing that
 it's a protected document that would require someone to
 have a level of clearance (overspeaking) is that based
 on something you were told?
- A. In relation to clearance, we would be able to see some sensitive documents in relation to it. We may have access in relation to seeing that plan, but as

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- I explained, it may be when we went to a seminar or something in relation to it, there would be no need for us to go in and to change it and to review it, if that makes sense, and my understanding is we didn't have access to that folder.
- Q. Okay. And so the learned chairman's been hearing some evidence about version control and when different versions of the SOP within the firearms unit related to Operation Plato changed and what was then the effective policy. So just to be clear, your team would have nothing to do with the monitoring or auditing of that?
- 12 A. That's correct.

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- Q. So that would squarely fit within the firearms unit?
- 14 A. Yes, that's correct.
- 15 Q. You go on to tell us that:

"[You] would not be familiar with the details of all of the plans that you are responsible for in the operational planning database, but when a new plan was approved it would be generally uploaded to the planning database having been signed and approved by the relevant person. The appropriate level of sign—off would vary depending on the type of plan it was."

- 23 A. Yes, that's correct.
- Q. So in giving that detail within your witness statement,
 you're not in any way referring to the firearms SOPs for

1 Operation Plato or MTFAs?

- A. No, not in relation to that. That's a general comment.
- 3 Q. You go on to tell us that:

4 "A request for a new document to be uploaded to the
5 planning database would normally come into a generic
6 team mailbox, attended to by a member of my team.
7 I would usually delegate the task of uploading them to
8 one of my team and would not normally see each and every
9 plan. I cannot specifically remember occasions in 2012
10 to 2017 when new plans arrived with my team."

- 11 A. That's correct.
- 12 Q. Thank you. You go on to tell us that:

"There would have been certain firearms—related documents that might have featured on the planning database but which would have been stored on the firearms section of the intranet."

- 17 A. That's correct.
- 18 SIR JOHN SAUNDERS: I think you read that out incorrectly without a not.
- MS CARTWRIGHT: I do apologise. I will just read it againjust to make it clear:

22 "There would have been certain firearms—related
23 documents that might not have featured on the planning
24 database but which would have been stored on the
25 firearms section of the intranet."

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- 1 A. That's correct.
- Q. So then can you help us with a little more detail as to
 what firearms—related documents would sit on your

4 planning database?

- $5\,$ $\,$ A. Again there's over 300 plans, so I would assume that
- 6 there may be some plan that gives the overview
- 7 in relation to Op Plato. However, again, as pointed out
- $\boldsymbol{8}$ at the start, that operation planning database had
- 9 access to all members of staff in GMP.
- Q. Thank you. The inquiry's heard some evidence about
 policy documents that came from the North—west Armed
 Policing Collaboration.
- 13 A. Yes
- Q. And I think the email we're going to look at at the
 moment is referencing one of their documents, so can you
- help us at all as to how those North-west Firearms
- Collaboration documents, so the regional documents,
- would find their way on to the planning unit database?
- A. We would normally be sent them by the firearms unit orsomebody in relation to that. If there was a change of
- 21 plan or an updated copy we would normally be sent that
- 22 through. As I said, we had access to 300 plans. We did
- have a system in place where we would review them on
- $24\,$ a three—yearly basis, if not a yearly basis, depending
- on the plan, but a lot of the times if it was an updated

1 plan, we would be hoping or expecting it to be sent 1 Q. We can then see: 2 "Please see attached." through to us. 2 3 Q. So when you reference "(inaudible: distorted) from the 3 This is an email of 28 March 2017 at 08.57: 4 firearms", is that the internal GMP firearms unit --4 "Please see attached revised Operation Plato initial 5 A. Yes 5 response contingency plan guidance, which was circulated Q. — rather than the actual north—west collaboration? to North-west Counter-terrorism Unit Protect and Prepare 6 6 7 A. That's correct. 7 last week, Thursday, 23 March 2017. My understanding is Q. Again, what would the process be of monitoring those and 8 8 that firearms leads within your unit should already be 9 reviewing those policies that came from the regional 9 aware of the revised guidance." 10 10 firearms collaboration? Then it sets out: 11 A. Again, because they're a specialist type of plans, 11 "The document clearly states forces should ensure 12 that, as part of their planning process for an 12 it would be very much what was sent to us to upload on 13 to our planning database. We may not have had an audit 13 Operation Plato incident, planners, commanders and 14 or been able to check every plan in relation to what 14 advisers are aware of this guidance and have considered 15 15 it in the context of their local force structures and went on Q. Can I ask you, was there -- sorry -plans." 16 16 17 So if we move back to {INQ016884/1}, Mr Lopez. 17 A. Sorry, to scrutinise each document or each plan that 18 went on our database. 18 We can see that you are then causing a query to 19 Q. Was there at any point any thought within your mind as 19 Simon Wright and Jo Hoyte, setting out, on 28 March at 20 to why it was that you could have the regional firearms 20 7.13 in the evening: 2.1 collaboration documents but you couldn't have the local, 21 "Hi, Simon, my understanding is that the" --SIR JOHN SAUNDERS: I think we're on -- are we on the right 22 the GMP firearms policies? 22 2.3 23 A. No. it didn't cross my mind at that time, no. 2.4 Q. So you have sought within your witness statement to 2.4 MS CARTWRIGHT: Bottom of the page, Mr Lopez: 25 assist us as to what was the most recent version 2.5 "My understanding is that before June Roby left she 129 131 reviewed Op Plato with yourself." 1 approved by Greater Manchester Police at the time of the 1 Pausing there for a moment, how did you have 2 attack of 22 May 2017. Perhaps to deal with this 2 3 evidence, if we could perhaps look at an email exchange. 3 knowledge that June Roby may have reviewed some Mr Lopez, please could you display {INQ016884/1}. Operation Plato material? 5 If you could expand the bottom of the page. 5 A. I can't recall exactly, but I was aware that -- there We can see at the bottom of that page, an email of 6 was something in the back of my mind that she'd been 6 7 7 28 March 2017, which is from you, sent to Simon Wright involved in doing something with Simon about Op Plato. 8 8 and Jo Hoyte. I think you've already identified

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12 Q. Can you assist us in terms of Simon Wright?

13 A. I believe Simon Wright to be part of the firearms 14 governance team.

Q. Thank you. I think the inquiry has seen reference to a version of the SOP 47, I think version 4, that was in fact authored by a Simon Wright, whether it's the same Simon Wright... If we can go over the page, Mr Lopez, before dealing with the detail of your email {INQ016884/2}. 2.0

Jo Hovte being within the North-west Counter-terrorism

We can see that there was, from Jo Hovte, the email that was circulating the guidance in respect of Operation Plato, so national guidance, that was issued in March 2017.

2.4 25 A. Yes, that's correct.

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Q. When you say Simon?

9 A. Simon Wright, sorry.

10 Q. Thank you. The inquiry has seen reference that there 11 was a version 3 of the Operation Plato SOP 47 that was 12 said to be authored by Inspector Roby.

13 A Yes

14 Q. Can you assist as you to whether or not you'd ever seen 15 that document?

16 A. I may have seen it, I don't recall whether it's in great 17 detail, no.

18 Q. Can I ask then why the query you were raising about 19 Operation Plato and revision of policies was being made

2.0 to Simon Wright? What was the purpose of that? 2.1 A. I would say it was probably a little bit of a nudge to 2.2 say: have you updated a plan and is there anything you

23 need from us and, if so, can you send us the plan to be

2.4 included in the operational planning database?

2.5 Q. Thank you. There was some evidence given this morning

- 1 from Mr Lear where he suggested if anyone wanted to know 2 anything about the relevant operational policies then 3 it would have been appropriate that anyone asking for 4 a firearms policy should ask the Firearms Policy Unit. 5 So that being some evidence that we heard earlier today from Mr Lear, would it be fair to say that this is who 6 7 you would be going to to find out about the firearms 8 policy?
- 9 A. Yes, because my understanding at that time was that 10 Simon Wright was in that team.
- 11 Q. Thank you. I think you end the email asking: 12 "Is that correct? And if not, is there anything 13

And then we can see that the response that was 14 15 received came from Jo Hovte.

SIR JOHN SAUNDERS: If we can go to $\{INQ016884/1\}$. 16

MS CARTWRIGHT: We can see it's Jo Hoyte that responds rather than Simon Wright, who confirms:

"Steve, I have just spoken to Simon Wright to obtain the most up-to-date version of the GMP Plato plan. It's accessible via the intranet site/force policy/firearms policy. It's actually a north-west regional plan, copy attached. I notice that the copy on the ops planning database is an old version. Just thinking that you may want to replace it with the revised version. I have had

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- 1 a quick look at the comms section and it's a bit 2 lacking. I am going to speak to Laura and suggest we 3 amend that section."
- We can see that that was an email to which 5 a David Sugden was copied in. Can you help with 6 identifying David Sugden and where he sat within, please? 7
- 8 A. Yes, Dave Sugden was Jo Hoyte's line manager in 9 North-west CT Policing, the counter-terrorism unit.
- 10 Q. Thank you. Would Mr Sugden have had a responsibility 11 for GMP Plato plans?
- 12 A. They would have a knowledge of that plan as it would 13 probably have linked in back with counter-terrorism.
- 14 Q. Thank you. We can see to that email was attached the 15 regional document, the north-west cross-boundaries SOP 16 version 1.4. Can I ask, before attending to give 17 evidence today have you had an opportunity to look at 18 that policy and refresh your memory from it?
- 19 A. I did.

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2.0 Q. So then can you perhaps help us unpick your 21 understanding of this email, please. So would your 2.2 understanding be from this email trail that Jo Hoyte had 2.3 specifically spoken to the Firearms Policy Unit to 2.4 identify the relevant Operation Plato plan that was

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25 working with GMP at that time? A. Yes. that's correct.

- Q. And in terms of Mr Wright, he would be an individual
- 3 that would have an ability to access the database that
- 4 you have told us about earlier on that was within the
- 5 firearms unit?
- A. Yes, that's correct. 6
- 7 Q. So it should have been easily available for Mr Wright to 8 identify what was the relevant policy?
- 9 A. I believe so at this time, yes
- 10 Q. Can I ask, we can see the email from Jo Hoyte references
- 11 that she was asking for the most up-to-date version of
- 12 the GMP Plato plan.
- 13 A. Yes. that's correct.
- 14 Q. Do you read any ambiguity in respect of the response
- 15 from Jo Hoyte that it was something else she'd been
- asked to find other than the GMP Operation Plato plan? 16
- 17 A. It didn't cross my mind at that stage that there was
- 18 different plans, no.
- 19 Q. So again in terms of Jo Hoyte, would she have had access
- 20 to the firearms policy documents?
- 2.1 A. Because she sent the initial email on, she's referenced
- 22 there that she spoke to Simon Wright, I would assume
- 2.3 she's had access to that document or Simon sent it to
- 2.4 her and then she sent it on to myself.
- 2.5 SIR JOHN SAUNDERS: Just so I understand, she is sending you

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- 1 version 4, yes?
- 2. A. 1.4. ves
- 3 SIR JOHN SAUNDERS: Sorry, 1.4. And saying presumably she's
- doing that to replace the old one, which is on the
- 5 planning database?
- A. That's correct. 6
- SIR JOHN SAUNDERS: Which must have been 1.3, presumably. 7
- 8 A. I can't recall what was on the planning database at that
- 9 time
- SIR JOHN SAUNDERS: In fact we know that $1.5\ was\ by\ then\ in$ 10
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- 12 MS CARTWRIGHT: Sir, I think that's version 5. There's two
- different things. You'll remember that you heard about 13
- versions 1, 2, 3, 4 and 5 of the SOP 47. 14
- 15 SIR JOHN SAUNDERS: Yes, okay. But it's certainly beyond
- 16 1.4, isn't it, the area plan at the time?
- MS CARTWRIGHT: Perhaps, sir, I will take the witness to 17
- 18 this document rather than seeking to undo the stellar
- 19 work Mr Greaney has already done in terms of
- 2.0 demystifying the various iterations of policies 21
- If we can look at the document that was provided 2.2 with that email, please. It's {INQ016885/1}.
- 23 SIR JOHN SAUNDERS: Okay, it was actually 1.10, the
- 2.4 up-to-date version at the time.
- 2.5
- MS CARTWRIGHT: I think that's the appendix C to it.

