

# OPUS2

Manchester Arena Inquiry

Day 66

February 23, 2021

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Tuesday, 23 February 2021

(10.15 am)

MR GREANEY: Sir, good morning. I'm sorry we are starting a few minutes later than even the delayed start today; there was a good reason for that. The gentleman in the witness box is someone that we heard a good deal about yesterday, it's Inspector Simon Lear, and I will ask that he be sworn by Andrew, please.

INSPECTOR SIMON LEAR (sworn)

Questions from MR GREANEY

MR GREANEY: Would you begin, please, by telling us what your full name is?

A. Simon Andrew Lear.

Q. Are you an inspector with Greater Manchester Police?

A. I am, sir.

Q. Have you served for a period now in excess of 20 years?

A. I have, sir.

Q. In fact, about 22 years?

A. That's right.

Q. Did you move to the tactical firearms unit of GMP in 2003?

A. I did.

Q. And serve there in the rank of constable until 2005?

A. That's correct.

Q. And then, later, in February 2012, having been promoted

1

by that stage to the rank of inspector, did you return to the firearms unit?

A. I did.

Q. At that stage did you have responsibility for a firearms team?

A. I did.

Q. So would it be right to describe your role at that stage, February 2012, as being an operational role?

A. That's correct, yes.

Q. At that stage, so still early 2012, and into the mid-part of 2012, did you have any responsibility for the development of firearms policy?

A. No, sir, not at that time.

Q. Or Operation Plato policy?

A. No, sir.

Q. As the inquiry knows, the first iteration of what we now know to be SOP 47, so v1, and I know that you'll be familiar with that.

A. That's right, yes.

Q. The inquiry knows that the first iteration of that plan or policy is dated 25 July 2012. Did you have any involvement in the development of that plan?

A. No, sir.

Q. But in the early stages of your involvement, having returned to the firearms unit in 2012, were you aware of

2

the coming into effect of that plan in July 2012?

A. I was, yes.

Q. Still dealing with matters of background, in 2012 when you joined the unit, how many inspectors were there in the firearms unit?

A. There were eight in total, sir.

Q. Sir, for your information, I'm in the first statement of Inspector Lear at paragraph 2.

So there were eight inspectors?

A. Yes.

Q. Over time, was there any impact upon the number of inspectors within the unit?

A. Over the next couple of years, sir, it went down from eight to five and then finished at three.

Q. What about other members of policing staff, so sergeants and constables? Was there any --

A. No, that was constant, sir.

Q. But nonetheless, the number of inspectors reduced from eight at the beginning in 2012 over a couple of years to three?

A. That's right, yes.

Q. Which is, as Mr Whittle agreed yesterday, a substantial reduction. What would you describe the consequences of such a substantial reduction in manpower at inspector level as having been?

3

A. Please bear with me. I then moved from operations to the policy unit, I think it was 2013/14.

Q. Can I ask you to pause for one moment? You're very softly spoken.

(Pause)

A. Basically, after being on the unit for approximately 2 years, then I was redeployed from the operational teams to the Policy Compliance Unit --

Q. I'm going to ask you about that in a moment, but I don't wish to interrupt your answer.

A. If I can put it in some sort of context, when the policy unit was first created, there was a chief inspector in charge, there was an inspector, there was a sergeant, and there were three or four staff. When I inherited it a few years later, I had a sergeant who shortly after -- I was there about a year and then he went temporary to leave me on my own. Shortly again after being in the policy unit, approximately a year after that, I then inherited the whole of the firearms training school as well, which up until that point had had a full inspector, that being Dave Whittle who was here yesterday.

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

4

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  
 5 to at the end of 2017, but you moved away from firearms  
 6 policing altogether, did you not?  
 7 A. Completely moved away from the firearms role, yes.  
 8 Q. So, as you'll appreciate, you've said more there than  
 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.  
 14 You mentioned the PCU. Before we delve into the  
 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, yes.  
 19 Q. And then to add to your responsibilities , in 2015,  
 20 I think you told us, you became responsible for the  
 21 firearms training school?  
 22 A. As well, sir, yes.  
 23 Q. And whereas the staff members in the PCU, as you told  
 24 us, went from chief inspector down to constable at one  
 25 stage, once you became responsible for the PCU, which is

5

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?  
 4 A. That's correct, yes.  
 5 Q. So in short, there were many fewer officers within that  
 6 department from that point in time?  
 7 A. Significantly less .  
 8 Q. And I think what you're saying to us is that ultimately  
 9 that was to place you under a degree of pressure that  
 10 was intolerable?  
 11 A. Yes, sir .  
 12 Q. We just need to understand what the PCU was, the Policy  
 13 and Compliance Unit. When was that unit, as you  
 14 understood it, implemented or brought into existence?  
 15 A. I believe it was as a result of the inquest which was  
 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  
 20 you were heading it, include the maintenance of policy?  
 21 A. It did.  
 22 Q. Was that policy just for firearms situations or more  
 23 generally?  
 24 A. No, just purely firearms .  
 25 Q. So one responsibility was the maintenance of policy for

6

1 firearms situations . Would that include what became  
 2 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 followed?  
 9 A. Yes.  
 10 Q. And also acting as secretary at force level meetings?  
 11 A. That's correct, yes.  
 12 Q. What did that involve?  
 13 A. So it would be like taking minutes of meetings.  
 14 Q. 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  
 21 role operational at that stage?  
 22 A. No, sir. I was still an authorised firearms officer ,  
 23 which I needed to do to conduct my training  
 24 responsibilities , but actually going out on the street  
 25 any more, I didn't do that.

7

1 Q. So there was a division between operational firearms  
 2 officers --  
 3 A. Yes.  
 4 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 A. Yes.  
 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  
 22 make sense?  
 23 A. It does, yes.  
 24 Q. The PCU had responsibility for compliance?  
 25 A. Yes.

8

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 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  
 24 been an onus on the individual, the policies are open  
 25 and published, to read them themselves and then they

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.

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  
 4 a criticism of you, but it might be suggested that it's  
 5 not ideal to expect an officer to just read those and  
 6 know how to respond in what would be a highly pressured  
 7 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  
 13 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  
 17 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  
 22 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.  
 25 Q. Do you think, looking back and being, as I know you will

1 be, frank about it, that the PCU in the period from 2014  
 2 to 2017 was properly resourced to properly conduct its  
 3 role?  
 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 impact that that under—resourcing had.  
 8 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  
 11 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  
 18 for firearms, the thematic(?) 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.

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  
 12 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  
 18 MTFAs 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?

13

1 A. Yes, sir.  
 2 Q. A post-incident manager?  
 3 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  
 18 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  
 22 Greater Manchester Police has now recognised that and  
 23 they have now separated again with chief inspector and  
 24 inspectors in both roles.  
 25 Q. So they have now recognised it, but to your mind should

14

1 it have been obvious at the time between 2014 and 2017?  
 2 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  
 14 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  
 18 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  
 25 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  
 11 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  
 14 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.  
 17 Q. And we're going to come on to look at the Whittle plan  
 18 and I genuinely don't mean any criticism of you or him,  
 19 but the degree of panic that you felt under --  
 20 A. Yes.  
 21 Q. -- do you think that it would be fair to say that that  
 22 resulted in inadequacies in the Whittle plan?  
 23 A. I think the plan per se is okay and I think it's  
 24 workable and I think -- when I took the plan to be  
 25 quality assured they also gave us, shall we say,

16

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.  
 6 A. — and say, "Please urgently review your plans", for us  
 7 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.  
 14 As you rightly say, the refreshed guidance from  
 15 CTPHQ came out in the March of 2017.  
 16 A. Yes.  
 17 Q. But in November 2016, in fact 3 November 2016, as we  
 18 heard in evidence, the Inspectorate had said to  
 19 ACC Hankinson there are problems with your Plato plan,  
 20 talking about v5.  
 21 A. Yes.  
 22 Q. You and I know what we're talking about.  
 23 A. I know exactly, sir.  
 24 Q. Are you aware that we've heard evidence to that effect?  
 25 A. I saw it yesterday.

17

1 Q. So you've spoken about a period between March or  
 2 April/May 2017?  
 3 A. Yes.  
 4 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  
 20 a real-world Plato incident was at, to say the least,  
 21 risk of being overloaded?  
 22 A. Definitely, definitely.  
 23 Q. And yet a difference between v5, the Giladi October 2016  
 24 plan, and the Whittle May 2017 plan, was that on the  
 25 face of it the FDO was given more to do, not less?