- SIR JOHN SAUNDERS: Okay, fine. MS CARTWRIGHT: That sat within --3 SIR JOHN SAUNDERS: Right. MS CARTWRIGHT: If we look at the document that we have, 4 5 where we can see that the attachment was version 1.4 of the cross-boundary armed response vehicle capability, 6 7 is that your understanding as to the document that was 8 attached to the email? 9 A. Yes, I believe so.
- 10 Q. And that's dated 25 July 2016.
- 11 We can see that on the first page it's version 1.4.
- A. Yes. 12
- 13 Q. I think within that, there is appendix C as a separate document that sits within it, but I think the relevant 14 15 one at the time was the version 1 point -- I hope I am right in that and that it wasn't 1.9. 16
- 17 But certainly in terms of what that email exchange 18 that I took you to a moment ago is, this is what firearms unit policy -- Mr Wright's indicated was the 19 20 operational policy within GMP at the time?
- 2.1 A. Yes. that's correct.
- 2.2 Q. So from -- your understanding is -- I think the 2.3 information you provided to the inquiry in your second 2.4 witness statement -- is -- that was your understanding as to the relevant policy that was in place at the

- 1 time --
- 2. A. Yes, that's correct.
- 3 Q. — in March of 2017?
- 4 A. Yes.

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- 5 Q. You go on to say in your witness statement:
 - "Although I cannot be sure which document was the most recent document approved by GMP at the time of the attack on 22 May 2017, I believe that the most recent version available on the planning database at the time of the attack on 22 May 2017 is likely to have been a plan referred to as the regional SOP version 1.4."
 - Which is the document we just looked at together.
- 13 A Yes that's correct
 - $\ensuremath{\mathsf{Q}}.\ \ \ensuremath{\mathsf{I}}$ think you say this in your witness statement:
 - "I say this not only because of the contents of Ms Hoyte's email of late March 2017 in which she suggests that this was the most recent available version on the planning database at that stage, but also because I have recently tried to find out what was on the planning database as at 22 May 2017. In doing so I reviewed GMP's CLIO site relating to the bombing of the Manchester Arena.
 - Pausing there for a minute, can you explain to the chairman and to those that don't know what GMP's CLIO site is, what that is and how it operates?
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- 1 A. The CLIO site is best described as an incident
- management and action site. It's date stamped where you 2
- 3 upload documents into it. Anybody in GMP can access
- that site under CLIO as long as they've got authority to 4
- 5 do so. And on that site, as well as being date stamped,
- 6 it will also supply actions out to people to -- and then 7 they can reply to those actions and again it is all date
- 8 stamped.
- SIR JOHN SAUNDERS: Is it like HOLMES? 9
- 10 A. Yes, similar to HOLMES.
- 11 MS CARTWRIGHT: As part of the checks you have made as to
- 12 the information about the relevant policy in place.
- 13 I think you tell us that you've located on that CLIO
- 14 site relating to the arena attack an electronic entry
- 15 made by PC Rachel Allen at 02.39 hours on 23 May 2017
- where she had accessed the regional SOP version 1.4. 16
- 17 A. That's correct.

19

21

- 18 Q. So can you just explain what you understand from having
 - seen that Rachel Allen also accessed that same document
- 20 on 23 May 2017? Can you explain what the relevance or
 - significance of that is from your perspective?
- 22 A. From my perspective — in the Jo Hoyte email she sent an
- 23 attachment, which is 1.4. That document has
- 2.4 subsequently been loaded on to our CLIO site by
- 2.5 Rachel Allen at 02.39 hours on 23 May.

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- ${\sf Q}.\;\;{\sf I}\;{\sf think}\;{\sf you}\;{\sf provided}\;{\sf --}\;{\sf sir},\;{\sf I'm}\;{\sf not}\;{\sf going}\;{\sf to}\;{\sf take}\;{\sf you}$ 1
- 2 to the appendix to the witness statement where the
- 3 capture from CLIO has been retrieved and helpfully
- provided by Mr Henderson, but for your record that's
- 5 $\{INQ040411/5\}$. It is very small font and I don't think
- 6 it will assist me to take you to it.
- 7
- I think you also, having identified that
- 8 Rachel Allen had accessed that version 1.4 regional
- 9 guidance, have spoken to her about that document?
- 10
- 11 And I think you tell us you spoke to her on 15 February 12
 - of this year.
- A. Yes. 13
- Q. Can you deal with that discussion you had with her? 14
- 15 A. She informed me she did access version 1.4 as well as
- 16 other plans that she believed would have been beneficial
- at the time of the incident. She does not recall 17
- 18 exactly where she found that SOP version 1.4 or where it
- 19 was downloaded from before she brought it on to the CLIO
- 2.0 system, but she may have accessed the planning database
- 21 to obtain it.
- 2.2 Q. And perhaps just to deal with what you have said there,
- 23 she has accessed somewhere version 1.4 of the regional
- 2.4 guidance?
- 25 A. Yes, that's correct.

5

- 1 Q. And she's then brought it so it sits within the CLIO 2 system?
- 3 A. Yes, that's correct.
- 4 Q. So what you have been able to see and access was that
- document sits within the CLIO actions for 23 May 2017? 5
- 6 A. That's correct.
- 7 Q. And it was Rachel Allen that performed that task?
- 8 A. Yes, it was.
- 9 Q. And you have spoken to her to seek to clarify where she
- 10 got that from?
- 11
- 12 Q. Would that suggest to you also that that was the policy 13 that was available that was thought to be the
- Operation Plato plan as of the time of the arena attack? 14
- 15 A. That's correct, on the operational planning database, 16 ves. I believe so.
- SIR JOHN SAUNDERS: I just want to make sure that I'm 17
- 18 following the effect of all this and the relevance of
- 19
- 2.0 It seems that at no time on this particular database 2.1 was the GMP's own Plato plan to be found.
- MS CARTWRIGHT: Sir, I don't want to give evidence, but 2.2
- 2.3 I can't say what would have been there. But --
- 2.4 SIR JOHN SAUNDERS: Okay. We know that as well as the area
- 25 plan there was actually GMP's own plan.

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- 1 A Yes
- SIR JOHN SAUNDERS: SOP 47 version 5? 2.
- 3 A. Yes. So I believe.
- SIR JOHN SAUNDERS: And that was not on your database?
- 5 A. Not that I'm aware of. It wasn't on our database at 6 that time.
- 7 SIR JOHN SAUNDERS: Okay. So the only thing that was on
- your database was the 1.4 cross-boundary? 8
- 9 A. I believe so. However, we would... We weren't able to
- 10 clarify exactly what was on that planning database
- 11 at the time of the attack. However --
- SIR JOHN SAUNDERS: Why? 12
- A. Because it wasn't -- there would be no electronic 13
- signature as in -- because it was a living document, the 14
- 15 operational planning database —— so plans could be
- 16 uploaded and removed and --
- 17 SIR JOHN SAUNDERS: Without knowing they had been uploaded 18 or removed?
- 19 A. Yes, because they're not date stamped as such. That's 2.0 my understanding of our system.
- 21 SIR JOHN SAUNDERS: Right.
- 2.2 MS CARTWRIGHT: Can I ask then a further question in terms

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- 23 of the ability now because plainly you've been able in
- 2.4 2021 to seek to identify what existed where, but is
- 25 there an audit function within the planning database so

- you actually can see when a policy was entered into your
 - planning database or when it was superseded?
- 3 A. Not that I'm aware of, no.
- 4 Q. In terms of the work that you did in terms of
 - interrogation of what was on CLIO by way of
- Operation Plato or regional, local, did you cause any 6
- 7 other enquiries to be made about any other North-west
- 8 Armed Policing Collaboration documentation or any other
- 9 firearms policy?
- 10 A. Not at that time, no.
- 11 Q. Or subsequently?
- 12 Α No. not that I'm aware of, no.
- 13 Q. I am just seeking to understand perhaps to follow up
- 14 from the learned chairman's question about how far does
- 15 this take us, the fact that version 1.4 sits within the
- 16 CLIO system and was accessed on 23 May.
- 17 A. Yes
- 18 Q. In the course of your preparations to give evidence have
- you looked to identify if any other documents that 19
- 20 post-dated that 1.4 version do exist within CLIO?
- 2.1 A. I'm not aware of any other documents that are on CLIO at
- 22 this stage. However, I didn't do a thorough search of
- 23
- 2.4 Q. Thank you. I think, just to be clear, the time when --
- SIR JOHN SAUNDERS: That's not a good phrase.

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- 1 MS CARTWRIGHT: Pardon?
- SIR JOHN SAUNDERS: That's not a good phrase, "just to be 2 3
 - clear". Thank you.
- MS CARTWRIGHT: In terms of when Rachel Allen accessed that
- 5 version 1.4 of the regional document, just to be clear,
- 6 you are able to say that she accessed that document
- 7 in the Silver control suite at force headquarters?
- 8 A. That's correct.
- 9 Q. And I think, perhaps to follow on from the chairman's
- 10 point in terms of lack of clarity, you say this:
- 11 "I cannot now be entirely sure what was and what was
- 12 not on the planning database at that time and have no
- 13 way of checking precisely what was and what was not
- 14 available at any particular point in the past. If there 15 is a way of providing a snapshot of what was on the
- 16 planning database and/or firearms section of the
- intranet in the past, I am not aware of it." 17
- 18 A. That's correct.

2.0

- 19 Q. Have you spoken to anyone else within GMP to see if
 - those that understand the IT have looked to be able to
- 21 see if that can be captured?
- 2.2 I have spoken to people and they have advised me
- 23 in relation to this that's correct.
- 2.4 Q. Thank you. Then just to complete the Plato aspect of
- 25 your evidence today, please. You tell us that you're

- aware that JOPs 3, edition 3, had come out and you were
- 2 expecting that there was likely to be some form of
- 3 additional Operation Plato plan, but you don't recall
- 4 having had sight of any successor document to
- 5 version 1.4.
- 6 A. That's correct.
- 7 Q. Again, in terms of that, looking out for that sort of
- 8 material or having knowledge of it, would that be in
 - terms of your joint role within the Civil Contingencies
- $10\,$ Unit at GMP but also your work with the Local Resilience
- 11 Forum?

- 12 A. There wouldn't be an expectation —— sorry, could you repeat the question?
- 14 Q. In terms of saying that you were expecting that there
- was likely to be some additional Operation Plato plan because of JOPs 3. the new version, was that because of
- your knowledge of it in the Civil Contingencies Unit but
- ${\tt 18} \qquad {\sf also \ with \ your \ work \ with \ the \ Local \ Resilience \ Forum?}$
- 19 A. Yes, that's correct.
- 20 Q. And you go on to say this as well:
- 21 "It would not surprise me to hear that David Whittle
- had updated a document in early May 2017, but I do not recall it."
- 24 A. That's correct.
- Q. "It is possible that firearms documents such as SOP 47

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- 1 might have been held on the firearms section of the
- 2 intranet. I would not have necessarily have been aware
- 3 of some firearms related guidance and procedures,
- 4 possibly because of the sensitivity of the content."
- 5 A. That's correct
- 6 SIR JOHN SAUNDERS: And appendix C would come into that
- 7 category as well? Are you aware of appendix C?
- 8 A. I am aware of it now.
- 9 SIR JOHN SAUNDERS: And that deals with firearms, so would
- you expect to find that on your database?
- 11 A. Sorry, without going back through the whole of
- appendix C, it may well have been attached to 1.4, so it
- could have been on our database, yes, but I'm not aware of it at this time.
- of it at this time.
- $15~\,$ SIR JOHN SAUNDERS: Okay. So what we're looking at, just so
- $16\,$ we get an overall picture, we are looking at what would
- $17\,$ have been on the database accessible to people at the
- 18 time of the 22 May attack?
- 19 MS CARTWRIGHT: Yes.
- $20\,$ $\,$ SIR JOHN SAUNDERS: Had anyone had time to actually send for
- 21 the plan, this is the limited amount they would have 22 got.
- $23\,$ $\,$ MS CARTWRIGHT: Certainly in terms of this witness and his
- $24\,$ key role in the Civil Contingencies and Resilience Unit.
- 25 SIR JOHN SAUNDERS: Okay.

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- $1 \quad \mathsf{MS} \; \mathsf{CARTWRIGHT} \text{: } \; \mathsf{Just} \; \mathsf{to} \; \mathsf{complete} \; \mathsf{the} \; \mathsf{issue} \; \mathsf{around} \;$
- Operation Plato plans at GMP, you then also in your
- 3 second statement clarified awareness of views made by
- 4 the Inspectorate, HMICFRS, Her Majesty's Inspectorate of
- Constabulary and Fire and Rescue Services, and you say this:
- $7\,$ $\,$ "To the best of my knowledge and belief I was not
- $\boldsymbol{8}$ aware of any comments made by the Inspectorate about
- 9 GMP's Operation Plato plan in late 2016 or at any other
- 10 time."