18

1 A. Mm, I understand that.  
 2 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  
 6 state of affairs and think: that doesn't seem like the  
 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  
 11 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  
 20 if we had waited slightly longer, then it would have  
 21 allowed whoever was going to create those more time to  
 22 do so.  
 23 Q. I think the problem, as we're going to discover, is that  
 24 if the idea was that there should be action cards or  
 25 something similar, they hadn't come into effect within

19

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  
 4 don't know.  
 5 SIR JOHN SAUNDERS: Do we have any evidence that that was  
 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.  
 11 Q. Let's just work it out. In 2017 everyone knew that  
 12 in the event of a real-world Plato event that the FDO  
 13 would be overburdened?  
 14 A. Yes.  
 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  
 20 been an FDO but for me it seems to make sense that  
 21 there'd be so much activity inside that control room, so  
 22 many calls coming in, so much would be going on, I can't  
 23 see how one person on their own would be able to do  
 24 that.  
 25 Q. So this is really a very significant policing problem,

20

1 isn't it?  
 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?  
 6 A. I agree with you, sir, yes.  
 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 --  
 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  
 18 done? What concretely was being done in May 2017, or  
 19 earlier, to put in place a system of action cards so  
 20 that those in the force control room would know,  
 21 "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

21

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 A. I fully understand that, sir.  
 11 Q. What was being done with Mr Booth, or anyone else from  
 12 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  
 15 a disconnect or a failure of communication between those  
 16 responsible for Plato policy and those responsible  
 17 within the control room for implementing it to work out  
 18 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 responsibility 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  
 24 staff, do they know about Stay Safe and all that sort of  
 25 stiff. So I think that Mr Giladi was the central pin to

22

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  
 9 make it work?  
 10 A. Definitely, sir -- or to make these cards. And what  
 11 the --  
 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  
 17 going to be overwhelmed. So shouldn't something be put  
 18 in it just to the effect: this plan is done on the basis  
 19 that the FDO is in charge and is to ensure these things  
 20 are done, but it's quite impossible -- we accept  
 21 it would be quite impossible for him to do it and  
 22 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 quite rightly said, that one person couldn't do all  
 2 those tasks. Again as I said, these tasks, it's not  
 3 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 saying. 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  
 16 responsibilities not just for firearms officers, it  
 17 created responsibilities for unarmed officers who would  
 18 be at the scene?  
 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  
 24 people, you could devise the plan, but you had to leave  
 25 it to other people to decide how that would be

24

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  
 6 that force control room so that when what happened on  
 7 22 May happened, people knew what their job was?  
 8 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.  
 16 Q. I don't want to be unfair to someone who isn't here at  
 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?  
 21 A. Yes.  
 22 Q. You're on the firearms side of it. Someone needs to  
 23 connect you to him, don't they?  
 24 A. Yes, sir. My assumption, maybe it's a completely wrong  
 25 assumption and maybe we shouldn't be making assumptions,

25

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  
 4 were there on the ground and are, I suggest, in  
 5 a position to help us and your perception -- and if your  
 6 perception is wrong, it can be corrected, no doubt --  
 7 is that Superintendent Giladi was the one who was to  
 8 join these dots together?  
 9 A. That's correct, yes.  
 10 Q. Right.  
 11 SIR JOHN SAUNDERS: Okay, but what we've actually seen  
 12 is that practically immediately from the time it was  
 13 finished, it is brought into effect?  
 14 A. That's right, yes.  
 15 SIR JOHN SAUNDERS: So there's no much opportunity for  
 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.  
 20 MR GREANEY: As you saw the evidence yesterday, it's a point  
 21 that the chairman made.  
 22 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  
 24 said -- you mentioned this word about panic about  
 25 bringing this policy in --

26

1 Q. You used the word panic.  
 2 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.  
 5 A. But I don't know why... You alluded to HMIC giving  
 6 feedback in -- was it November?  
 7 Q. 3 November was the hot debrief, yes.  
 8 A. If we were given that, we could have started working on  
 9 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.  
 21 Q. Sure, and I have no doubt most people will understand  
 22 exactly what you're saying, that if you'd had from  
 23 3 November, or shortly afterwards, to review the  
 24 Operation Plato plan then some of the inadequacies, if  
 25 that's what they were, in the plan that was created

27

1 might not have existed. There would have been more time  
 2 to coordinate with the communications branch. But in  
 3 the result you didn't have from November or December, or  
 4 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.  
 13 MR GREANEY: What would be the driver for an amendment to  
 14 the policy? So the chairman's point is, if I may say  
 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  
 20 or did something need to happen or some instruction need  
 21 to be given for a change to occur?  
 22 A. Policies can change for a number of reasons. It could  
 23 be national guidance, for example, as in this case, but  
 24 it could also be, shall we say, testing. For example,  
 25 if we had an exercise and something didn't work and

28



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  
 5 November that would have automatically started a revamp.  
 6 Q. Let's look at what the feedback was. We really are  
 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  
 15 during 2016. So GMP's Operation Plato plan. He is  
 16 talking about version 5, so the Giladi plan, which in  
 17 fact was created for the purposes of the Inspectorate's  
 18 visit :

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

22 That's a reference to the ACPO TAM guidance:

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

29

1 (Operation Plato) had been regularly reviewed."

2 Next page, please. {INQ029796/15}:

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

13 And this:

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

30

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?

9 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.

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  
 25 advice that was given there from HMIC and then tried to

31

1 progress it.

2 SIR JOHN SAUNDERS: And then you would have worked some way  
 3 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  
 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  
 10 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  
 16 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  
 21 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  
 24 meeting or a Chief Officers' Group meeting. I think it  
 25 was for Mr Potts, who was the ACC to, show that we'd

32

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 .  
 5 Q. So did you have the authority, as an inspector within  
 6 PCU, to say to Inspector Booth, "This is what I expect  
 7 your team to do" ?  
 8 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  
 20 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  
 23 anything that you want to say about what you have said  
 24 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  
 2 Policing Collaboration. I'm at your first statement,  
 3 paragraphs 9 to 15. What is and was the North—west  
 4 Armed Policing Collaboration?  
 5 A. The North—west Collaboration is a training  
 6 collaboration. We always had something beforehand, sort  
 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  
 14 to go back over that.  
 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 —  
 20 A. That's correct.  
 21 Q. — be that local policy or procedure?  
 22 A. Yes, sir .  
 23 Q. With the creation of the collaboration, which you've  
 24 been able to confirm was in 2012, was a decision made  
 25 about what had been described as standing operating

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  
 5 47 — indeed, Plato was the last one — but many of them  
 6 would be for irrelevant things such as which boots  
 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 A. 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  
 20 say, my resources in county A are all tied up at a job,  
 21 so we could ask the neighbouring force to assist. So  
 22 that was the thought process with regards to the  
 23 cross—boundary policy.  
 24 Q. The way in which you explain it in your second  
 25 statement, I'm at paragraph 4, is that what developed

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 MTFAs 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?  
 20 A. Yes, sir .  
 21 Q. And at paragraph 57 of that second statement, so  
 22 page 12, you identify those that were in force. I used  
 23 the date yesterday of 4 May. The date you've used is  
 24 12 May, which is the better date. You state there:  
 25 "For the avoidance of doubt, before 12 May 2017, the

1 following three documents were in force as [you  
 2 understood] it."  
 3 The cross-boundary ARV capability SOP v1.4?  
 4 A. Correct.  
 5 Q. That's the overarching regional policy. Appendix C,  
 6 version 1.10?  
 7 A. That's correct, yes.  
 8 Q. Which was the regional MTFFA policy. And SOP 47,  
 9 version 5.  
 10 And you're very clear, are you not, that those are  
 11 the policies that were in force at the material time?  
 12 A. In my mind, sir, yes.  
 13 Q. What I want to focus on are SOP 47 v5 and Mr Whittle's  
 14 subsequent plan of 4 May 2017. First of all SOP 47 v5.  
 15 Did you know that v5 was being prepared by  
 16 Superintendent Giladi in late 2016?  
 17 A. Yes, sir. I knew it was being prepared, or I believed  
 18 it was being prepared for the HMIC visit.  
 19 Q. Did you assist in its preparation?  
 20 A. No, sir.  
 21 Q. Did Superintendent Giladi consult you in relation to its  
 22 preparation?  
 23 A. No, sir.  
 24 Q. In October of 2016 did you know that in the event of  
 25 a real-world terrorist attack during which

37

1 Operation Plato was declared the FDO was likely to  
 2 become overburdened with responsibilities?  
 3 A. My strong suspicion, sir.  
 4 Q. And was it your belief that Superintendent Giladi would  
 5 also have known that fact?  
 6 A. Again, I would strongly suspect he would do.  
 7 Q. Against that background, can we look at v5 together,  
 8 please, and so this is {INQ039970/1}.  
 9 Was the first time that you saw v5 once it had  
 10 actually been created?  
 11 A. I couldn't tell you the date, sir. When it was done he  
 12 would have sent it to me for the purpose of updating and  
 13 putting on the intranet, our internal GMP computer  
 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,  
 20 sorry?  
 21 MR GREANEY: The date is October 2016.  
 22 SIR JOHN SAUNDERS: Thank you.  
 23 MR GREANEY: We can see -- we looked at this yesterday with  
 24 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:

38

1 "Reference documents. The following documents  
 2 should be referred to in conjunction with this  
 3 document."  
 4 And there's then a reference to the joint operating  
 5 principles, the JOPs, edition 2. As I have said, this  
 6 document is dated October of 2016. By that stage JOPs  
 7 edition 3 had been in existence for 10 months and do you  
 8 agree that Superintendent Giladi's v5 is therefore  
 9 referring a reader to an out-of-date version of the  
 10 JOPs?  
 11 A. I would agree with that, sir, yes.  
 12 Q. We then see that the reader is referred to "Initial  
 13 Response to a Marauding Terrorist Firearms Attack by  
 14 North-west Region Force Firearms Resources, version 7,  
 15 5 August 2014", and we could probably spend the rest of  
 16 the day talking about that document if we were inclined  
 17 to, but we won't because I think you can confirm that  
 18 your strong view is that that version of the regional  
 19 policy never came into effect?  
 20 A. That's right, sir. I would tend to suggest that the  
 21 correct version would be the annex C, either 1.9 or  
 22 1.10. I don't know off the top of my head, but yes.  
 23 Q. Again, the reader of this document is being referred to  
 24 a source that is not the correct source?  
 25 A. That's correct, sir, yes.

39

1 Q. Just two points that emerge from that. First of all, do  
 2 you agree that it might not be regarded as ideal to have  
 3 within a plan a reference to a whole series of other  
 4 substantial documents?  
 5 A. I fully agree, sir, yes.  
 6 Q. And secondly, even if that is a good idea to do, you  
 7 ought to refer the reader to the right documents and not  
 8 the wrong ones?  
 9 A. That's correct, yes.  
 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?  
 20 A. I think it's operational control room, I think.  
 21 SIR JOHN SAUNDERS: It occurred to me -- I was going to say  
 22 yesterday we had a huge number of acronyms and actually  
 23 it's almost as quick to give the full title. You've  
 24 done it less today than I think happened yesterday.  
 25 Just for the listener who doesn't have the documents and

40

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.  
 5 SIR JOHN SAUNDERS: It doesn't just apply to you, it applies  
 6 to everybody. Otherwise you're spending the whole time  
 7 working out what the acronym actually stands for.  
 8 MR GREANEY: We do. Where I know what the acronym stands  
 9 for, it won't be in every case, I will use the full  
 10 description.  
 11 SIR JOHN SAUNDERS: We do have a list of the acronyms and  
 12 what they mean somewhere? Certainly that could be  
 13 supplied to the press, which might help them.  
 14 MR GREANEY: It's on the website, I think. Mr Suter is  
 15 agreeing with me.  
 16 SIR JOHN SAUNDERS: Right. But for the person who is  
 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 —  
 21 SIR JOHN SAUNDERS: It was for my wife! I have had that  
 22 private information.  
 23 MR GREANEY: I'm extremely sorry to hear that, sir. I take  
 24 responsibility for that and I'll try to do better.  
 25 SIR JOHN SAUNDERS: She hasn't time to listen that often, so

41

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 room?  
 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.  
 16 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 Q. — force duty officer is in, or FDO, I should talk about  
 20 the?  
 21 A. Force control room.  
 22 Q. The force control room.  
 23 A. That's how I would understand it.  
 24 Q. I probably have confused myself now.  
 25 A. Maybe I'm wrong, sir, sorry.

42

1 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  
 4 standard operating procedures 47. Could we have page 6  
 5 on the screen, please? It's the bottom of the page,  
 6 "Force duty officer actions" {INQ039970/6}.  
 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:  
 11 "The actions of the force duty officer in the  
 12 initial stages of a marauding terrorist attack are  
 13 crucial. The following actions are not exhaustive and  
 14 the FDO will need strong support from the OCB."  
 15 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?  
 23 A. Certainly in that document.  
 24 Q. It might be read as suggesting or indicating clearly  
 25 that some level of delegation would need to occur?

43

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  
 4 be delegated and you'd agree with that?  
 5 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.  
 14 A. I think, also as well, yes, if the FDO did them it's  
 15 introducing time delays to the other actions that need  
 16 to be created(?) as well.  
 17 Q. You might just need to explain that to me in a little  
 18 more detail.  
 19 A. Could I ask to turn over the page?  
 20 Q. Certainly. Could we go to {INQ039970/7}. Is it the top  
 21 half of the page?  
 22 A. Anywhere like that. They need to contact a tactical  
 23 adviser, so pick up the phone and get in touch with the  
 24 tactical adviser. They have to then put that phone down  
 25 and pick up another and get in touch with the firearms

44

1 commander. Quite a way down is:  
 2 "Inform emergency services once Operation Plato's  
 3 been declared."  
 4 That really should, if I was going to put them in  
 5 hierarchical order, would be near the top to allow other  
 6 agencies to work. But is that more important than  
 7 getting in touch with the senior national coordinator,  
 8 is that more important than asking for additional  
 9 support? What I'm trying to say if you did the top one  
 10 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.  
 22 Next I'm going to ask you about the Whittle plan.  
 23 I will begin by asking you about the origin of the plan,  
 24 although I think you've probably covered it in a fair  
 25 amount of detail already.

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  
 4 referred to in terms of when you were given the tasks.  
 5 As we know, the hot debrief from the Inspectorate was  
 6 3 November 2016. Is it the position that it was on  
 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?  
 14 A. That's correct, yes.  
 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?  
 20 A. Correct, yes.  
 21 Q. So as we know, Inspector Mark Nutter and Inspector  
 22 Richard Thomas?  
 23 A. That's right.  
 24 Q. I think Inspector Nutter would have been an officer you  
 25 knew very well?

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  
 6 whole process. He was armed policing lead for  
 7 Greater Manchester.  
 8 Q. Having received your instruction from  
 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  
 21 the document to be completed by Friday, 5 May 2017?  
 22 A. I did, yes.  
 23 Q. And did you then get in touch with Sergeant Whittle to  
 24 indicate what was required of him?  
 25 A. I did, yes.

1 SIR JOHN SAUNDERS: Had the original instruction to you to  
 2 get him to do it given you a time bracket when it had to  
 3 be done by?  
 4 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.  
 8 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  
 15 is:  
 16 "This involved a period of approximately 4 weeks  
 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."  
 20 A. I do, yes.  
 21 Q. And I think we should probably understand from the  
 22 evidence you have given today, when you said "I consider  
 23 it to be quite fast", that involves a degree of  
 24 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.  
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?  
7 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  
12 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.  
25 Q. -- v5, which dealt, we saw yesterday, with things in

49

1 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  
12 responsibility in the event of an MTFA?  
13 A. That's right, sir, less directing to different  
14 documents, one document.  
15 Q. So insofar as there is a difference between you and  
16 Sergeant Whittle, there it is, that it was your  
17 intention that SOP 47 should be replaced as well as  
18 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 he was confused yesterday. He said both of those  
22 things. He said that he thought 47 would still run in  
23 conjunction, but then he also said it was the intention  
24 to create one document.  
25 Q. Anyway, you're clear about what your intention was?

50

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  
8 Collaboration, what consultation was there, either by  
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  
12 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  
17 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 version 2 because in our mind it was -- 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.

51

1 Q. I've understood.  
2 At the time at which you and Sergeant Whittle were  
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  
19 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  
23 discovered that via our Fire Brigade colleague,  
24 Neil Gaskell.  
25 Q. You said you were disappointed. Do you mean that your

52

1 view is that your team, the PCU team, the two of you  
 2 in the PCU, should have been informed in some more  
 3 formal way by your force of the learning points from  
 4 Exercise Winchester Accord?  
 5 A. Well, yes, sir. As I said before, incidents such as  
 6 that should feed policy, should allow us to develop and  
 7 if we don't know it's broken, we don't...  
 8 Q. No. You did know about the --  
 9 A. Yes, sir.  
 10 Q. -- problem with the force duty officer. But as we have  
 11 understood, one of other problems identified was JESIP  
 12 working, interoperability --  
 13 A. Right, sir.  
 14 Q. -- but that was not fed into you, as you have said?  
 15 A. No, sir.  
 16 Q. Next --  
 17 SIR JOHN SAUNDERS: And whose responsibility would it be to  
 18 feed it into you?  
 19 A. I think it would be events planning. They're the ones  
 20 who, I think, organise those meetings. Without throwing  
 21 anyone under the bus, I think Mr Henderson, who's on  
 22 this afternoon, might be able to answer that question  
 23 a little bit better.  
 24 MR GREANEY: Sir, I'm not very far from concluding my  
 25 examination of this witness, but this would be

53

1 a convenient moment for a break.  
 2 SIR JOHN SAUNDERS: Okay. Back at quarter to.  
 3 MR GREANEY: Thank you, sir.  
 4 (11.28 am)  
 5 (A short break)  
 6 (11.45 am)  
 7 MR GREANEY: Inspector, we're next going to look, as  
 8 I indicated, at the Whittle plan itself, albeit not in  
 9 any great detail. The INQ reference is {INQ029178/1}.  
 10 We'll just look at a short passage in order to  
 11 illustrate some evidence that you gave earlier. Could  
 12 we go, please, to {INQ029178/4}.  
 13 There are two observations that I would like you to  
 14 consider, both of which I suspect you'll agree with  
 15 given what you've said already. First of all,  
 16 notwithstanding that everyone well knew that the FDO was  
 17 liable to be overwhelmed in the event of an  
 18 Operation Plato situation, this version of the plan  
 19 added substantially to the responsibilities upon the  
 20 FDO, did it not?  
 21 A. It certainly did, sir, yes.  
 22 Q. Secondly, whilst not for a moment ignoring your evidence  
 23 that your understanding was that a scheme of delegation  
 24 should be introduced, it seems to be the position that  
 25 within this plan the reference even to delegation had

54

1 been removed.  
 2 A. It's not in there, sir, no.  
 3 Q. I think you can probably see how those two matters were  
 4 capable of causing a problem.  
 5 SIR JOHN SAUNDERS: Okay, sorry, this is -- the black parts  
 6 on this are what were originally in appendix C.  
 7 Appendix C included reference to delegation, did it?  
 8 MR GREANEY: I'm not sure --  
 9 SIR JOHN SAUNDERS: You said it had been removed. That's  
 10 what I didn't understand.  
 11 MR GREANEY: Let me be clear. What I mean is that within  
 12 the -- you've understood what I meant. Within  
 13 version 5, as we saw and as Mr Horwell indicated  
 14 yesterday, there is a reference to the FDO needing  
 15 substantial support, or some similar phrase, from the  
 16 staff within the operational control room or OCB,  
 17 I think is the term used. Here there is not even  
 18 a reference to that, is there?  
 19 A. No, sir.  
 20 SIR JOHN SAUNDERS: Thank you. And you were intending it to  
 21 replace SOP 47 as well?  
 22 A. Yes.  
 23 MR GREANEY: Sorry if that wasn't clearer.  
 24 SIR JOHN SAUNDERS: No, no, that's fine.  
 25 MR GREANEY: You provided the plan to Superintendent Giladi?