A. That's correct.

A. No. I wouldn't.

11

13

16

- 12 Q. And again, in terms of your role within the Civil
 - Contingencies and Resilience Unit, would you expect to
- 14 be made aware of comments made by the Inspectorate
- 15 relating to Operation Plato?
- 17 Q. Thank you.
- 18 Can I then move to the second topic to ask you
- about, please, and that relates to your involvement in
- 20 JESIP training, in particular the MTFA joint services
- commander training in early 2017. Perhaps then just by
- 22 way of high-level summary first of all around your role
- relating to JESIP training before we look, please, at
- the email correspondence with Mr Whittle, what was your
- 25 role relating to JESIP training, please?

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- $1\,$ $\,$ A. In relation to training itself , I'm not a trainer as
- 2 such. It was about embedding the JESIP principles and
- 3 also around interoperability, working with partners and
- 4 plans, making sure they were included in some of the
- 5 plans.
- 6 Q. Then can you assist also in terms of when training
- 7 exercises had taken place and if there was learning
- 8 identified from training, what was your role in respect
- 9 of actions arising out of training?
- 10 A. If it was training, then that would normally have sat
- 11 with -- been fed back in relation to training. So from
- 12 training itself they would probably have taken any
- issues or any points back and developed that into their
- 14 plans.
- 15 Q. And then again, in terms of -- just to understand the
- 16 training aspect, where did the training aspect sit
- 17 within?
- 18 A. Training was a separate -- there's different types of
- 19 training within GMP.
- 20 Q. Yes

2.2

- 21 A. Training for firearms would have sat within firearms
 - training. Training for the wider GMP officers would
- 23 have sat within our learning development.
- 24 Q. Learning development. And again -
- 25 A. Operational learning development.

- Q. And again, which directorate about they sit within?
- A. They sat under a different -- operational working
- 3 development -- sorry, learning development. Forgive me,
- 4 I'll get the acronyms right.
- 5 Q. Thank you. One of the aspects you were asked to deal
- with in your second witness statement arises out of an 6
- email that was provided and then some training that the
- inquiry's looked at by reference to the commander 8 9 training from January and February of 2017. So could
- 10 I first of all take you to the email that you sent,
- please, to Mr Whittle. It's, please, $\{\mbox{INQ100059}/1\}$ 11 12 We can see there the email from you to Mr Whittle on
- 13 21 December 2016. Perhaps if we go to the next page,
- please, Mr Lopez, {INQ100059/2}. We can see that on 14
- 15 20 December of 2016, Mr Whittle had forwarded to you
- 16 a version of a training PowerPoint relating to MTFA
- 17 joint services commanders training.
- 18 A Mm-hm
- 19 Q. Setting out the training days and other tri-services
- 20 training then is referenced as well. So first of all,
- 2.1 why would Mr Whittle be providing to you copies of his
- 2.2 training?
- 2.3 A. I assume it was just to cast an eye over it. The main
- 2.4 other reason that he would have sent dates through and
- 25 also the round-up of the two-day JESIP casualty recovery

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- 1 is that we capture our training and exercising on
- 2 a database, a spreadsheet, so that we're able to see
- 3 what GMP has provided to its officers and partners,
- 5 Q. So this email was twofold, to ask you to cast an eye
- 6 over the training that he was proposing to give?
- 7 A. Yes.
- 8 Q. And then secondly, but also to notify you of the
- 9 training dates?
- 10 A. Yes
- 11 Q. And so before seeing this email would you have had
- 12 knowledge about the different sort of training that was
- 13 planned or would this be the notice to you?
- 14 A. I can't recall. It wouldn't surprise me if it was the 15 first contact we've had.
- 16 Q. Okay. Then if we please, Mr Lopez, go back to page 1
- 17
- where we can see your response $\{INQ100059/1\}$. 18 Can I ask you, before we get into the details of
- 19 this, were you aware that the MTFA joint services
- 2.0 commanders training was something that was an action
- 21 following on from Winchester Accord as being needed by
- 2.2 the commanders?
- 23 A. I can't recall if it was at the time, however I have
- 2.4 looked at documents since and it was on recommendation

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25 tracker that's come through or in relation to this point.

- 2 Q. So when did you look at the tracker to identify that?
- 3 A. I would have -- it was on the tracker, I believe, prior
- 4 to this incident and I refreshed it. I think. last week 5
- or, sorry, at the weekend, I think it was.
- Q. So in terms of what you've looked at now, are you able 6 7 to say that that was the genesis or the reason for this 8 commander training arising out of Winchester Accord?
- 9 A. It may have been one of the reasons.
- 10 Q. So we can see that you —— say this:
 - "Thanks for this and I have gone through the
- 12 presentation and have just a few minor points to raise. 13
 - and I mean minor points.
- 14 "On Slide 8 - METHANE. JESIP is keen now to use 15 M/ETHANE as a reporting tool (it doesn't have to a Major
- Incident (I appreciate that this is unlikely in a MTFA
- 16 17 scenario and you do cover it in slide 9)). 18 "I appreciate communications will be a problem but
- 19 there are separate interoperable Airwaves channels 2.0
- available to emergency service commanders and we are not 21 going to refer to the channel that was identified
- 22 there]. It may be beneficial for TFC...."
- 23 And TFC, just to be clear is the tactical firearms 2.4 command?
- 25 A. That's correct.

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2.4

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- 1 Q. "... TFC (support) to have access to these and could be asked for. They are tested weekly."
- 2 3 Pausing there, so in terms of the Airwave support
- and it being tested weekly, is that something just to
- check everything was working properly?
- 6 A. Yes, so there was one channel that was checked weekly
- 7 and I believe it involved the other emergency services.
- 8 Q. Thank you. Then can I ask in terms of what you'd
- 9 already identified to Mr Whittle about a slide still
- 10 referencing METHANE rather than the ETHANE, could you
- 11 assist, that was the change that was brought about by
- 12 JESIP or JOPs 3?
- A. I can't recall exactly where the METHANE or ETHANE came 13
- in, but yeah, METHANE was a recognised acronym for 14
- 15 delivering a message.
- 16 Q. And then on slide: 27 you say this:
- 17 "It mentions recording decision-making not wanting 18 to tie up Airwaves space but these channels are recorded
- 19 and could be used in an emergency."
- 2.0 A. Yes. That's again around making sure that they recorded 21 their rationale or decision—making.
- 2.2 And again would it be fair to say that || literally | you --
- 23 in the knowledge that it's recording, that would become
 - almost your transcript of your thinking process without
- 25 needing to write down or record it?

1 A. That's correct. 1 is cited as a reason for poor communication between 2 Q. Then you list then: 2 staff " 3 '... a number of common issues that have been 3 And then -- I am going to ignore the media plan: 4 highlighted national (sic) (I appreciate they don't all 4 "Acronym use still an issue leading to relate to an MTFA incident)." 5 5 misunderstanding of information shared at scene and And we'll just look at what you brought to control rooms. 6 6 7 Mr Whittle's attention. 7 "Hope this helps." But what was your reasoning for giving a sort of 8 8 Can I ask you then, in terms of that list the 9 shopping list of issues that have been identified by way 9 chairman's seen and we've looked at, that one of the 10 10 of joint organisational learning? learning or one of the issues identified from 11 A. It was basically the best opportunity that we could --11 Winchester Accord and also from another training 12 12 at any time is to put out this learning into a training exercise was the overloading of the FDO as part of 13 or in an environment where other people may take these 13 training exercises having been identified. Would there 14 be any reason why you wouldn't have included that within 14 points and learn from the points 15 Q. So in providing the list of items that we're going to 15 the list of items for drawing to Mr Whittle's attention? A Not in relation to this. This would have been a direct 16 look at together briefly, was the hope that that would 16 17 17 lift possibly from the joint operational learning and figure —— feed into the training that was going to be 18 delivered, the commander training? 18 the key points that they had brought out nationally. SIR JOHN SAUNDERS: So should I imply from that that 19 A. Yes. that's correct. 19 20 $\ensuremath{\mathsf{Q}}.$ In terms of learning to ensure, moving forward, that the 20 nationally as a whole, unlike GMP, the overloading of 2.1 same issues don't reappear? 21 the FDO was not regarded as a problem? 22 A. Yes, that's correct. 22 A. I can't comment on that, that's not in relation to what came out from joint organisational learning at this 2.3 Q. And can I ask then in terms of the bullet points we're 23 2.4 2.4 going to look at where would you have got that list to identify the pointers that you had? 25 MS CARTWRIGHT: Thank you. Can I ask you -- as we can see, 153 155 1 A. I believe it was a seminar I attended earlier, I think 1 this is an opportunity for you to give key learning to 2 it may have been in October 2016, where they had been 2 Mr Whittle to inform training that he was party to 3 raised as key points from joint organisational learning. 3 organising. I'm not going to take you to the Q. Thank you. Perhaps if we look at the list of items you PowerPoints, the chairman has seen the two versions, 5 identified as common issues being reported through joint 5 I think, of the PowerPoints with Mr Whittle and certainly you have reviewed both of those in preparing 6 organisational learning: 6 7 7 "Issues with identification of commanders -- use of for today and can't definitively say which one it was or 8 8 even whether there was a different document you tabards. 9 9 reviewed. Is that fair comment? "Lack of communication between commanders (sometimes 10 despite co-locating). 10 A. That's correct 11 "Not establishing a forward command post. 11 So I'm not going to take you into the detail of those. 12 "Lack of awareness of JESIP and M/ETHANE among first 12 But how else would the learning from training events 13 13 responder staff resulting in delays with response and no such as Winchester Accord be then fed into the firearms 14 FCP set up. 14 unit other than emails like this? "Not using M/ETHANE, so passing of incident 15 15 A. I assume that it would come through a debrief or 16 information ineffective and delayed. 16 firearms -- Winchester Accord firearms training would 17 "Major incident declaration —— evidence of not 17 have been involved in actually planning the delivery of 18 declaring soon enough is delaying response. 18 the exercise. 19 "Issues with each service deploying tactical 19 SIR JOHN SAUNDERS: You went to a conference at which the 2.0 commanders differently resulting in confusion around 2.0 joint organisational learning told you what their

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phones being the default option therefore poor reception $154 \label{eq:first}$

"Risks not shared with organisations arriving on

"Not using Airwave handsets/Talk Groups with mobile

tactical coordinating groups.

scene so staff placed in danger.

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SIR JOHN SAUNDERS: Leaving this aside, what did you do with

results were from looking all over the country at any

problems that there may be.

that information that you gained?

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2	different departments, for example our wider training,	2
3	so that they were aware of what comes out of the joint	3
4	organisational learning. Also, joint organisational	4
5	learning, from memory, also sent out actions for forces	5
6	to take or to deal with.	6
7	SIR JOHN SAUNDERS: So all the relevant people in GMP would	7
8	have got that information?	8
9	A. I believe so.	9
10	SIR JOHN SAUNDERS: Okay, thank you.	10
11	MS CARTWRIGHT: Can I just follow up just specifically in	11
12	respect of some evidence again the learned chairman	12
13	heard from this morning from Inspector Lear. The	13
14	chairman was asking about learning from	14
15	Winchester Accord and this was said by Mr Lear	15
16	effectively that learning points from Winchester Accord	16
17	were the overloading of the FDO and the answer from	17
18	Mr Lear was:	18
19	"I was slightly disappointed yesterday when Dave	19
20	Whittle explained that he had discovered that via our	20
21	Fire Brigade colleague, Neil Gaskell."	21
22	Then he was asked:	22
23	"You said you were disappointed."	23
24	And then effectively was asked:	24
25	"Whose responsibility would it be to feed it to	25
	157	

A. It was to try and -- I would have fed it back to the

you?" 1

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And his answer was:

"I think it would be events planning. They're the ones who I think organised those meetings. Without throwing anyone under the bus, I think Mr Henderson, who's on this afternoon, might be able to answer that question a little bit better.'

So you've not been thrown under the bus, but I think you've been placed in its pathway. So can you assist us a little bit more about clarification of that area that Mr Lear said you could help us with?

A. To the best of my knowledge, two things. One, with Winchester Accord, firearms training would have been involved in actual planning, I would say, of the actual operation because it involved firearms. So feedback would have and should have come through that.

In relation to the actual debrief itself, there would have been a number of recommendations that would have come out of that debrief and I can't recollect if anything in particular related to the firearms, but information should have been fed back in relation to

And also Mr Giladi, who was our superintendent, would have been aware of some of the recommendations that came out of Winchester Accord and, I would have

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assumed, may have been aware that they should have been 2 fed back to firearms training.

3 Q. Thank you. I think if I can take you to --

SIR JOHN SAUNDERS: Sorry, was it your job to feed it back 4

5 as Mr Lear was indicating?

A. If it was involved in the recommendations and there was 6 7 learning that came out of it and it was necessary to 8 feed that back then we would have fed it back from 9 recommendations, yes.