55

1 A. Yes, sir.  
 2 Q. And as you understood it, he was taking it to a chief  
 3 officer meeting?  
 4 A. That's right, sir, yes.  
 5 Q. And did you come to understand before 12 May that the  
 6 plan that had been prepared by Mr Whittle was approved  
 7 by your superiors?  
 8 A. Yes, I was, sir, yes.  
 9 Q. Is that why you circulated the plan, along with other  
 10 documents, to officers, including the FDOs, on  
 11 12 May 2017?  
 12 A. That's correct, sir. I don't have the authority to send  
 13 out a policy if it's not been authorised.  
 14 Q. We'll look at the email that you sent, and I'm very much  
 15 towards the end of my questions now, just to assist  
 16 Mr Weatherby, who'll be on next. Your email, which we  
 17 did see yesterday, and which I'm certain you will have  
 18 read recently, is {INQ039966/1}.  
 19 We see your email timed at 13.58 hours on 12 May,  
 20 sent to, among others, the OCR duty inspectors.  
 21 Sergeant Whittle, as he was, told us yesterday that that  
 22 would have included the force duty officers.  
 23 A. That's correct, sir.  
 24 Q. You agree with that, do you?  
 25 A. I do.

56

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  
5 yesterday.  
6 Could I just ask you a couple of questions about it,  
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?  
11 A. I am aware of that fact, yes.  
12 Q. Mr Weatherby drew it to our attention yesterday. Do you  
13 think that was a potential problem?  
14 A. I fully agree. I can't give you any reason why I would  
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  
21 reading it would think it was a draft and not a final  
22 plan and might not therefore understand they were  
23 supposed to implement it?  
24 A. There was the potential for that, sir.  
25 Q. The potential, and that's a fair way of putting it.

57

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  
4 version 5?  
5 A. No, I don't explicitly say that, sir, and certainly  
6 after a long period of reflection over the last couple  
7 of weeks, I would send the email differently if I were  
8 to do it today.  
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.  
16 Let me just ask you this before we move to a small  
17 number of final matters: we know, don't we, that  
18 Inspector Sexton was in the position of force duty  
19 officer on the night of 22 May?  
20 A. Correct, sir.  
21 Q. And had to deal with an awful situation which arose  
22 shortly after 10.30? A very difficult situation. Which  
23 plan would you have expected Inspector Sexton to  
24 implement on 22 May in that situation of the plans that  
25 we've considered?

58

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.  
5 Q. Although you would acknowledge, I think, that that was  
6 not a plan in respect of which anyone had received  
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?  
18 A. I did, sir.  
19 Q. And you were present for the assurance visit by,  
20 I believe, Inspector Nutter on 19 July 2017?  
21 A. I was, yes.  
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  
24 about them.  
25 What I do want your help with is this, a separate

59

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  
4 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  
8 about how they should deal with a situation in which  
9 armed officers move into a hot zone and there are  
10 persons present within that zone assisting casualties.  
11 A. I think, sir -- are we able to bring up JOPs?  
12 Q. Yes.  
13 A. 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  
17 to? The reference is {INQ008372/1}, and the paragraph  
18 to which you have directed our attention, inspector, is  
19 6.6 {INQ008372/25}. So edition 3, January 2016, and  
20 it's page 25.  
21 Shall I just read out paragraph 6.6 and then you can  
22 give whatever evidence you want to in relation to it?  
23 "During the course of an attack uninjured people may  
24 not wish to leave casualties. Given the hazardous  
25 nature of warm zones it is necessary that bystanders be

60



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

9 I'll just conclude that paragraph:

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

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

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

61

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

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

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

16 A. No, sir.

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

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

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

62

1 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  
6 about it. So do you think that is possible, that people  
7 just didn't think it was going to happen?

8 A. I think ... It's a very difficult thing to say for other  
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  
13 always engaged with exercises and I think there were  
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  
17 we were certainly trying to do our best.

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

20 MR GREANEY: Thank you, sir.

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

63

1 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.

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

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

13 Q. The Ian Terry tragedy, I think you mentioned early on in  
14 your evidence, and of course there was the further  
15 tragedy of the Anthony Grainger shooting in 2012. The  
16 background is the Greater Manchester Police Firearms  
17 Unit and policy, throughout the whole of this period,  
18 from 2008 to 2017 and further, was one of great  
19 scrutiny, wasn't it?

20 A. It definitely was, sir, yes.

21 Q. Yes. Would you therefore agree that the chronic and  
22 serious under-resourcing of the Firearms Policy Unit is  
23 difficult to understand in that context?

24 A. I agree with you, sir. Certainly when you compare it to  
25 the resources when it was created.

64

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.  
5 Q. Did you raise it with anybody else? I'm not suggesting  
6 you 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  
10 think it was an agenda item or anything like that, it  
11 would have just been a discussion between ourselves.  
12 Q. Would it have been on one occasion or more than one  
13 occasion?  
14 A. I certainly remember talking to him on at least one  
15 occasion, but it was quite evident from what I was doing  
16 that I was working at full capacity.  
17 Q. Yes. And what was Mr Giladi's response to you about  
18 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.

65

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.  
5 Q. And ultimately, you left this area of your work because  
6 of the overwhelming nature of it?  
7 A. That's a fair assumption, sir, yes, I did. I did.  
8 Q. Thank you.  
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.  
13 Can I just deal with the issue of version 5 and  
14 version 2, so the Giladi final version of the SOP 47 and  
15 the new Whittle document of 4 May, Mr Whittle's new  
16 document. There is a difference of understanding  
17 between you and Mr Whittle about what the role of  
18 version 2 was; is that fair?  
19 A. Yes, that is a fair assumption, certainly from his  
20 evidence yesterday.  
21 Q. So your instruction to him was to use the national  
22 guidance to rewrite the middle tier policy, the regional  
23 policy, but to then make that supersede not only the  
24 regional policy but also the version 5? So that was  
25 your intention at the time. Do you agree that it's

66

1 imperative that the person who tasks such a review and  
2 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  
12 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  
24 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.

67

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.  
6 Q. And you've referred to there being an ambiguity, 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}.  
12 You have seen this recently, you've had a chance of  
13 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 longer applied, I think I'm right in saying that there  
17 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

68

1 trying to be too critical , I'm just trying to establish  
 2 the facts as would be known to the other commanders.  
 3 Looking at that email now, and the fact that  
 4 version 5 is not mentioned at all and the fact that the  
 5 version 2 document attached is marked "draft", it's not  
 6 a matter of ambiguity, is it , Mr Lear? It's just simply  
 7 the commanders would have no idea that version 2 was  
 8 replacing version 1.10 and version 5, and that was the  
 9 one that they were to follow?  
 10 A. In my head (overspeaking) -- sorry.  
 11 Q. You answer, officer, please.  
 12 A. In my head, sir, I'd sent this email out and -- I don't  
 13 know, I can't explain it, I've reflected so much on this  
 14 particular email. For me, it will also provide the  
 15 opportunity for commanders and advisers to consider and  
 16 discuss the revised da da da policies which are there.  
 17 For me it was done, and I fully admit that if I was  
 18 going back with hindsight, with what I know now, I would  
 19 be as clear as I could be. If it raised ambiguity or  
 20 people didn't understand, nobody got back in touch with  
 21 me. I'm not using that as an excuse, but I'm just being  
 22 as (inaudible: distorted) as I can be. The only time  
 23 this was brought to my attention that it could have  
 24 caused ambiguity, or however we want to phrase, it was  
 25 last year when I had to write a statement. So for 3 or

1 4 years in my head it did its purpose, but obviously  
 2 not ...  
 3 Q. Sure. But this could be an email that the recipients  
 4 read and effectively treated it as a consultation: this  
 5 is what we're going to discuss, this is a draft policy?  
 6 It doesn't state that this is the policy that you must  
 7 apply from today, 12 May, does it?  
 8 A. No, sir, and that's what I'm saying. If I had the  
 9 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?  
 13 Turning back to version 5 for a moment, can you help  
 14 us with whether in fact version 5 was itself actually  
 15 approved? You've told us that you weren't asked about  
 16 version 5, that Mr Giladi undertook that revision  
 17 himself. But can you help us with whether it actually  
 18 was approved?  
 19 A. For me, sir, Mr Giladi is the person who approves it, so  
 20 he would have sent it to me as a read document. The  
 21 normal scheme of things would have been for me to get  
 22 somebody to approve it -- sorry, review it and for me to  
 23 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.

1 Q. So you assumed that because it had come straight from  
 2 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  
 9 you? This is the email or this is an email trail that  
 10 relates to the NaCTSO guidance coming through following  
 11 the Westminster Bridge attack in March 2017, which led  
 12 to the revision of the GMP Plato policy that we're  
 13 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  
 16 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  
 20 what the extant, the existing Plato policies at GMP were  
 21 at the time; is that right?  
 22 A. That's correct, sir, yes.  
 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  
 25 Policing Collaboration version 1.4, which had attached

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  
 8 there which was relevant about the back--to--back channels  
 9 and the hailing channels when host forces come in.  
 10 I think, and as I say I don't know, this is all  
 11 assumption and surmise, I believe that that is the  
 12 policy that she needs to update for comms.  
 13 Q. Right. Well, whatever the position of what her role was  
 14 in updating it, correct me if I'm wrong, but the thread  
 15 appears to be whatever her task was, it appears to have  
 16 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  
 22 reference to "the intranet site/force policy/firearms  
 23 policy". And it appears that the SOP 47 version 5  
 24 simply hasn't been found on this search.  
 25 A. I'm not interpreting it that way, sir. I'm interpreting

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 document  
 10 down now, thank you very much, Mr Lopez.  
 11 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  
 14 had in fact approved it? Was it simply Mr Giladi?  
 15 A. Yes, sir. That's how I understand it.  
 16 Q. Can you help us then with what the process of approval  
 17 of these policies was within Greater Manchester Police  
 18 and the audit trail?  
 19 A. Normally, as I said, what we would normally do with  
 20 a policy, be it either on a yearly basis and/or if  
 21 something significant happened, then we would then  
 22 review our policy. What would normally happen is  
 23 somebody who works for me would normally review them,  
 24 send them to me, and I would send them to the head of  
 25 firearms, for GMP that was obviously Mr Giladi, for the