10 SIR JOHN SAUNDERS: That would have been you?

11 A. Not just myself. I believe that June Roby, who's in

12 tomorrow morning, she organised and ran -

13 SIR JOHN SAUNDERS: Okay. Mr Lear said wait for the 14 afternoon for Mr Henderson and you're saying wait for 15 tomorrow with June Roby?

A. She planned, and I don't want again to use that word, 16

17 Winchester Accord, so I'm not 100% sure who was involved

18 in the whole of the planning team on Winchester Accord.

19 I assume that there was a firearms input in relation to that and possibly because they were involved in that,

21 there would have been some formal learning that they

22 would have taken out of that that they would have fed

23 back to them for themselves.

2.4 SIR JOHN SAUNDERS: So you would expect that planner from

2.5 firearms to be feeding the --

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1 A. I have no doubt that they would have had some form of 2 entourage(?) with them when they did the exercise.

3 SIR JOHN SAUNDERS: Thank you.

MS CARTWRIGHT: And I think it's appropriate to perhaps deal

5 at this point -- GMP have alerted us to a document this

6 morning when that evidence was given by Mr Lear. It was

7 a document that wasn't on this witness's evidence

8 proposal, but has been shown to the witness in advance

9 of him giving evidence, but also all core participants

10 have been notified of the document also. So perhaps

11 then could I take you to a document where we can see

12 that Mr Giladi was present by reference to information

13 from learning from Winchester Accord and Mr Lopez it's

14 {INQ007615/1}

15 SIR JOHN SAUNDERS: I don't like people being taken by 16

surprise with documents, but you've had an opportunity

17 to look at it, have you?

18 A. Yes, it was sent to me at lunchtime today.

19 SIR JOHN SAUNDERS: Okay, thank you.

2.0 MS CARTWRIGHT: We can see that this is the minutes from the

21 Major Incident, Public Order and Events Group meeting on 2.2 Wednesday, 7 July 2016. We know that Winchester Accord

23 had taken place over, I think, 9 to 11 May of that year.

2.4 And by way of attendees at this meeting we can see

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Superintendent Giladi, operational planning section, was

1		present, as well as you, at that meeting.	1	MS	S CARTWRIGHT: Of course.
2	A.	That's correct.	2		If we can go to $\{INQ00761/13\}$, please. We saw in
3	Q.	And again in terms of Mr Giladi, you've already told us	3		the minutes you gave a summary, but if we just work
4		he had responsibility in respect of your Civil	4		through each of the recommendations, please, we can see
5		Contingencies Resilience Unit but also an oversight role	5		recommendation 1:
6		for the firearms unit?	6		"Need more training in how the information should
7	Α.	I think he did as well.	7		flow through Gold and Silver. Ensure the two command
8	Q.	Thank you. Perhaps then, if we could, having identified	8		areas are kept separate in the FCM."
9	•	that document, please, Mr Lopez, if we can move to	9		And can you just confirm FCM?
10		{INQ007615/3}. We can see:	10	Α.	Force command module.
11		"5. Exercising and testing/emergency planning."	11		And in terms of what $$ the force command module, is
12		If we can expand, please, the paragraph 17, please.	12	۷.	that effectively the physical space where people are
13		We can see that Sergeant Henderson gave a brief update,	13		located?
			14	۸	Yes. There's in theory three force command modules on
14		that you circulated a copy of the recommendations that		A.	•
15		had arisen out of Winchester Accord for perusal, which	15	^	the third floor at headquarters.
16		was the appendix 8 of this document. And you gave	16	Q.	And then we can see the owner for that action was
17		a brief rundown of the various aspects that each	17		Inspector Roby.
18		recommendation covered. And we can see —— I'm not going	18		That's correct.
19		to take you through all the list $$ that significantly	19	Q.	And there was going to be training sessions. Then
20		at paragraph 7 you gave the update that the exercise had	20		recommendation 2:
21		been	21		"Officers need training in the Gold control roles
22	SIF	R JOHN SAUNDERS: We're not actually looking at	22		and need to understand how Gold control Works. Suggest
23		paragraph 7.	23		a cadre of trained officers ."
24	MS	S CARTWRIGHT: 17, sorry. It's my fault, I do apologise.	24		Again for Inspector June Roby to own that.
25		Paragraph 17:	25	A.	That's correct.
		161			163
				_	
1		"The exercise had been run specifically to test	1	Q.	Thirdly:
2		whether the FDO could work in isolation and it had been	2		"Ensure that key support roles are staffed during
3		established that this did not work. Some work has	3		future exercises, such as IT support and a press
4		already been done in relation to potentially bringing	4		officer ."
5		radio operators from [redacted] to the force	5		Again for June Roby. Recommendation 4:
6		headquarters."	6		"JESIP training needed for officers and commanders."
7		So in terms of issues with the FDO and overloading,	7		Inspector Anthony Hughes was to action that. Can
8		would it be fair to say that you gave that summary	8		you assist: where did Inspector Anthony Hughes $$ which
9		at the meeting at which Mr Giladi was present?	9		team did he sit within?
10	A.	That's correct.	10	A.	He sat within training.
11	Q.	And then in addition if we just move, please, just to	11	Q.	And thank you. Recommendation 5:
12		identify the appendix A at the back of that document	12		"More training required for [force control
13		from page 9, please {INQ007615/9}. We see there the	13		module]/SCC"
14		debrief report from Winchester Accord is that appendix A	14		Again just SCC, please?
15		in the top right—hand corner. And again if we look,	15	Α.	Strategic coordination centre.
16		please, at {INQ007615/14}, if we could expand	16		So again that physical space?
17		paragraph 17, please. We can see there:	17		Yes.
18		"Additional support for the FDO would have helped	18		" IT systems, ensure adequate IT available in correct
19		and would be necessary in the event of a real incident."	19	٧.	locations."
20		Was something that was one of the recommendations	20		That being for June Roby. Then recommendation 6:
21		with the owner of that recommendation being	21		"Ensure adequate Silver cell staff to cope with
22		Chief Inspector Mike Booth.	22		scenario for future exercises ."
23	۸	That's correct.	23	CIL	R JOHN SAUNDERS: I don't think we need to read 7.
					A SOLITA SMOTADENS. I GOLL LITTIN WE HEEG TO LEGG 1.

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MS CARTWRIGHT: 8:

 $^{\prime\prime}\mbox{Need}$ to look at the knowledge and briefing cell and

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SIR JOHN SAUNDERS: Would it be possible to just run through

these recommendations, all of them, just very $\mbox{ briefly ? }$

Τ	now CTU link in and share intelligence with the SCC.	1	Q which can then be scanned and put on CLIO.
2	9:	2	Can you assist us as to that recommendation, please?
3	""Phone list for exercises needs to be by role not	3	A. Again, it is when the partners come in to the FCM or if
4	by name" ——	4	there was and SCC, which is the strategic coordination
5	SIR JOHN SAUNDERS: I don't think we need that one either	5	centre, then their details could be uploaded quite
6	sorry.	6	quickly and they could have access to the CLIO system.
7	MS CARTWRIGHT: 10:	7	Q. And then recommendation 19:
8	"Ensure regular updates sitreps to FCP"	8	"A contingency planner tactical adviser would be
9	Can you explain that, please?	9	beneficial if one could be available."
10	A. It's updates to —— I would say it's forward control	10	And that's for June Roby.
11	point or post.	11	SIR JOHN SAUNDERS: Thank you.
12	Q. And again just in terms of a sitrep, that is obviously a	12	MS CARTWRIGHT: Again then in terms of the matter raised by
13	summary, is that a situational awareness?	13	Mr Lear about the learning from training exercises with
14	A. Yes, a situational awareness correct.	14	Mr Giladi being present at this meeting, how would you
	Q. " from Silver and vice versa."	15	
15		16	expect them —— would you expect that that would then be
16	A. Yes, that's correct.		disseminated and shared, the relevant recommendations,
17	Q. 11 ——	17	with the individuals within his team that would be
18	SIR JOHN SAUNDERS: I don't think we need that.	18	in that capacity?
19	MS CARTWRIGHT: No. 12:	19	A. Yes, that's correct.
20	"Review activation processes. Are key roles getting	20	Q. I'm conscious we've been going for an hour and 15.
21	activated in the correct order?"	21	We can continue but I don't know whether that's an
22	Do you see that?	22	appropriate time to take a short break.
23	A. Sorry, it just flicked off the screen.	23	SIR JOHN SAUNDERS: We'll take a quarter of an hour.
24	Q. Sorry, I do apologise. Recommendation 12:	24	(3.28 pm)
25	"Review activation processes. Are key roles getting	25	(A short break)
	165		167
1	activated in the correct order?"	1	(3.48 pm)
2	A. That again is part of the command module.	2	MS CARTWRIGHT: Mr Henderson, I next want to deal with the
3	Q. 13:	3	final area, but it will span a little bit of time,
4	"Review comms capability at the [training venue].	4	relating to Resilience Direct. Perhaps if we could just
5	Is there a solution to black spots/loss of signal?"	5	identify, you provided your first witness statement to
6	14:	6	directly respond to the policing expert report where
7	"Have a police liaison at the FCP to coordinate and	7	
		8	they had dealt with aspects of Resilience Direct.
8	communicate with partners."		A. That's correct.
9	15:	9	Q. Perhaps if we could first of all identify what
10	"All points within the 'Areas That Went Well' table	10	Resilience Direct is . Was Resilience Direct identified
11	are recognised as good practice and should be continued	11	and brought into force from April of 2014 by way of the
12	in future exercises/incidents."	12	Cabinet Office initiative that had been identified
13	16:	13	following the floodings in 2007?
14	"Continue to nurture and grow relationships between	14	A. That's correct.
15	partner agencies in the GM area."	15	Q. And perhaps, is it right to summarise that
16	Again, was that to ensure interoperability?	16	Resilience Direct ——
17	A. Yes, that's correct.	17	SIR JOHN SAUNDERS: Brought into force in April 2014?
18	Q. Again that was for June Roby.	18	MS CARTWRIGHT: April 2014 but it had been identified from
19	Then there is 17, the recommendation we've already	19	(overspeaking) 2007, yes.
20	identified .	20	Is it right that Resilience Direct is an online
21	18:	21	private network that enables civil protection
22	"Devise a template that can be given to partner	22	practitioners to work together across geographical and
23	agencies to note details of their C&C"	23	organisational boundaries for preparation, response and
24	Is that command and control?	24	recovery phases of an event or emergency?
25	A. Yes.	25	A. That's correct.

- 1 Q. Is it right also that it was brought into force or it
- 2 was there as an initiative because the Civil
- 3 Contingencies Act requires emergency responders to
- 4 cooperate and share information in order to efficiently
- 5 and effectively prepare for and respond to emergencies
- and ensure that action is coordinated? 6 A. That's correct.
- Q. And that Resilience Direct as a tool helps organisations 8
- 9 to fulfil those duties by supporting the adoption of
- 10 common working practices?
- 11 A. That's correct.

- 12 Q. And ensuring that all key information is readily and 13 consistently available to users?
- 14 A. That's correct
- 15 Q. And that you must be a member of an organisation that's
- 16 part of the resilience community, so really the
- 17 category 1 and category 2 responders, broadly speaking?
- A. That's correct. 18
- Q. So having identified what Resilience Direct was and the 19
- 20 fact that it was an initiative from the Cabinet Office,
- 2.1 can we just deal with, as of the time of the arena
- attack in May 2017 it's right, isn't it, that whilst 22
- 2.3 there was some use of Resilience Direct by the
- 2.4 resilience forum and GMP in terms of storage of
- 25 documents, it was not a fully integrated system within

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- GMP? 1
- 2 A. In relation to Resilience Direct, I believe that it was
- 3 used to send out sitreps, but I'm not exactly sure at
- what time those sitreps were sent out in
- 5 Resilience Direct
- Q. So your understanding is that during the arena attack, 6
- 7 Resilience Direct was used to send situational reps?
- 8 A. Yes.
- 9 Q. Okav. Perhaps then if we just look at
- 10 Winchester Accord's learning to see what is identified
- 11 in Resilience Direct there and work through where
- 12 Resilience Direct had got to in May 2017 within GMP and
- 13 the Greater Manchester Resilience Forum.
- A. Yes 14
- 15 Q. If we could look, please, at the tracker for
- 16 Winchester Accord, which is {INQ007536/1}. Is this the
- 17 tracker where you keep track of the learning identified
- 18 from Winchester Accord?
- 19 A. That's correct.
- Q. Mr Lopez, if we could move to {INQ007536/5}, please. 2.0
- 21 We can see under action 36 at line 46, the action
- 2.2 following on from Winchester Accord was for GMP to sign 23 up to Resilience Direct and it would be an action for
- 2.4 your unit to take forward. It records next to it:
- 25 "Completed, protocol being developed."
 - 170

- A. That's correct.
- Q. Can you assist us, because by the time of the arena
- 3 attack there was not the protocol in place, was there?
- 4 A No there wasn't
- 5 Q. So why do we see by reference to Winchester Accord
- in May 2016 the fact that the completed protocol being 6
 - developed if it's not completed by May of 2017?
 - A. I believe this was a living document in relation to the updating of some of these recommendations. So I would
- 10 assume that that's been updated at a later date from
- when initially the Winchester Accord recommendations 11
- 12 occurred.

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- SIR JOHN SAUNDERS: So you're saying that that update on the 13
- 14 end is after 22 May, are you?
- 15 A. I'm not sure when that update was -- I would say,
- 16 looking at it being developed, that it was mid-2016,
- 17 early 2017.
- 18 MS CARTWRIGHT: Perhaps then if we look at the issues as to
- 19 Resilience Direct, please. It's right, isn't it, that
- 20 further training exercises within GMP also identified
- 21 the need for Resilience Direct or the usefulness of
- 22 Resilience Direct as a tool that could be used by way of
- 23 interoperability between different services?
- 2.4 That's correct
- 25 And perhaps if we look at the debrief report that

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- 1 followed on from Winchester Accord which was
- 2 Exercise Triton, please. Mr Lopez, please, it's
- 3 {INQ012544/1}.
 - If we turn over the page, please, $\{INQ012544/2\}$.
- 5 We can see that this exercise was in July 2016. Pausing
- 6 there for a moment, was part of the exercising for
- 7 Exercise Triton to test the Resilience Direct
- 8 capabilities and the Resilience Direct Mapping?
- 9 A. Yes. They were invited in relation to the mapping and, 10 yes, it was part of the test for Resilience Direct.
- 11 So can you perhaps explain to the chairman in terms of
- 12 what mapping is on Resilience Direct and how that
- 13 assists in responding to an emergency?
- A. As explained. Resilience Direct was around sharing 14
- 15 situational awareness and part of that would be -- if.
- 16 for example, I think this example was in flooding, so it would be able to take a picture in relation to the
- 17 18 flooding and be able to pass that on to other people who
- 19 maybe are not at that same room as those other people.
- 2.0 Q. So we move, then, to $\{INQ012544/5\}$, training issues.
- 21 We can see that there was reference to issues with CLIO.
- 2.2 the CLIO system, and then at item 2:

25

- 23 "The assistance of Resilience Direct Mapping."
- 2.4 But by way of training recommendations it says:
 - "This awareness needs to be raised with all partners

- 1 on the systems that will be used during an SCG and TCG." 2
 - Can you just confirm TCG?
- 3 A. Tactical coordinating group.
- $\ensuremath{\mathsf{Q}}.$ And then we can see reference to CLIO, Resilience Direct 4
- and Resilience Direct Mapping. So how at that time did 5 CLIO and Resilience Direct work alongside one another in 6
- responding to an emergency?
- A. As I pointed out, CLIO was our incident management and 8
- 9 action system, Resilience Direct, as you pointed out
- 10 earlier , was more of a system that you could share
- 11 between partner agencies et cetera. So CLIO was very
- 12 much —— you needed to have access to GMP's computer
- 13 system to utilise CLIO.
- Q. So in terms of then -- who, in responding to an 14
- 15 incident, would be permitted access to CLIO? Would your 16 colleagues in the other blue light services, such as the
- 17 Fire and Rescue Service and the Ambulance Service, have
- 18 access to CLIO?
- A. When they were at the force command module, yes, they 19
- 20 would have had access to the CLIO system by logging on 2.1 as part of duty coordinating centre plan.
- 2.2 Q. So they'd be able to get access to it physically at GMP?
- 2.3
- 2.4 Q. But they couldn't access it remotely in the way you can
- 25 Resilience Direct?

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- 1 A. No, unless you had access to GMP's systems, which could
- be a laptop and dongle, et cetera, but no, without 2
- 3 access to GMP's systems, no.
- Q. In that scenario where you have Resilience Direct, you
- 5 have CLIO, would you then have to give training to
- 6 individuals to access and use CLIO at GMP?
- 7 A. Yes. To \log on -- you'd still have to give some form of
- 8 training and log-on access to CLIO as well as
- 9 Resilience Direct.
- 10 Q. CLIO is a GMP system to which you permit others at GMP
- 11 to access
- 12 A. Yes
- Q. But Resilience Direct is a tool introduced by the 13
- 14 Cabinet Office with the benefit in responding to an
- 15 emergency situation that all of the agencies, blue light
- 16 services, if using that Resilience Direct response
- function, could access the same information? 17
- 18 A. Yes. that's correct.
- 19 Q. So would you say that was actually a benefit of the
- 2.0 Resilience Direct over the CLIO system?
- 2.1 A. Yes. I would say it was some form of benefit, ves.
- 2.2 Q. Then perhaps if we turn over the page, please, to the 23
- recommendation from Triton {INQ012544/6}. Under 2.4 response recommendations, please, item 2, we can see it
- 25 was specifically identified to:

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- 1 "Develop the use of Resilience Direct and
 - Resilience Direct Mapping and communicate to
- 3 commanders"?
- 4 A. Sorry, which?
- Q. Response recommendations item 2. 5
- 6 A. Yes
- 7 "Develop the use of Resilience Direct and
- Resilience Direct Mapping and communicate to 8
- 9 commanders."
- 10 A Yes

13

- 11 Q. So can you help us then if we -- we know this was
- 12 learning from an incident in July of 2016, why it was
 - that we get to May 2017 and there's still not the
- 14 protocol agreed by reference to the use of
- 15 Resilience Direct?
- A. As I pointed out in my statement, GMP risk management or 16
- 17 risk manager had issues in relation to the security for
- 18 Resilience Direct. I think I inherited this workstream
- around June 2016. There's a chain of emails you may 19
- 20 want to go to.
- 2.1 Q. Yes.
- 2.2 A. But we were allowed access to utilise the system using
- Triton to test it. Following this exercise, we --23
- 2.4 I approached and wrote a document, I believe it was my
- 2.5 document with others, to sign off that risk assessment

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- with ACC O'Hare at the time so that we could utilise 1
- Resilience Direct within GMP or using GMP systems with 2
 - partners

3

- Q. Perhaps then if we just look at the detail of that. You
- 5 mentioned that there was an issue, and I think -- would
- 6 it be fair to say that -- I think it's a man by the name
- 7 of Mr Ebbitt who had responsibility for IT and, is it,
- 8 also governance structures, had a concern about how
- 9 Resilience Direct would work within the corporate
- 10 systems of GMP?
- 11 That's correct.
- 12 And it's my summary, but tell me if it's not correct,
- 13 but would it be fair to say that he initially was very
- resistant to permitting GMPs's systems to use 14
- 15 Resilience Direct?
- 16 A. Yes, summarising it, that would be --
- 17 Q. And I think to that extent you have provided, and I'm
- 18 not going to now take you through it, a chain of
- 19 emails -- sir, for your reference, so you can look at this in your own time, at $\{INQ034428/4{-}10\}$ $-{-}$ I am not 2.0
- 21 asking for this to be displayed -- we can see a chain of
- 2.2 emails from 9 February 2016 where I think in fact it was
- 23 the Department for Communities who were raising as to
- 2.4 why GMP weren't using Resilience Direct.
- 25 A. Yes

- $1\,$ $\,$ Q. And in fact I think the start of the chain, and I'm not
- 2 going to go through it, in the February of 2016, was
- 3 Alastair Sayles from the Department of Communities was
- $4 \hspace{10mm} \text{wanting clarification as to why GMP were not satisfied} \\$
- 5 to adopt the use of Resilience Direct bearing in mind
- 6 it is accredited to official by CESG. Could you confirm
- 7 what CESG is?
- 8 A. I'm struggling at this stage, but if you come back to9 us, I will do.
- $10\,$ $\,$ Q. And that they were also highlighting in the February of
- 2016 that both Home Office and CTPU -- is that the
 Counter-terrorism Police Unit?
- 13 A. Yes.
- 14 Q. Were registered on Resilience Direct and that also the
- 15 national risk assessment was also held under a closed
- group. And also it was being used and being used
- 17 effectively by other forces in the resilience forums,
- 18 namely Cumbria and Lancashire.
- 19 A. That's correct.
- $20\,$ $\,$ Q. Then again I'm not going to take the chairman through
- 21 that chain of e-mails that runs from page 4 to 10, but
- 22 would it be fair to say that if we look in those emails
- $23 \hspace{1cm} \text{we can see effectively you're chasing Mr Ebbitt about} \\$
- $24\,$ whether or not the essential permissions will be given
- 25 to allow GMP to use Resilience Direct on the corporate

- 1 system?
- 2 A. That's correct.
- 3 Q. And in fact you were then chasing it because part of the
- 4 very reason for Operation Triton in the July of 2016 was
- 5 to test and trial the functionality of
- 6 Resilience Direct?
- 7 A. That's correct.
- $8\,$ $\,$ Q. And that you very shortly, in the July, before the
- 9 training was due to take place, got a caveated
- permission to use Resilience Direct?
- 11 A. That's correct
- 12 Q. And really, time was of the essence at that point
- 13 because Triton was due to take place?
- 14 A. Yes. it was.
- 15 Q. I think to that extent, on 5 July, you email June Roby
- to say that you'd had a meeting with Simon Ebbitt
- yesterday regarding Resilience Direct and agreed the
- following, and then that's referring to his earlier
- email of 4 July where he sets out the use of the
- $20 \hspace{1cm} \hbox{Resilience Direct, but also putting caveats on who could} \\$
- 21 access or what could be uploaded by way of the
- 22 sensitivity of the documentation.
- 23 A. That's correct
- $24\,$ $\,$ Q. You had also indicated that you felt a further meeting
- 25 would be beneficial after the exercise to review GMP's

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1 use of Resilience Direct and any issues.

- 2 A. Yes, that's correct.
- 3 Q. And perhaps it might assist the chairman most of all to
- 4 understand Resilience Direct if we look at a PowerPoint
- 5 presentation that you had provided for Exercise Triton
- 6 to set out, really, Resilience Direct for Dummies.
- If we look at that document, please, at {INQ034395/1}.
 I think this in fact is a PowerPoint. Did you
- 9 create it?
- 10 A. No, I didn't. It was created by our colleagues at AGMA.
- 11 Q. So again just to confirm AGMA is The Association of
- 12 Greater Manchester Authorities?
- 13 A. Yes.
- 14 Q. So this part of the work you were doing within the
- 15 Greater Manchester Resilience Forum?
- 16 A Yes
- 17 Q. Can you identify who was the author of this document?
- 18 A. From memory I think it was Rick Battersby. He was -- he
- delivered the training, as far as I'm aware.
- 20 Q. Thank you. If we turning over the page, Mr Lopez
- $\{INQ034395/2\}$. We can see is the summary there of the
- benefits of Resilience Direct, that it's a tool that
- 23 supports strategic collaboration between partners,
- locally, regionally and within Central Government. And
- then if we please move forward to $\{INQ034395/5\}$. We

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- $1 \qquad \quad \text{then have screenshots for once you're in} \\$
- 2 Resilience Direct and I think it's right, isn't it, that
- there were GMP employees and individuals that had
- 4 themselves individually signed on to use
- 5 Resilience Direct?
- 6 A. Yes, that's correct.
- $7\,$ Q. And I think you tell us about, I think in September of
- 8 2016, there were 84 GMP employees, or somewhere in that
- 9 order, that had been registered so they could use
- Resilience Direct individually?
- 11 A. Yes. It was in the document that —— one of the
- documents that I sent through, but while we are
- referring to it, I can't recall a number, but if that's
- 14 what you say it is.
- 15 Q. And I think there's a later document where we see the
- 16 number is up to about 99.
- 17 A. Yes.
- 18 Q. Would it be fair to say that people registering to use
- 19 Resilience Direct increased before this training
- 20 exercise because that was the whole purpose of Triton?
- 21 A. Yes. that's correct.
- 22 Q. And I think you've also identified that part of those
- 23 that had signed on as individual users for
- 24 Resilience Direct were FDOs?
- 25 A. That's correct.