1 purpose of his approval and he would return them back 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  
 14 a policy and send it to me back.  
 15 Q. Right. Is that process written down anywhere? Is there  
 16 a ---  
 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  
 19 earlier question, how could we in fact know that  
 20 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.  
 24 Q. Moving on to version 2, Mr Whittle's document. He  
 25 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  
 2 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?  
 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  
 13 the Whittle document was in fact approved, but there is  
 14 in fact no evidence that it was approved. You've not  
 15 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  
 22 of lethal force, there should be no doubt as to whether  
 23 it has been approved?  
 24 A. I agree, sir, yes.  
 25 Q. And there should be an audit trail that you and

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  
 5 actually in force?  
 6 A. Yes, sir.  
 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 saying, yes.  
 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  
 15 find anything that's come back down the chain.  
 16 Q. So a commander who is looking for which policy was in  
 17 force might find version 5, for example, but there'd be  
 18 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  
 23 things that ought to be documented is that where a new  
 24 policy or a rewritten policy supersedes another policy,  
 25 so here version 2 supersedes version 5 amongst other

1 things —  
 2 A. Yes.  
 3 Q. — there should be a clear means of operational  
 4 commanders being able to see that version 5 is no longer  
 5 in force?  
 6 A. Yes, I agree, sir. Version 5 would have been taken off  
 7 the intranet site.  
 8 Q. Again, is there any — do we know that? Is there any  
 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  
 21 recognised process within Greater Manchester Police as  
 22 to how a newly approved policy is rolled out?  
 23 A. No, sir.  
 24 Q. There's no document we can go to and see a process as to  
 25 how a new policy is rolled out?

77

1 A. Not that I'm aware of, sir.  
 2 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  
 4 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,  
 20 but requiring an amendment to a policy, or where there  
 21 was a rewrite which added substantially or not to an  
 22 existing policy, or when there was a completely new  
 23 policy, effectively it was down to your judgement in the  
 24 very limited time you had as to how you rolled it out?  
 25 A. Correct, sir, yes.

78

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?  
 4 A. That's correct, yes.  
 5 Q. Under that process, if I can call it that, the only way  
 6 that officers would know about the start date for the  
 7 new version or the new policy would be (a) if they were  
 8 a recipient to that email?  
 9 A. Correct.  
 10 Q. And (b) if the email contained a clear reference to the  
 11 start date?  
 12 A. That's right, sir, yes.  
 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  
 16 process when a new or substantially changed policy was  
 17 rolled out for how it was to be trained?  
 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  
 23 regionals' training and that would be what we delivered.  
 24 Q. So there would be an audit trail for that?  
 25 A. Yes, there would be.

79

1 Q. Okay. Let's, if I may, drill down into that a little  
 2 more. When we are looking at SOP 47 version 5, ie GMP  
 3 policy, when Mr Giladi reviewed and rewrote SOP 47,  
 4 should there be an audit trail for how that was trained?  
 5 A. That would have only taken part in the command training,  
 6 so the email like what I sent out, it would have formed  
 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,  
 20 do you know?  
 21 A. Certainly not by me, sir, no.  
 22 Q. So it may or may not have been circulated on an email  
 23 similar to your 12 May one?  
 24 A. Possibly, but it didn't come from my office. If  
 25 Mr Giladi's done it, I don't know...

80

1 Q. It didn't come from your office. Did you see any such  
2 email --  
3 A. No.  
4 Q. -- rolling it out?  
5 A. Not from memory, sir.  
6 Q. No doubt somebody can check that. But once that was  
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.  
14 Q. And you're not aware whether any changes within  
15 version 5 were trained?  
16 A. I don't know what the versions were -- the differences  
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  
21 training on it prior to 22 May.  
22 A. No, sir, no.  
23 Q. And in fact, I think again in your statement you fairly  
24 concede that in fact, given the extent of it, it's quite  
25 likely the recipients may not have read it before

81

1 22 May.  
2 A. That's a distinct possibility. If you were to look at  
3 each document individually, each one is quite  
4 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 you've  
16 indicated in your statement, paragraph 25 of your first  
17 statement, that Mr Giladi prepared version 5 for the  
18 purposes of the HMIC review.  
19 A. Yes, sir.  
20 Q. Was it normal to review and amend a policy such as this  
21 prior to an HMIC review?  
22 A. I can't really comment. I've never been involved in  
23 an HMIC review.  
24 Q. I'll deal with the point swiftly. If you can't answer,  
25 please just say. That would mean that the Inspectorate

82

1 were reviewing policies which had not been operational;  
2 yes?  
3 A. Possibly, sir.  
4 Q. Yes. Shouldn't a review be of operational policies  
5 which have a history of being operated and then they can  
6 be improved in the light of HMIC review and feedback?  
7 SIR JOHN SAUNDERS: Mr Weatherby, I think I'm going to ask  
8 you to ask that of somebody else. The reason for  
9 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  
16 dated October of 2016.  
17 MR WEATHERBY: Yes. And likewise, I was going to ask  
18 whether HMIC had been supplied with the version 1.10  
19 document, but equally that's not a question for this  
20 witness.  
21 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  
23 checked.  
24 MR WEATHERBY: Yes, that would be useful.  
25 I just want to show you a document, I think I know

83

1 the answer, but I want to make it so that there's no  
2 room for doubt here. Your recollection is that nothing  
3 came back to you from the HMIC review; is that right?  
4 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.  
8 Q. Just for the avoidance of doubt, let me just refer to  
9 that. So yesterday you will have seen me put the  
10 handwritten debrief note from 3 or 4 November?  
11 A. Yes, sir.  
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.  
16 {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 it.  
20 Q. Okay. Just for the record, as I understand it, this is  
21 the HMIC more detailed feedback that was dated  
22 20 December 2016 -- that comes from the Opus heading --  
23 and that includes much more detailed feedback and the  
24 answer to questions that my team have not been able to  
25 find the questions, but this is the feedback that came

84

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  
 6 face.  
 7 Q. That's very helpful, but I shan't ask you about it  
 8 because you hadn't seen it until last Saturday. That's  
 9 just a measure of the stuff that would have been useful  
 10 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 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  
 16 that, then we would have reviewed it again. I did  
 17 ask the GMP solicitor when that arrived, and apparently  
 18 the document that we have in front of us arrived in,  
 19 I think it was, November or December 2017.  
 20 Q. Right. Well, in fact, the date we've got on it is  
 21 20 December 2016, so maybe that can be clarified by  
 22 somebody else.  
 23 Thank you very much, Mr Lopez, we can take that  
 24 down.  
 25 I was going to take you through some of that, but as

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  
 12 commanders, basically, so it's all firearms commanders.  
 13 So that's from the strategic firearms commander at the  
 14 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?  
 22 A. If I can bring you back slightly to the discussions that  
 23 we had almost at the beginning of my interview or  
 24 evidence. The way I understand it, Mr Giladi was the  
 25 central peg: I was going to deal with the SOP, for want

1 of a better word, communications was going to go to one  
 2 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  
 18 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 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  
 24 staff's responsibility, the EHCR(?), et cetera, and I do  
 25 think that could have been circulated.

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  
 3 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.  
 11 You may recall I was asking him about the different  
 12 roles from the FDO and the operational firearms  
 13 commander and the ground--assigned tactical firearms  
 14 commander and others from the --  
 15 A. Yes, sir.  
 16 Q. -- version 2 document; yes?  
 17 A. Yes, sir.  
 18 Q. In terms of the operational firearms commander, the  
 19 version 2 indicates that he or she is to remain at the  
 20 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 take part in the actual confrontation or search for 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  
 5 there could be multiple, two, three, four OFCs, and  
 6 that's a rule. The purpose of it is so a firearms  
 7 commander can actively engage with the joint  
 8 decision-making.  
 9 Q. Yes. Okay, if there was more than one operational  
 10 firearms commander -- I don't think there was on 22 May,  
 11 but we'll come to that in due course -- but there would  
 12 be an operational firearms commander who would go to the  
 13 scene and go to the rendezvous point or the forward  
 14 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  
 18 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  
 22 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  
 25 determines where the forward command post should be?

1 A. I think it would be a discussion with the tri-parties  
 2 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  
 12 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  
 16 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 commander, as I understood Mr Whittle's evidence and  
 21 indeed the policy, the force duty officer, one of the  
 22 first tasks that he or she should undertake is to  
 23 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?

1 A. That's my understanding, yes.  
 2 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,  
 5 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  
 24 takes over from the FDO, whether that's at the  
 25 Counter-terrorism Police Operations Room, whether it's

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  
 11 on, in terms of the ground-assigned tactical firearms  
 12 commander, their role is set out, we don't need to look  
 13 at it at the moment, but just for the record it's set  
 14 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 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  
 24 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  
 5 environment, it's a firearms deployment and our sort of  
 6 like APP I think covers this. I think what it says  
 7 is that the TFC needs to speak to the SFC, obviously to  
 8 get the authority -- not rescinded, what's the other  
 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  
 13 in charge. If they need additional support, such as  
 14 they need a Silver commander, then they would request it  
 15 via the SFC whose responsibility it is to then send  
 16 somebody.  
 17 Now, it's a command protocol between those two  
 18 people, what they actually need, so it could well be the  
 19 TFC says, "I'm going this way, I'll deal with everything  
 20 over there, the armed assets, you deal with all the  
 21 unarmed staff that are coming". That could be one, but  
 22 it would be an agreement at the scene between those two  
 23 people. (Overspeaking). I was going to say, I wouldn't  
 24 see a -- "Okay, we're being deployed, so we  
 25 automatically need a Silver". I would think it would be

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.  
 6 Q. Right. So first and foremost, the ground--assigned  
 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 --  
 14 A. That's correct.  
 15 Q. But --  
 16 A. I'm sorry.  
 17 Q. Yes, so that first and foremost is the ground--assigned  
 18 tactical firearms commander's role. But if the incident  
 19 is relatively limited, then there may be a discussion  
 20 between the ground--assigned TFC and the strategic  
 21 firearms commander --  
 22 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

1 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  
 5 they are our eyes and ears. So it would be definitely  
 6 the TFC's responsibility to take control of those  
 7 officers, I would suggest.  
 8 Q. Right, okay. Would you agree with me that the policy in  
 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 Stay 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.  
 19 Q. You tell me otherwise, but it doesn't appear to be clear  
 20 whether there should be an unarmed Silver at the scene  
 21 as well as a ground (overspeaking).  
 22 A. That's not how I would see it. I would see it as the  
 23 TFC is the commander at the ground and if he needs  
 24 additional support from a ground--assigned Silver, then  
 25 he can request it and it would be provided.

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  
 4 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  
 20 the commander training in early 2017. We've asked  
 21 Mr Whittle a lot of questions about this, so I won't  
 22 duplicate those questions. But this was commander  
 23 training which was set up between the three services,  
 24 Mr Gaskell from GMFRS, NWS 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 you?  
 6 A. No, sir, I came as support to the actual event.  
 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, sir.  
 10 Q. Okay. Can I just put a document up, which is very  
 11 simple, I'm sure you've seen it. {INQ019054/1}.  
 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 number 1:  
 18 "Development of hard-wired system between all three  
 19 command centres."  
 20 A. Yes.  
 21 Q. Am I right to read that out of this training day an  
 22 action point that you and Mr Gaskell took ownership of  
 23 was to develop a dedicated system between the three  
 24 command centres to ensure during a Plato incident the  
 25 FDO had a ready means of tri-service communication?

1 Is that right?  
 2 A. The way I understand that, sir, is the development of  
 3 the █ channel.  
 4 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  
 6 which Ms Hoyte was --  
 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 channels.  
 11 MR WEATHERBY: Indeed.  
 12 Whatever channel, this is talking about the  
 13 development of a dedicated means of tri-service  
 14 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?  
 20 A. I believe so, sir, yes. I believe so.  
 21 Q. Okay. Point number 5:  
 22 "Consider a GM-wide MTFA response plan (similar to  
 23 generic response plan). GMP already have some iconic  
 24 points identified. To liaise with GMFRS and NWAS."  
 25 A. I don't think so. I certainly can't remember doing any

1 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?  
 6 A. I can't recall, sir. I can't recall.  
 7 Q. The fifth point referring to something similar to the  
 8 generic response plan was trying to take forward  
 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. Okay. 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  
 24 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.  
 4 Thank you very much, Mr Lear, those are my  
 5 questions.  
 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.  
 17 SIR JOHN SAUNDERS: And he was saying the difficulty is that  
 18 the training times are set for the whole year when  
 19 people can do training.  
 20 A. I think what Mr Whittle was trying to articulate  
 21 yesterday is similar to the email which I sent out.  
 22 Each year commanders, firearms commanders, have to  
 23 attend two periods of training as a minimum set by the  
 24 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  
 2 during the year.  
 3 What Mr Whittle is saying is that is set in April,  
 4 at the beginning of each financial year, by the chief  
 5 firearms instructor and that's the training for the  
 6 commanders that year. So he was saying we couldn't do  
 7 additional training because it had not been set.  
 8 SIR JOHN SAUNDERS: So if a particular commander has done  
 9 his 6-hour training and his 3-hour training before the  
 10 January took place, within that financial year, he  
 11 wouldn't be permitted to do any more?  
 12 A. I think he would have been able to attend CPD, which is  
 13 basically a -- I think we could have done it. I think  
 14 we could have brought that in.  
 15 SIR JOHN SAUNDERS: Everyone recognises it's urgent, we need  
 16 to resolve it --  
 17 A. Yes.  
 18 SIR JOHN SAUNDERS: -- because we have a severe threat. It  
 19 just seems -- would it not be possible to say, "Never  
 20 mind those, you're all going on it"?  
 21 A. I think it would have been possible, sir, with  
 22 a strongly worded email from one of the more senior  
 23 officers than me.  
 24 SIR JOHN SAUNDERS: Thank you.  
 25 The other thing I asked Mr Whittle to do, and he was

101

1 going away to do, was he had been asked a lot about the  
 2 implementation of version 2. I asked him to go away and  
 3 say, actually, would it have made any difference to the  
 4 response on 22 May knowing, as we now do, or having some  
 5 idea of things which may have gone wrong on the night.  
 6 Again, if you want to go away and look at it and compare  
 7 the versions and then decide whether there was anything  
 8 which might have made a difference, by all means. But  
 9 off the top of your head?  
 10 A. Sir, can I be perfectly honest with you? When I left  
 11 the firearms environment I tried to stay away. I don't  
 12 actually know what happened on the night.  
 13 SIR JOHN SAUNDERS: That's fair enough. Thank you.  
 14 MR GREANEY: I have been in touch with Mr Horwell who does  
 15 not think his questions will last any longer than  
 16 10 minutes. It's rather better that we conclude them  
 17 before lunch and I've been told that's fine.  
 18 Questions from MR HORWELL  
 19 MR HORWELL: Mr Lear, just in relation to some questions  
 20 you've recently been asked, you were asked whose  
 21 responsibility was it or would it have been to set up  
 22 the FCP. I'm not going to ask for it to be put on the  
 23 screen, it will take a little time, but 4.8 of JOPs 3  
 24 states that:  
 25 "The police on-scene commander in consultation with

102

1 FRS and ambulance counterparts is responsible for  
 2 identifying a suitable FCP for specialist emergency  
 3 service personnel."  
 4 Which I think in large measure was the answer you  
 5 gave.  
 6 A. Thank you, sir.  
 7 Q. But one other matter in relation to a question you were  
 8 recently asked. You were referred to an email from  
 9 Jo Hoyte to Stephen Henderson, dated 29 March 2017.  
 10 This is a reference to whether or not there was an old  
 11 version of a firearms policy. This is something you  
 12 deal with in your statement and I'm just wondering  
 13 whether you can assist us.  
 14 In the email from Jo Hoyte she says:  
 15 "I notice that the copy on the ops planning  
 16 database..."  
 17 And when you deal with this in your second witness  
 18 statement, you refer to the intranet in which there  
 19 would be firearms folders. My first question, just so  
 20 that we are clear about this: the ops planning database  
 21 that Jo Hoyte referred to in the email and the intranet  
 22 firearms folders that you refer to in your witness  
 23 statement, the same database or two separate databases?  
 24 A. Two completely separate databases, sir. I'm responsible  
 25 for the firearms one and I believe the other database

103

1 was in the ops planning team, I believe.  
 2 Q. I hope this is perhaps the most obvious question that  
 3 has been asked so far, but the best place to search for  
 4 a firearms document would presumably be the firearms  
 5 folder?  
 6 A. I would also tend to take it one step further, sir,  
 7 insofar as if somebody was asking for a firearms policy  
 8 they could ask the Firearms Policy Unit.  
 9 Q. Right. You said at a much earlier stage in your  
 10 evidence that there would be an onus, and I am sorry,  
 11 I should have introduced the question a little more  
 12 clearly. This is the 12 May email, Mr Lear, to which  
 13 the three principal Plato documents were attached,  
 14 including in particular Mr Whittle's 4 May document.  
 15 When asked about that email, much earlier this  
 16 morning, you said that there would be an onus on the  
 17 individual to read the policies and would later be  
 18 tested on them in training.  
 19 A. That's right, yes.  
 20 Q. The 4 May document, the Whittle document, that had in  
 21 it, in colour, the changes to the predecessor?  
 22 A. It did, sir, yes.  
 23 Q. So anyone looking at that document could clearly see  
 24 what changes had been made.  
 25 A. That's right, yes.

104

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?  
6 A. I would, sir, but also if there was any confusion,  
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.  
16 SIR JOHN SAUNDERS: It had the benefit of showing the  
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.  
21 Sorry, Mr Horwell.  
22 MR HORWELL: Not at all, sir. The document — perhaps you  
23 can't answer this, Mr Lear, and I'm sure you understand,  
24 no one is asking you to guess, but the Whittle guidance,  
25 the 4 May guidance that would have been placed on the

105

1 intranet in the firearms folders, would that have been  
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  
9 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  
20 support from the control room for the FDO. The  
21 principle of an FDO delegating tasks, that would be  
22 commonly understood?  
23 A. I can't see how they could do it without delegating and  
24 I think that would be an accepted practice. That's what  
25 I think.

106

1 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.  
5 MR HORWELL: You've been asked a number of questions about  
6 resourcing of your department and the under-resourcing  
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  
11 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,  
20 tirelessly. And the investment also nationally with  
21 regard to the specialist units that we have access to as  
22 well.  
23 SIR JOHN SAUNDERS: Mr Horwell, since that came from me, can  
24 I make it clear it was not a suggestion, it was actually  
25 a question.

107

1 MR HORWELL: Sir, I didn't intend it otherwise, I promise  
2 you. I think others have suggested it. You asked the  
3 question. I certainly didn't intend to suggest  
4 otherwise, sir.  
5 Mr Lear, the training that took part in January and  
6 February of 2017. You dealt with this in your witness  
7 statement. It's clear that we are soon going to have  
8 some figures. But in terms of your recollection at the  
9 time you made your second witness statement, you said  
10 this, and I can take you to the passage, but it's  
11 a short one, so I'll read it. If you want to look at  
12 your witness statement, you will of course say so. This  
13 is paragraph 70 of your second witness statement:  
14 "My recollection is that there was a reasonable  
15 number of attendees from GMP at these sessions at  
16 Thompson Street, sufficient to ensure that we had  
17 a representative in each group for the discussion  
18 sessions, but I cannot remember who was there and did  
19 not make a list of attendees."  
20 You go on in your witness statement at paragraphs 71  
21 and 72 to deal with further training in April of that  
22 same year. I won't read the paragraph, it is there for  
23 all of us to see.  
24 There has been some evidence of, on occasions,  
25 failures by GMP police officers to attend training

108

1 sessions. Can you help the inquiry, please, as to the  
2 problems some police officers have with attending  
3 training sessions and the difference between their roles  
4 as firearms commanders, for example, and their normal  
5 day jobs, Mr Lear? Can you help us, please?