- 1 Q. And I think on the document you provided, we can go to
- 2 it if need be, both Mr Sexton and Mr Dexter had signed
- 3 on as individual users of Resilience Direct?
- 4 A That's correct
- Q. Would it also be fair to say that actually for 5
- Resilience Direct to work in the way it is intended, 6
- 7 particularly by a force, it required that corporate
- 8 sign-up?
- 9 A. That's correct.
- 10 Q. And that to then feed into how the Greater Manchester
- 11 Resilience Forum worked and operated?
- 12 A. That's correct.
- 13 Q. And how those that fell within the resilience forum.
- 14 including Greater Manchester Fire and Rescue Service and
- 15 NWAS, to use it as a universal tool?
- A. That's correct, and other agencies if required. 16
- Q. Yes. Such as BTP? 17
- 18 A. Yes.
- 19 Q. And perhaps then if we can go to page 6, please, just to
- 20 give an example {INQ034395/6}.
- 21 I have already referenced it's both used as
- 22 a planning tool, so we can see on the screenshot on the
- top the status bar and that there was a section for 2.3
- 2.4 planning. So would that be where all the tri-service
- 25 agencies could store their planning documents --

- 1 A. That's correct.
- 2. Q. $\,--$ for the relevant risk assessments, plans $\,--$
- 3 A. Yes.
- $Q. \ --$ but also minutes of relevant meetings? But
- 5 significantly then, if we go along into response, the
- 6 response tab of Resilience Direct allows real time
- 7 communication between the tri-services in an evolving
- 8
- situation in emergency if it's signed up to by all 9 agencies and there's protocols in place.
- 10 A. Yes, that's correct.
- 11 Q. So that would be -- the response will be what will be
- 12 used in a live-time incident?
- 13 A. Yes, there could be, yes.
- Q. So just using this document, you mention that you have 14
- 15 been able to identify that situational reports were used
- 16 within Resilience Direct on the night of the attack.
- 17 Where would they have been used? In the response
- 18 section?
- 19 A. Without going back, I can't recall, but yes, it would
- 2.0 possibly be in the response.
- 21 Q. And do you know who would have updated those into the
- 2.2 response?
- 23 A. I can't recall at this stage.
- 24 Q. Thank you. So we've seen that the purpose of Triton II
- 25 was to trial and use the functionality of

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- Resilience Direct including that mapping which makes it
 - absolutely clear where the incident is occurring.
- 3

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- 4 Q. And we've noted that part of the learning from the
- 5 Triton was that it was something that would be of use
- for commanders? 6
- 7 A. Yes. that's correct.
- $\ensuremath{\mathsf{Q}}.$ But can you assist then as to why once that permission 8
 - had been given by Mr Ebbitt there was not
- 10 a fast-tracking of ensuring Resilience Direct was a tool
- 11 that was in use by not just GMP but then progressed with
- 12 the Resilience Forum also?
- 13 A. My understanding is in the end of September it was
- 14 signed up by our ACC, Mr O'Hare at the time, where he
- 15 accepted the risk that Mr Ebbitt had highlighted
- 16 previously
- 17 Q. And when you say risk, is that in terms of the risk from
- 18 a data point of view?
- 19 A. Yes, what Mr Ebbitt had highlighted.
- 20 Q. And I think I can take you to that. Again that is
- 21 a document that we see from September of 2016 and
- perhaps it's -- it's {INQ034404/1}, please, Mr Lopez. 22
- We see at page 1 there this is the information risk 23
- 2.4 acceptance document. Is that what Mr Ebbitt had
- 25 required for GMP to use Resilience Direct?

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- 1 A. Yes, that's correct.
- 2 Q. And if we perhaps look over page, please, $\{INQ034404/2\}$,
- 3 the details of possible mitigation. Again, that's
- almost a risk assessment to the use, but it was limited
- 5 to -- it could be used by GMP, up to restricted, for the
- 6 documents?
- 7 A. Yes
- 8 Q. Is it right that actually one of the functions of
- 9 Resilience Direct is it also allows documents of
- 10 a higher security marking than that to be shared on
- 11 Resilience Direct?
- 12 A. I cannot recall at this stage.
- Q. Perhaps then if we go over the page to $\{INQ034404/3\}$ we 13
- see ACC O'Hare has signed that risk assessment on 14
- 15 30 September 2016. So again having that sign-off by an
- 16 assistant chief constable, can you assist as to why then
- 17 there was not a quicker implementation of a move towards 18 the protocol for use of Resilience Direct within GMP?
- 19 A. It was accepted within GMP, but the use was at a wider
- 2.0 base, so that was involving partners as such and that
- 21 would have taken it to the Greater Manchester Resilience
- 2.2 Forum to have a protocol signed off and put in place. 23 Q. I think you tell us in your witness statement that
- 2.4 in November of 2016, in fact 2 November, your line
- 2.5 manager, Inspector Parker, explained to the

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be fair?

A. Yes

1		Greater Manchester Resilience Forum's resilience RDG
2		group, and again, RDG being?
3	A.	That was the Resilience Development Group, which sat
4		under the $$ it was a tactical level or operational
5		level which sat under the strategic.
6	Q.	So that was communicated in November that GMP had now
7		received sufficient reassurance to use

9 A. Yes.

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departments.

- 10 Q. So it was used as a tool to notify people of meetings?
- 11 A. Yes, that's correct.

Resilience Direct?

- 12 Q. And I think you also would use it to store documents?
- Q. But in terms of it being used in a protocol to be able 14 15 to use in an emergency response situation, I think you 16 tell us that a protocol was circulated from the national 17 Resilience Direct team in late 2016/early 2017, and 18 that -- sorry, I do apologise. That came from the 19 national protocol template for Resilience Direct. And 2.0 on the back of that, you developed a protocol for and on
- 21 behalf of the Greater Manchester Resilience Forum for 22 use across Greater Manchester?
- 2.3 A. Yes, that's correct. It would have been in 2.4 collaboration with other colleagues.
- 25 Q. Perhaps if we just look at that protocol, please.

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- $\{\mbox{INQ034403}/1\}.$ There's reference to the protocol in 1 2 earlier minutes in the February of 2017, but in fact the 3 draft version wasn't in place until the May of 2017; is that correct?
- 5 A. That's correct. I think my first draft copy may have been in the January, but... 6
 - Q. And if we then perhaps look, please, at page 4, Mr Lopez $\{INQ034404/4\}$. We can see within that protocol you identify the benefits of Resilience Direct, that it's:

"A secure web-based platform for the resilience community to share real time information and is used for planning, response and recovery. Resilience Direct and the applications within are accredited to official by the planned government accreditor. This includes anything marked as official sensitive as per the Government's security classifications . Resilience Direct helps to facilitate multi-agency collaboration in many ways, including sharing emergency plans among Local Resilience Forum members, sharing situation reports and briefings during an emergency, communicates situation reports to lead Government

And then perhaps if we look over the page, $\{INQ034404/5\}$, we can see reference to the collaborate, under section 2.1, and we can see that:

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12 Q. If I could take you to another document that you provided, I think yesterday in fact, which I think you provided to support how -- the work you had been doing with the resilience forum and within GMP as to how Resilience Direct would operate in practice. It's {INQ040445/1}.

> If you could just assist us, first of all, in identifying this document because it's not a document that had been provided before yesterday, notwithstanding that your witness statement had been provided to address Resilience Direct and the experts' reports comments about that

"The response area of Resilience Direct is set up

with a blank incident report template to allow immediate

use of the area should it be required for the response to an incident. When a response page is created within

Resilience Direct, a default structure is created including a calendar and briefings area which contains

templates for agency reports and situation reports."

So it was really envisaged that Resilience Direct

could be a key area for interoperability communication

in live time during an emergency situation; would that

25 Yes. I think in the expert report -- sorry, what the

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1 experts' report mentioned around the protocol itself was 2 high level strategic and that it lacked any substance in 3 relation to how we may -- when I say we, I mean Greater Manchester Resilience Forum and GMP -- would 5 utilise it in any form of response. So I had undertaken 6 some work in relation to how possibly this could have 7 been done in a response situation.

- 8 Q. So can I ask you then why it took you until yesterday to 9 provide this document?
- 10 I was only given the experts' report, I think, on 11 Friday, which highlighted that there wasn't anything 12 that substantiated the work that might have been 13 required to implement this if the protocol had been sent 14 off -- sorry, signed off.
- 15 Q. Perhaps then if we just identify the experts' opinion 16 within their August 2020 report and then work through 17 this document.

The policing experts say this $\,--\,$ and sir, just for those who wish to follow it, I don't want it up on the screen, it's $\{INQ035309/1\}$ and it is page 77 {INQ035309/77} of that document. I'm reading from paragraph 3.26.14:

"Though an 8-month period may appear lengthy, the Greater Manchester Resilience Forum strategy and work programme of 2015 to 2017 did not indicate that

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- 1 Resilience Direct was a priority, though it does appear 2 explicitly in the programme. We are unaware why it took 3 8 months to reach a final draft stage. The draft 4 protocol was tabled at the May 2017 meeting.'
- 5 Just pausing there, I think in fact it was at the 6 15 May 2017 meeting, wasn't it?
- 7 A. I can't recall without looking at some documents but 8 that might be correct.
- 9 Q. Perhaps then if we do look at that document, please. 10 It's tab 5. {INQ012448/1}, please.
- 11 SIR JOHN SAUNDERS: We haven't heard anything from the 12 stenographers, but when you're reading things, you do 13 read it quite quickly.
- MS CARTWRIGHT: I apologise. 14
- 15 SIR JOHN SAUNDERS: I know you're trying to get through the 16
- 17 MS CARTWRIGHT: These are the minutes of the Resilience 18 Development Group of 15 May 2017.
- 19
- 20 Q. If we move to {INQ012448/3}, please, Mr Lopez, perhaps 2.1 just expand over item 5, please, and the
- 22 Resilience Direct protocol:
- 2.3 "The protocol was circulated prior to the meeting 2.4 via Resilience Direct Collaborate. However, the item was deferred until the next meeting due to time

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"Action: all to feed back any comments to SH [which is you] prior to the next meeting.'

Can I ask, why wasn't it a priority to progress the work on Resilience Direct, particularly bearing in mind the sign-off from ACC O'Hare in 2016?

- A. I'm unable to answer that at this time. We would have fed this through to -- there would have been work ongoing with the team who were doing this, which included from our colleagues at AGMA, the Association of Greater Manchester... and also ourselves, sorry, GMP, and we would have brought this, I think, to a number of the Resilience Group meetings and for sign-off.
- Q. And I think it's right, isn't it, that the experts, at paragraph 3.26.16, go on to describe that protocol as:

"A high level strategic document which describes joint agreement, intention and direction, but it did not explain how Resilience Direct would be embedded into the core functions or mechanisms for multi-agency information and communication, either during emergency planning, emergency response or recovery from a major incident or other serious emergency."

And they say this:

"There was in May 2017 a great deal more development to be addressed once the GMRF had finally agreed to the

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draft protocol."

- 2 That's correct.
- 3 Q. Is it because of that criticism that you produced this 4 document yesterday, $\{INQ040445/1\}$?
- 5 A. That's correct.
- Q. Just tell us then what work had you done to really put 6 7 the detail in that the experts were criticising that's 8 absent from the protocol?
- 9 A. I think in 2016/2017, I had liaised with colleagues on 10 other forces who were using Resilience Direct as
- 11
- a response tool, and getting their feedback, and also
- 12 getting some of the documents and how they processed 13
- Q. So when was it intended that the Greater Manchester 14
- 15 Resilience Forum response to major incidents would be
- 16 finalised?
- 17 A. It was very much in relation to once the protocol had
- 18 been signed off, then it would have been -- this lower
- 19 work or this work would have been able to have taken it
- 20 to the resilience groups and then partners to see if
- 21 they were in agreement to it.
- 2.2 Q. Up until May 2017, we can see that you'd circulated the
- 23 protocol, but had this document we're just going to look
- 2.4 at briefly in a moment been circulated to anyone in the
- 25 Resilience Forum?

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- 1 A. No, not at this stage.
- 2. Q. Why was that?
- 3 A. It was the fact that the protocol hadn't been signed off
- at this stage and it was just a document that I had been
- 5 working on because it was part of the workstream that
- 6 I was interested in doing.
- Q. If we could then display again $\{\mbox{INQ040445}/1\}.$ 7
 - Thank you.
- 9 This is the document that you'd been working on?
- 10 A. Yes

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- 11 Q. And would it be fair to say then that only you had
- 12 access to this document prior to the arena attack or had
- 13 anyone else seen it?
- A. Limited probably to the team. I don't recall if anybody 14
- 15 else on the wider (sic) had access to it.
- 16 Q. Can we move, please, to $\{INQ040445/6\}$. We can see there
- an example of a type of form that could be used for 17
- 18 notification of an incident on Resilience Direct.
- 19 A. Yes, that's correct.
- 2.0 Q. Was that something that was taken directly from the
- 21 Cabinet Office document for Resilience Direct?
- 2.2 I can't remember. I'd looked at a number of different
- 23 documents in relation to other forces, et cetera, and it
- 24 may have been taken directly from there, I can't
- 2.5 remember.