6 A. Well, I'll try a little bit, sir. The GMP firearms  
7 commanders, that's not just their full-time job, they  
8 actually do that as well as their normal role, so if  
9 they were divisional commanders, for example. Also  
10 because of who they are, they're quite senior in the  
11 organisation, so it's not, shall we say, beyond the  
12 realms of possibility for these people who are offered  
13 the training physically not to have the time to go, just  
14 basically because of day-to-day business.

15 Obviously in comparison to the mandatory training  
16 which we spoke to, the 6 hours and the 3 hours, there's  
17 no wriggle room for that one and they have to attend  
18 that one, otherwise they lose their status as a firearms  
19 commander.

20 MR HORWELL: Thank you, Mr Lear.

21 Sir, that is all I ask.

22 SIR JOHN SAUNDERS: Mr Horwell, would you stay on the line  
23 for a moment? I'm going to ask something and if  
24 I manage to confuse everybody, perhaps you can sort it  
25 out.

109

1 I am sorry about this. This is just the last thing.  
2 You were explaining to us the procedure of how it is  
3 meant to work about going to the forward command post.

4 A. Yes, sir.

5 SIR JOHN SAUNDERS: And what you said is everyone is  
6 directed to the rendezvous point and at the rendezvous  
7 point the three commanders of the three different  
8 services will get together.

9 A. Mm-hm.

10 SIR JOHN SAUNDERS: And will then agree a forward command  
11 post. Once there, they are then there to make joint  
12 decisions about what happens. It's the basis of joint  
13 working?

14 A. Definitely, sir, yes.

15 SIR JOHN SAUNDERS: What is meant to happen when they don't  
16 actually come to the rendezvous point together? Does it  
17 all break down? I think we're going to hear that  
18 actually there never was an occasion on 22 May when they  
19 all came to the same rendezvous point. So how do we get  
20 past that initial block?

21 A. It's very difficult, isn't it, sir? Because the three  
22 agencies need to discuss what the threat, harm and risk  
23 are. Obviously, the firearms officers are already  
24 deployed to that and that's one thing. But if the Fire,  
25 for example, don't know what the risk is, or the

110

1 Ambulance, then they don't know what -- as I think you  
2 explained yesterday -- the line of exploitation is.  
3 They don't know how far they can go and where it's safe  
4 to go to. Obviously there could well be a reasonable  
5 reason, if that's the right phraseology, of why the  
6 three parties can't physically come together but they  
7 need to have the discussion.

8 The important thing is the discussion about what the  
9 latest intelligence is, what's the threat, what are the  
10 different zones, how are we going to do it, are we going  
11 to extract, et cetera, et cetera.

12 SIR JOHN SAUNDERS: So if you can't meet for whatever  
13 reason -- and here we know the Fire Service didn't want  
14 to go to the Cathedral Car Park, they thought it was too  
15 close, so they went elsewhere. So if you can't meet, it  
16 makes the communication even more important. You have  
17 to have it otherwise the whole thing breaks down.

18 A. We might as well not bother turning up.

19 SIR JOHN SAUNDERS: Okay, thank you.

20 Mr Horwell, did you want to pursue that at all?

21 MR HORWELL: No, thank you, sir.

22 MR GREANEY: Sir, I have no questions, so that concludes the  
23 evidence of Inspector Lear.

24 SIR JOHN SAUNDERS: I'm very grateful. It has been a long  
25 session for you, I know, but we're very grateful for

111

1 your help.

2 A. Thank you.

3 MR GREANEY: Sir, 2.15?

4 SIR JOHN SAUNDERS: Why not?

5 MR GREANEY: Thank you.

6 (1.18 pm)

7 (The lunch adjournment)

8 (2.18 pm)

9 MS CARTWRIGHT: Good afternoon, sir. The gentleman in the  
10 witness box is Mr Henderson and I'll ask for him to be  
11 sworn in a moment.

12 Just to clarify at the outset, Mr Henderson has  
13 provided two witness statements but recently the inquiry  
14 has made a Rule 9 request to address specific areas, so  
15 the focus of this witness's evidence today will be in  
16 respect of what he can tell us about Operation Plato,  
17 touching upon some training issues, and then Resilience  
18 Direct. The other matters will await the outcome of the  
19 witness statement that's due from this witness in due  
20 course.

21 Having set that out, could I ask, please, for  
22 Mr Henderson to be sworn.

23 INSPECTOR STEPHEN HENDERSON (sworn)

24 Questions from MS CARTWRIGHT

25 MS CARTWRIGHT: Good afternoon. Could you tell the court

112

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  
 5 provided. Can I ask you first of all to turn behind  
 6 tab 1 where we should see there your statement dated  
 7 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 A. It is.  
 12 Q. More recently you provided a supplementary witness  
 13 statement to the inquiry. That statement should be  
 14 behind tab 2 and is dated 18 February of this year.  
 15 A. Yes, that's correct.  
 16 Q. Are the contents of that statement true to the best of  
 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  
 21 assisting us in terms of your employment with Greater  
 22 Manchester Police? Can you give us an overview about  
 23 when you first joined GMP and the various roles that  
 24 you have had in GMP, please?  
 25 A. I joined Greater Manchester Police back in May 1993,

113

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  
 4 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 yes.  
 12 Q. Thank you. You tell us in the witness statement that  
 13 that role was part of the specialist operations branch,  
 14 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?  
 20 A. Okay. There was a range of units within specialist  
 21 operations. They range from firearms, dogs, mounted to  
 22 planning. Part of that planning unit sat with  
 23 ourselves, which was the Civil Contingencies Resilience  
 24 Unit.  
 25 Q. Thank you. So in terms of emergency planning that would

114

1 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.  
 6 Q. Thank you. In mentioning the other staff, I think we're  
 7 going to come to -- was your line manager someone by the  
 8 name of Parker?  
 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 Q. 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 yesterday. But in terms of the -- who was the officer  
 20 that effectively had responsibility for the firearms  
 21 unit? We have heard reference to Leor Giladi.  
 22 A. Yes, Mr Giladi was superintendent over the firearms and  
 23 ourselves over at planning.  
 24 Q. So he would be responsible for firearms but also would  
 25 sit over your aspect of the team as well?

115

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  
 4 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  
 8 a police support staff and she was actually part of the  
 9 Civil Contingencies Unit as well. However, she  
 10 concentrated in the force command module and Airwaves  
 11 TAC.  
 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  
 20 hear their names, to know that they fall within your  
 21 emergency planning or civil contingencies?  
 22 A. Katrina Hughes. At that stage it was -- I think it was  
 23 Royle at that stage. And also Sarah Grimshaw.  
 24 Q. Thank you. So Mr Parker being your line manager but  
 25 Mr Giladi having responsibility for the portfolio?

116

1 A. Yes. And there was a part-time as well, Hannah Vaughan.  
 2 Q. Thank you. You tell us that your role at the time  
 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  
 6 events.  
 7 A. Yes, that's correct.  
 8 Q. And also you tell us it was also to support GMP with its  
 9 obligations under the Civil Contingencies Act of 2004.  
 10 A. Yes.  
 11 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 --  
 19 A. Yes.  
 20 Q. -- the Joint Emergency Service Interoperability  
 21 Programme and the Government's CONTEST strategy.  
 22 A. Yes, that's correct.  
 23 Q. You go on to tell us that on joining the branch or the  
 24 unit you attended a number of specialist training  
 25 courses at the Emergency Planning College in relation to

117

1 your role.  
 2 A. Yes, that's correct.  
 3 Q. And then you give us a number of lists of training  
 4 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 training 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  
 20 events that were relevant to your role.  
 21 A. That's correct.  
 22 Q. And you have used that knowledge and experience to  
 23 contribute to the development of the College of Policing  
 24 approved professional practice for civil emergencies?  
 25 A. Yes, that's correct.

118

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  
 6 plans, you're able to deliver the quality that you would  
 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 time.  
 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  
 20 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?  
 24 A. Yes, that's correct.  
 25 Q. So can you just assist us a little bit more to

119

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  
 4 section for firearms policies?  
 5 A. That would be set on a separate, probably secure, site  
 6 so that would sit under firearms policy. There would be  
 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  
 20 be occasions when they would sit on the emergency  
 21 operational planning database?  
 22 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  
 24 of that sit in relation to firearms on --  
 25 Q. We'll come on to deal with that plan in a moment. But

120

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?  
 5 Q. Particularly in relation to marauding terrorist firearms  
 6 attacks.  
 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 interoperability and emergency response, how would those  
 12 on the other side have knowledge about what was sitting  
 13 on the firearms side? How would that work?  
 14 A. It was possibly part of JESIP. There would have been  
 15 nice little inter-liaison officers that may have had  
 16 some access in relation to it, if there had been some  
 17 training in relation to firearms plans, et cetera.  
 18 Q. Perhaps we'll look at that a little more when we come to  
 19 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  
 22 statement was to assist the inquiry with clarification  
 23 about what was the operational -- the relevant GMP  
 24 Operation Plato plan that was in place in May 2017.  
 25 A. Yes.