1 Q. Then, please, if we move into the document itself at 2 {INQ040445/48} 3 We can see that it had also envisaged use of 4 a commonly recognised information picture tool document. 5 We can see on that page also: "Detailed guidance notes appeared with this document 6 7 And again, do you recall whether this was something 8 9 taken directly from the Cabinet Office Resilience Direct 10 toolkit? 11 A. I can't recall at this stage. Q. We can see that the benefit of this document is it 12 13 allows a clear place to record the METHANE 14 documentation, but give up-to-date situational 15 awareness; would you agree? 16 A Yes 17 Q. If we want to look for annex 1, we can see that, please, 18 Mr Lopez, at {INQ040445/52}. 19 Again, would this be the identification of clear 2.0 tools to be used by all three blue light services or 2.1 other category 1 or 2 responders? 2.2 A. It could be, yes Q. And then, please, we can see annex 2, which is at 2.3 2.4 {INQ040445/55}. An example of —— perhaps just expand 25 the bottom half of the page, please, Mr Lopez.

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Again, an example of a document template for the

METHANE format. Again, it would have been accessible 2 3 and usable by all blue light responders if it had been in place? 5 A. That's correct. Q. Perhaps to best typify the benefit of these documents, 6 could we look at, please, $\{INQ040445/60\},\,Mr$ Lopez. 7 8 We can see in the bottom row of that document: 9 'Where can I access situational awareness quickly? 10 Resilience Direct is the Government's secure digital 11 platform to share information and is supported by JESIP. 12 The JESIP doctrine also supports the concept of 13 a multi-agency information cell at an SCG to support 14 situational awareness and decision-making.' 15

Would you agree that would be one of the key benefits of having Resilience Direct and usable by all blue light services?

18 A. Yes.

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19 Q. I think it wasn't until, was it, the following year 2.0 before Resilience Direct was in fact then -- the lack of 21 a Resilience Direct protocol was rectified in June 2018?

2.2 A. I believe so, yes.

23 Q. The experts have said this and I want to give you an 2.4 opportunity to comment on both of these aspects, please.

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25 They say this, and I'm at {INQ035309/226} of their report, I'm not asking for it to be displayed:

2 "An example of how Resilience Direct could have been 3 used would be for... METHANE assessments could have been shared using Resilience Direct." 4

5 I think, looking at what you'd envisaged, that would 6 certainly be the case?

7 A. It could be, yes.

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8 Q. And that also they say that:

> "Resilience Direct was available to the GMP FDO at the time of the arena attack."

11 A. He had an account, yes.

12 Q. They also say that:

> "Resilience Direct is deliberately designed to be able to operated both as part of the major IT arrangement but as also a entirely standalone capability using Wi-Fi or mobile phone internet access and it certainly could have been operated at the forward command post."

19 A. I believe so.

20 Q. Again, would you agree that's a significant benefit of 2.1 Resilience Direct over the CLIO system?

22 A. Yes, it would be.

2.3 Q. And the experts are also of the view that:

2.4 "Resilience Direct access would have provided 2.5 scene—based multi—agency tactical Silver commanders with

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1 access to stored emergency and major incident plans, the 2 arena contingency planning, live information exchange 3 between control centres and the forward command post,

together with the mapping function."

5 A. It's quite a lot, but yes, that could be a possibility .

6 Q. And they also seek to illustrate that:

"The information void between multi-agency control rooms and between control rooms and the forward command post is not inevitable and that the capability in Resilience Direct exists to enable first responder JESIP interoperability if it were available."

12 A. I believe so, yes.

13 Q. Thank you.

The chairman has your detailed statement that deals with other aspects. I'm not going to take you to any further of those at this stage as the chairman has the ability to review. I'm going to now turn to those, unless, sir, there's anything particular about

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Resilience Direct you wish to explore.

2.0 SIR JOHN SAUNDERS: No. thank you.

21 MS CARTWRIGHT: Could I first of all turn to GMP to see --2.2

no, I should go to the families first . I think it's

23 Mr Atkinson on behalf of the families who's asking the

2.4 auestions.

25 MR WEATHERBY: In fact, it's me.

- MS CARTWRIGHT: I do apologise, Mr Weatherby.
- 2 MR WEATHERBY: I have not got many questions. Thank you
- 3 very much, Ms Cartwright.

Questions from MR WEATHERBY

5 Mr Henderson, very quickly, with respect to

- Resilience Direct, have I understood you correctly, that it was available for use on the night by the FDO and for
- 8 use at the scene?

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- 9 A. The protocol as such hadn't been signed off. The
- document that we've just gone through was a draft document, so it wouldn't have been seen at this stage by the FDO.
- ${f 13}$ Q. Right. So you would not have expected the FDO or the ${f 14}$ ground—assigned tactical firearms commander, for
- example, to have used it?A. Not at this stage because of where we were in the
- development of Resilience Direct.
- 18 Q. Yes. That's very helpful clarification .
- No criticism implied of you, but given that this was available from 2014 from the Home Office, would it be fair comment to say that Greater Manchester Police had
- dragged their feet in bringing Resilience Direct into
- 23 force, into use?
- A. I would disagree because of what we went through
 previously, how we had issues in relation to security.

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- $1 \hspace{1cm} \hbox{That was signed off, I believe, at the end} \\$
- 2 of September 2016, and then we were developing
- 3 a protocol with partners to actually implement it.
- Q. Okay. I won't take this much further, but if I've
- 5 understood your evidence correctly it took 4 years to
- $\,\,$ $\,$ $\,$ bring Resilience Direct into proper use, and that was
- 7 significantly after the arena attack.
- $8\,$ $\,$ A. With the dates, that's correct. $\,$ I cannot comment,
- 9 really , on what happened with GMP and the system before 10 I inherited the workstream as such.
- 11 Q. Okay, I won't pursue that any further. Can you just
- 12 help us? Again, have I understood you correctly that
- Resilience Direct was used to some degree on the night?
- 14 A. That's my understanding.
- 15 Q. If the protocol was some way off being finalised and
- signed off, and you expressed the view that neither the
- FDO nor the ground—assigned TFC would be expected to use
- 18 it, why was it used at all on the night?
- 19 A. It would be giving out situational awareness and I'm not 20 sure if there was any minutes or proposed meetings that
- 21 were held. It would have been used in relation to that.
- 22 Q. You were careful to say that your understanding was that
- it had been used to send out situational awareness, but

 vou weren't sure when. Would I be right to read from
- you weren't sure when. Would I be right to read fromthat that it was later on in the incident that the
 - 198

- 1 situational awareness had been put on the system?
- 2 A. Yes, I believe so.
- 3 Q. So in terms of who did use it on the night, are you able
- 4 to help us as to who from Greater Manchester Police did
- 5 use it?

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- ${\bf 6} \quad \ \mbox{A.} \ \mbox{Not at this stage.} \ \mbox{However, I can come back with that.}$
 - From memory I can't recall.
- 8 Q. The chair may be assisted by that. Who else apart from
 - GMP actually used it on the night? Did Fire and Rescue,
- for example?
- $11\,$ $\,$ A. Again, I would have to come back with you in relation to
- 12 that comment.
- 13 Q. You've referred to CLIO. Resilience Direct, just to
- 14 make clear to everybody listening and indeed to me, is
- 15 a secure web—based tool to share information and help
- interoperability; is that a fair way of summarising it?
- 17 A. That's my understanding, yes.
- 18 Q. CLIO is an incident management system?
- 19 A. And action management, yes.
- $20\,$ $\,$ Q. And action management. So in terms of practicalities in
- 21 an emergency such as the arena attack, the utility of
- 22 CLIO and the utility of Resilience Direct would be
- 23 similar; is that right?
- 24 A. Sorry? I don't understand.
- Q. Well, the purpose of both systems would be to share

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- $1 \hspace{1.5cm} \mbox{situational \ awareness, share} \hspace{.1cm} --\hspace{.1cm} \mbox{you've given the example}$
- 2 of flooding with photographs or plans.
- 3 A. Yes.
- $4\,$ Q. Share information that would be useful in whatever the
- 5 emergency or incident was.
- 6 A. Yes.
- $7\,$ $\,$ Q. So the purpose of both Resilience Direct and CLIO would
 - be similar in that they would both be used for the
- 9 sharing of information that would be useful in real time
- 10 in the management of the emergency?
- 11 A. Yes

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- 12 Q. The significant difference for our understanding of
- it is that in order to use CLIO, you'd have to be in
- 14 Greater Manchester Police HQ, logged into that section
- of the GMP computer system, whereas with
- Resilience Direct, as long as you had a secure log-in
- $17 \hspace{1cm} \text{and permission, you could be sat in } \mathsf{Fire} \hspace{0.1cm} \mathsf{and} \hspace{0.1cm} \mathsf{Rescue} \hspace{0.1cm} \mathsf{HQ}$
- 18 or some other location?
- 19 A. Yes. You don't have to be in GMP's headquarters, you
- $20\,$ could have been anywhere in the GMP or GMP computer or
- 21 laptop.
- 22 Q. For Resilience Direct?
- 23 A. No, for CLIC
- $24\,$ $\,$ Q. You'd have to have access to the GMP system, whereas
- 25 with Resilience Direct you wouldn't?

- 1 A. That's my understanding, yes.
- Q. Okay. That's helpful, thank you. 2
- 3 Just finally in relation to CLIO then, you referred
- 4 to, I think it was, Rachel Allen uploading the Plato
 - regional document, the version 1.4 that we spoke about
- or we discussed earlier; yes? 6
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- Q. And you've ascertained that she uploaded version 1.4 to 8 9 the CLIO database at 02.39 on the 23rd, so 4 hours into
- 10 the incident
- 11 A. That's correct.
- Q. Okay. You're here and she isn't, so if you can't answer 12
- 13 this, please tell us. The purpose of doing so would be
- to share that policy with anybody involved in the 14
- 15 incident that had security clearance on CLIO and needed 16 to know?
- 17 A. I wouldn't be able to answer that at this stage
- in relation to --19 Q. That would be a reasonable inference, wouldn't it?
- 20 A. Possibly, yes
- 21 Q. Would it be right that Ms Allen must have got the policy
- 2.2 from the GMP database that you spoke about at the
- 2.3 start -- and we'll come on to it in a minute -- and
- 2.4 uploaded it on to the CLIO system to give access to
- 25 a greater degree of persons?

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- 1 A. I think we outlined earlier in my statement that you
- 2 (sic) could not categorically recall where she uploaded
- 3 that document from, but I do believe that it could have
- been from the operation planning database.
- Q. All right. Let's move on to that. That's my final
- topic, to reassure everybody about timing. Just in 6
- 7 terms of the database that you spoke about before, you
- 8 were involved with the management of policies and plans
- 9 on one GMP database to which officers generally would
- 10 have access?
- 11 A. That's correct.
- 12 Q. And then there was a separate database, which was more
- 13 restricted, operated by the firearms unit?
- 14 A. It would not be a database that everybody would have
- 15 access to
- 16 Q. Sorry, that is obviously my fault. That was the
- 17 distinction I was trying to draw. So the database that
- 18 you spoke about earlier in your evidence was the general
- 19 Greater Manchester Police database of policies that you 2.0 managed?
- 21 A. Plans, mainly plans, and there may have been some 2.2 policies there, but yes, mainly plans.
- 23 Q. Okay. There was a separate database which was
- 2.4 restricted and that was for firearms policies?
- 25 A. That's what I believe in relation to what's been

- explained to me today.
- 2 Q. Okay. So the document that we've just been talking
- 3 about from Rachel Allen was the document that was
- 4 discovered, in fact, in response to the email thread of
- 5 Jo Hoyte that you looked at at the beginning of your
- evidence? 6
- 7 A. That's correct.
- Q. Right. So the inference is that it was taken from the 8
- 9 Greater Manchester Police database, or copied from that
- 10 database, and put on CLIO for greater readership on the
- 12
- Α To those who would have access to the CLIO site, ves.
- 13 Q. Yes. I've got that right, okay.
- 14 A. Yes

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- 15 Q. Finally, this, then, sticking with that document, but
- 16 a different angle to it. So in response to that email
- 17 thread, which originated from the national guidance
- 18 coming through to Greater Manchester Police, a search
- 19 was done of the unrestricted Greater Manchester Police
- 20 database that you managed?
- 2.1 A. Yes
- 2.2 Q. And the version 1.4 document was found on that database;
- 2.3 ves?
- 2.4 Sorry, you've lost me. Is this, what, on the night? Α
- 25 Q. No. It's obviously my fault, it's late in the day, I'm

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- sorry. Two databases. The one you managed and the
- 2. firearms database. You've given evidence that in
- 3 response or as a result of the Jo Hoyte email thread
- 4 that you looked at earlier --
- 5 A. Yes

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- 6 ${\sf Q.}\ --$ the Plato regional document, the version 1.4, was
- 7 identified on the unrestricted database that you
- 8 managed?
- 9 A. Yes, the operation planning database.
- 10 Q. Yes. That was in March. That same document crops up
- 11 again on 23 May, as we've looked at. We know from the
- 12 evidence we heard yesterday and this morning that
- 13 a particular version of appendix C to that document was
- 14 in force on the March date and had been superseded by
- 15 the May date. Do you follow?
- 16 A. Okay.
- Q. So that document had a number of appendices. We've been 17
- 18 looking at one of the appendices. One version was in
- 19 force in March and the other one was in May. Am I right
- 2.0 that you're unable to assist us as to which version was
- 21 there in March when this document was identified and
- you're also unable to assist us with which version was on that document in May when Rachel Allen uploaded it on
- 23 2.4 to CLIO?
- 2.5 A. No, because you should be able to open that document on

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1 CLIO. 1 MR ATKINSON: No, thank you very much, Ms Cartwright. 2 Q. Right. 2 Mr Weatherby has covered all that I would otherwise have 3 SIR JOHN SAUNDERS: Mr Weatherby, are we sure that 3 needed to ask. Thank you. 4 appendix C would have been attached to the 1.4 document 4 MS CARTWRIGHT: Sir, there's only then Mr Horwell who would have questions on behalf of GMP. I do apologise, that went on the general database? I only say that 5 5 because it has details about firearms operations, which Mr Mansell. Can you confirm how long you think you may 6 6 7 you might expect not to go on the general database. I'm 7 be in questioning? only asking whether it would have been or not. MR MANSELL: Around 10 minutes. 8 8 9 Do you happen to know? Do you know whether appendix 9 SIR JOHN SAUNDERS: Mr Mansell, you broke up the first time, 10 10 C was attached to that document on your database? but if you sit closer to the computer, when you leant 11 A. I'm not 100% sure. I can go back and check. 11 forward I think we heard you better. MS CARTWRIGHT: I was going to say, sir, the witness is 12 12 Questions from MR MANSELL 13 providing an additional statement. Perhaps in that he 13 MR MANSELL: The first topic I'm going to ask you about, 14 14 could clarify whether there was an appendix C as part of Mr Henderson, is Winchester Accord 15 the attachment to the email of Jo Hoyte of 29 March, but 15 Can we have up, please, Mr Lopez, $\{INQ007615/1\}$. These are the major incident public order and events 16 also clarify the document that's uploaded to CLIO. 16 17 whether or not there's an appendix C that sits within 17 group meeting minutes of 7 July 2016 that you were asked 18 that document, which might allow the best clarification. 18 about: ves? SIR JOHN SAUNDERS: Okay. Mr Weatherby, I may be raising a 19 19 A. Yes. that's correct. 20 hare which means nothing and it may be that it was 20 $\mathsf{Q}.\;\;\mathsf{If}\;\;\mathsf{we}\;\mathsf{go}\;\mathsf{to}\;\mathsf{page}\;\mathsf{3},\;\mathsf{please},\;\mathsf{we}\;\mathsf{can}\;\mathsf{see}\;\mathsf{the}\;\mathsf{feedback}\;\mathsf{you}$ 2.1 attached to both, but I just think it might be a good 21 gave about Winchester Accord. If we could zoom in on 2.2 idea to check, might it? 22 the bottom half of the page, please. $\{INQ007615/3\}$. MR WEATHERBY: With respect, I entirely agree, sir. That 2.3 23 I'm looking at paragraph 17, Mr Henderson, where you 2.4 should have been a question I asked before the one 2.4 25 I did. That would be very helpful and that would deal 2.5 "The exercise had been run specifically to test 205 207 with the point. Perhaps we could add to it that if 1 1 whether the EDO could work in isolation and it had been established that this did not work. Some work has 2 appendix C was appended to the March attachment and 2 3 the May download, perhaps we could know the versions of 3 already been done in relation to potentially bringing 4 radio operators from [operationally sensitive] to force SIR JOHN SAUNDERS: Do you understand the point, 5 5 headquarters." 6 Can you see that? 6 Mr Henderson? 7 7 A. Yes. I do understand that. A. Yes. I can. SIR JOHN SAUNDERS: We'd like you to check on those, please. 8 8 Q. Did that accord with your understanding that during the 9 9 MR WEATHERBY: Finally, this. So far as the other document exercise, the FDO was not in his usual location in the 10 operational control room?

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A. I believe so. ves.

A. That's correct.

that your understanding?

A. From the feedback, yes.

Q. And the reason for that was to test during the exercise

room to force headquarters would be effective?

Q. That can come off the screen, please, Mr Lopez.

and required more information and assurances?

whether the proposed move from the operational control

Q. And the exercise appeared to demonstrate that that move,

as it was planned at the time, was not a good idea; was

Moving next to Resilience Direct, you've explained

that GMP had security concerns about Resilience Direct

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- 10 you were asked about, SOP 47, version 5, you can confirm 11 that that wasn't found on the general database; yes?
- 12 A. From what I'm led to believe, no, I don't believe it is, 13 but I can't(?) tell you what was on the database at that
- 14 15 Q. You're simply unable to say whether or not it was on the
- 16 firearms database in either March or indeed in May?
- 17 A. I wouldn't have had access to the database, the firearms 18 database, so I wouldn't be able to tell you that.
- 19 MR WEATHERBY: Thank you very much. Those are all the 2.0 questions I have.
- 21 MS CARTWRIGHT: Could I briefly make an enquiry of others?
- 2.2 I understand there's only a very small portion of
- 23 questioning left. There was an indication that
- 2.4 Mr Atkinson may have one small area he wished to cover.

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25 Can I clarify that? 2.5 Q. In essence, were those concerns around the potential for

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1 a large number of people being able to access sensitive A. That's correct. 2 Q. Does that normally occur only once the force command police documents? 3 A. I believe so 3 module or FCM is established? Q. Mr Lopez, please can we have $\{\mbox{INQ034412}/1\}$ on the 4 4 A. Yes, normally unless they had access to GMP systems 5 screen, please. 5 previous to the CLIO signed in. Q. In May 2017, would you have expected the three blue 6 Is this your paper setting out the position 6 in relation to GMP and GMRF and Resilience Direct 7 7 light services to be communicating using CLIO in the 8 8 in September 2016? early stages of an incident or not? 9 A. I did mention in my statement that it wasn't signed or 9 A. The force using GMP systems and them logging in to it, 10 10 dated. However, I believe that looking back at it, it was a possibility, yes. 11 I was involved in the writing of it, yes 11 Q. At the force command module? 12 12 Q. Thank you. Can we move, please, Mr Lopez, to A. Yes MR MANSELL: Thank you, Mr Henderson. 13 $\{INQ034412/3\}$, the bottom of that page. It's the 13 14 penultimate paragraph. 14 Sir, that is all I ask 15 It says: 15 SIR JOHN SAUNDERS: Thank you very much, Mr Mansell. Further questions by MS CARTWRIGHT 16 "Security level of Resilience Direct. The security 16 17 level of the system has been challenged by some of the 17 MS CARTWRIGHT: Sir. I have one question, and obviously 18 police forces across the UK, including GMP. 18 Mr Mansell must come back if he wishes to. It's just on 19 Historically , there has been a reluctance by all 19 the September 2016 document that the witness was taken 2.0 partners to upload sensitive information to RD, limiting 20 to. Could I ask for that to be displayed, please? 2.1 the multi-agency use and general buy-in." 21 {INQ034412/5}. 22 Were you aware that GMP's security concerns were 22 Conclusions and recommendations. I think you've 2.3 shared by other forces? 23 identified. Mr Henderson, that this was the paper that 2.4 2.4 A. In this document, I believe so, ves. I can't recall at vou wrote, but we can see under your conclusion and this stage where that information may have come from, 2.5 recommendations for Resilience Direct, you say this: 209 211 1 but I must have been at the time of writing. 1 "Resilience Direct provides a government backed Q. Mr Lopez, that can come off the screen. 2 2 suite of tools which whilst not all organisations within 3 SIR JOHN SAUNDERS: Can you tell me the date of that 3 GMRF require all of the functionality, it provides document? a means to use all of the functions in a compatible MR MANSELL: It's 28 September 2016, sir. 5 5 multi-agency environment (especially in a response phase SIR JOHN SAUNDERS: Thank you very much. By then it was 6 of an incident). Whilst it is used by some partners 6 7 7 clear that the IT manager who had the concerns was more than others, its role is essential for those who do 8 8 satisfied with security. That's just what we had on not have another means to send and receive restricted 9 9 documents. For this reason, it is likely that screen. 10 MR MANSELL: Yes. 10 Resilience Direct's use would be critical during Mr Henderson, is that right, that this coincides 11 11 a threat-based major incident where all related 12 with ACC O'Hare signing off the risk assessment for 12 information would be very sensitive. There is 13 Resilience Direct in September 2016? 13 a government expectation that Resilience Direct would be 14 A. That's correct. 14 used as a reporting tool to provide situational SIR JOHN SAUNDERS: Thank you. 15 15 awareness. It would therefore be beneficial for GMP and 16 MR MANSELL: And then did the work pass to the GMRF for the 16 GMRF's partners to have embedded familiarity with development of the protocol on Resilience Direct? 17 17 Resilience Direct to enhance ad hoc no-notice required 18 A. It did. 18

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of 2016?

A. Yes, for the resilience forum.

A. Yes.

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can access CLIO if they have access to the GMP computer

Q. Finally, this: CLIO. You explained that other agencies

Q. And you were working on that; yes?

Q. But on behalf of the GMRF; is that right?

A. Yes, that's correct.

system; is that right?

A. That's correct.

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And was that your considered position in September

SIR JOHN SAUNDERS: And then you got to work on producing

 $\ensuremath{\mathsf{SIR}}\xspace$ JOHN SAUNDERS: And then when that was put before the

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1	forum for discussion, the discussion was actually put	1	INDEX
2	back to a future hearing because of lack of time?	2	
3	A. Yes, that's correct.	3	INSPECTOR SIMON LEAR (sworn)1
4	SIR JOHN SAUNDERS: How much is the gap between these	4	Questions from MR GREANEY1
5	forums? How long is the gap?	5	Questions from MR WEATHERBY64
6	A. I think Is it every $$ it may be quarterly. I could	6	Questions from MR HORWELL102
7	double check. I will come back to you on that.	7	
8	SIR JOHN SAUNDERS: I think that may be what we'd actually	8	INSPECTOR STEPHEN HENDERSON (sworn)112
9	heard before.	9	Questions from MS CARTWRIGHT112
10	MS CARTWRIGHT: So it assists $$ and it might be helpful to	10	Questions from MR WEATHERBY197
11	clarify $\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \$	11	Questions from MR MANSELL207
12	reference to it, protocol being discussed in the minutes	12	Further questions by MS CARTWRIGHT211
13	in February of 2017. Then in the minutes for 15 May it	13	
14	references that there's no time to discuss it, but there	14	
15	is reference that it would be discussed at the meeting	15	
16	the following week, so perhaps the witness could clarify	16	
17	that.	17	
18	SIR JOHN SAUNDERS: Perhaps we'd better look at that, yes.	18	
19	MS CARTWRIGHT: Does Mr Mansell wish to come back at all in	19	
20	respect of that additional question I asked?	20	
21	MR MANSELL: I don't, thank you.	21	
22	MS CARTWRIGHT: My understanding is that concludes all of	22	
23	those who have questions this afternoon. Can	23	
24	I thank you, sir, for sitting later and also the	24	
25	witness.	25	
	010		015
	213		215
1	SIR JOHN SAUNDERS: You don't need to thank me. Thank you		216
2	to everyone else and perhaps particularly to those who		210
3	are actually making a note of it all, who must be worn		
4	out at the end of today.		
5	MS CARTWRIGHT: I offer my sincere apologies to the		
6	stenographers.		
7	SIR JOHN SAUNDERS: You don't need to. It was a criticism		
8	frequently made of me.		
9	Tomorrow we have June Roby.		
10	MS CARTWRIGHT: That's correct. We're scheduled to hear		
11	from her and conclude her by lunchtime.		
12	SIR JOHN SAUNDERS: Will we if we start at 10.00 or should		
13	we start at 9.30?		
14	MS CARTWRIGHT: She is scheduled to give evidence by video		
15	link at 10 o'clock, please, and so can we leave it that		
16	we adjourn until 10 o'clock?		
17	SIR JOHN SAUNDERS: Yes.		
18	I'm very grateful for your assistance, thank you		
19	very much. If you would do the things we've asked for,		
20	I would be even more grateful. Thank you very much.		
21	(4.57 pm)		
22	(4.57 pm) (The inquiry adjourned until 10.00 am		
23	on Wednesday, 24 February 2021)		
	on vicunesuay, 24 i ebituary 2021)		
24 25			

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