121

1 Q. Perhaps if I can start by taking you to your second  
 2 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  
 13 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  
 17 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  
 24 risk assessments.  
 25 A. The intranet -- I would assume this is in relation to

122

1 the firearms. Firearms' intranet would be a GMP system  
 2 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  
 18 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,

123

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  
 10 a version I think that he himself authored.  
 11 A. Yes.  
 12 Q. Was there any discussion ever at any point prior to the  
 13 arena attack as to the need or that there should be  
 14 someone within your team that had an ability or  
 15 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  
 23 seen, and I'm not going to take you to it, JOPs 3 and  
 24 JESIP that specifically deals with Operation Plato but  
 25 also marauding terrorist firearms attacks. Why would it

124



1 not be for a department that had a key role for  
 2 emergency planning not to need to know what that  
 3 specific policy said to understand how all the pieces of  
 4 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.  
 11 In relation to this particular — I don't think  
 12 there would be any need for me or the team to have gone  
 13 through plan and reviewed that plan.  
 14 Q. Can I ask you, in answering that question, as you  
 15 referenced clearing, have you been made aware what the  
 16 security marking was on that SOP for firearms at the  
 17 relevant time?  
 18 A. Not at this stage I can't recall.  
 19 Q. It's just with answering it, you're referencing that  
 20 it's a protected document that would require someone to  
 21 have a level of clearance (overspeaking) is that based  
 22 on something you were told?  
 23 A. In relation to clearance, we would be able to see some  
 24 sensitive documents in relation to it. We may have  
 25 access in relation to seeing that plan, but as

125

1 I explained, it may be when we went to a seminar or  
 2 something in relation to it, there would be no need for  
 3 us to go in and to change it and to review it, if that  
 4 makes sense, and my understanding is we didn't have  
 5 access to that folder.  
 6 Q. Okay. And so the learned chairman's been hearing some  
 7 evidence about version control and when different  
 8 versions of the SOP within the firearms unit related to  
 9 Operation Plato changed and what was then the effective  
 10 policy. So just to be clear, your team would have  
 11 nothing to do with the monitoring or auditing of that?  
 12 A. That's correct.  
 13 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:  
 16 "[You] would not be familiar with the details of all  
 17 of the plans that you are responsible for in the  
 18 operational planning database, but when a new plan was  
 19 approved it would be generally uploaded to the planning  
 20 database having been signed and approved by the relevant  
 21 person. The appropriate level of sign-off would vary  
 22 depending on the type of plan it was."  
 23 A. Yes, that's correct.  
 24 Q. So in giving that detail within your witness statement,  
 25 you're not in any way referring to the firearms SOPs for

126

1 Operation Plato or MTFAs?  
 2 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:  
 13 "There would have been certain firearms-related  
 14 documents that might have featured on the planning  
 15 database but which would have been stored on the  
 16 firearms section of the intranet."  
 17 A. That's correct.  
 18 SIR JOHN SAUNDERS: I think you read that out incorrectly  
 19 without a not.  
 20 MS CARTWRIGHT: I do apologise. I will just read it again  
 21 just 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."

127

1 A. That's correct.  
 2 Q. So then can you help us with a little more detail as to  
 3 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  
 8 at the start, that operation planning database had  
 9 access to all members of staff in GMP.  
 10 Q. Thank you. The inquiry's heard some evidence about  
 11 policy documents that came from the North-west Armed  
 12 Policing Collaboration.  
 13 A. Yes.  
 14 Q. And I think the email we're going to look at at the  
 15 moment is referencing one of their documents, so can you  
 16 help us at all as to how those North-west Firearms  
 17 Collaboration documents, so the regional documents,  
 18 would find their way on to the planning unit database?  
 19 A. We would normally be sent them by the firearms unit or  
 20 somebody 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  
 23 have a system in place where we would review them on  
 24 a three-yearly basis, if not a yearly basis, depending  
 25 on the plan, but a lot of the times if it was an updated

128

1 plan, we would be hoping or expecting it to be sent  
 2 through to us.  
 3 Q. So when you reference "(inaudible: distorted) from the  
 4 firearms", is that the internal GMP firearms unit --  
 5 A. Yes.  
 6 Q. -- rather than the actual north-west collaboration?  
 7 A. That's correct.  
 8 Q. Again, what would the process be of monitoring those and  
 9 reviewing those policies that came from the regional  
 10 firearms collaboration?  
 11 A. Again, because they're a specialist type of plans,  
 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  
 14 or been able to check every plan in relation to what  
 15 went on.  
 16 Q. Can I ask you, was there -- sorry --  
 17 A. Sorry, to scrutinise each document or each plan that  
 18 went on our database.  
 19 Q. Was there at any point any thought within your mind as  
 20 to why it was that you could have the regional firearms  
 21 collaboration documents but you couldn't have the local,  
 22 the GMP firearms policies?  
 23 A. No, it didn't cross my mind at that time, no.  
 24 Q. So you have sought within your witness statement to  
 25 assist us as to what was the most recent version

129

1 approved by Greater Manchester Police at the time of the  
 2 attack of 22 May 2017. Perhaps to deal with this  
 3 evidence, if we could perhaps look at an email exchange.  
 4 Mr Lopez, please could you display {INQ016884/1}.  
 5 If you could expand the bottom of the page.  
 6 We can see at the bottom of that page, an email of  
 7 28 March 2017, which is from you, sent to Simon Wright  
 8 and Jo Hoyte. I think you've already identified  
 9 Jo Hoyte being within the North-west Counter-terrorism  
 10 Unit.  
 11 A. Yes.  
 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.  
 15 Q. Thank you. I think the inquiry has seen reference to  
 16 a version of the SOP 47, I think version 4, that was in  
 17 fact authored by a Simon Wright, whether it's the same  
 18 Simon Wright... If we can go over the page, Mr Lopez,  
 19 before dealing with the detail of your email  
 20 {INQ016884/2}.  
 21 We can see that there was, from Jo Hoyte, the email  
 22 that was circulating the guidance in respect of  
 23 Operation Plato, so national guidance, that was issued  
 24 in March 2017.  
 25 A. Yes, that's correct.

130

1 Q. We can then see:  
 2 "Please see attached."  
 3 This is an email of 28 March 2017 at 08.57:  
 4 "Please see attached revised Operation Plato initial  
 5 response contingency plan guidance, which was circulated  
 6 to North-west Counter-terrorism Unit Protect and Prepare  
 7 last week, Thursday, 23 March 2017. My understanding is  
 8 that firearms leads within your unit should already be  
 9 aware of the revised guidance."  
 10 Then it sets out:  
 11 "The document clearly states forces should ensure  
 12 that, as part of their planning process for an  
 13 Operation Plato incident, planners, commanders and  
 14 advisers are aware of this guidance and have considered  
 15 it in the context of their local force structures and  
 16 plans."  
 17 So if we move back to {INQ016884/1}, Mr Lopez.  
 18 We can see that you are then causing a query to  
 19 Simon Wright and Jo Hoyte, setting out, on 28 March at  
 20 7.13 in the evening:  
 21 "Hi, Simon, my understanding is that the" --  
 22 SIR JOHN SAUNDERS: I think we're on -- are we on the right  
 23 one?  
 24 MS CARTWRIGHT: Bottom of the page, Mr Lopez:  
 25 "My understanding is that before June Roby left she

131

1 reviewed Op Plato with yourself."  
 2 Pausing there for a moment, how did you have  
 3 knowledge that June Roby may have reviewed some  
 4 Operation Plato material?  
 5 A. I can't recall exactly, but I was aware that -- there  
 6 was something in the back of my mind that she'd been  
 7 involved in doing something with Simon about Op Plato.  
 8 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  
 20 to Simon Wright? What was the purpose of that?  
 21 A. I would say it was probably a little bit of a nudge to  
 22 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  
 24 included in the operational planning database?  
 25 Q. Thank you. There was some evidence given this morning

132

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  
 6 from Mr Lear, would it be fair to say that this is who  
 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 else you need from us?"  
 14 And then we can see that the response that was  
 15 received came from Jo Hoyte.  
 16 SIR JOHN SAUNDERS: If we can go to {INQ016884/1}.  
 17 MS CARTWRIGHT: We can see it's Jo Hoyte that responds  
 18 rather than Simon Wright, who confirms:  
 19 "Steve, I have just spoken to Simon Wright to obtain  
 20 the most up-to-date version of the GMP Plato plan. It's  
 21 accessible via the intranet site/force policy/firearms  
 22 policy. It's actually a north-west regional plan, copy  
 23 attached. I notice that the copy on the ops planning  
 24 database is an old version. Just thinking that you may  
 25 want to replace it with the revised version. I have had

133

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."  
 4 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,  
 7 please?  
 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.  
 20 Q. So then can you perhaps help us unpick your  
 21 understanding of this email, please. So would your  
 22 understanding be from this email trail that Jo Hoyte had  
 23 specifically spoken to the Firearms Policy Unit to  
 24 identify the relevant Operation Plato plan that was  
 25 working with GMP at that time?

134

1 A. Yes, that's correct.  
 2 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?  
 6 A. Yes, that's correct.  
 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  
 16 asked to find other than the GMP Operation Plato plan?  
 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?  
 21 A. Because she sent the initial email on, she's referenced  
 22 there that she spoke to Simon Wright, I would assume  
 23 she's had access to that document or Simon sent it to  
 24 her and then she sent it on to myself.  
 25 SIR JOHN SAUNDERS: Just so I understand, she is sending you

135

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

136

1 SIR JOHN SAUNDERS: Okay, fine.  
 2 MS CARTWRIGHT: That sat within --  
 3 SIR JOHN SAUNDERS: Right.  
 4 MS CARTWRIGHT: If we look at the document that we have,  
 5 where we can see that the attachment was version 1.4 of  
 6 the cross-boundary armed response vehicle capability,  
 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.  
 12 A. Yes.  
 13 Q. I think within that, there is appendix C as a separate  
 14 document that sits within it, but I think the relevant  
 15 one at the time was the version 1 point -- I hope I am  
 16 right in that and that it wasn't 1.9.  
 17 But certainly in terms of what that email exchange  
 18 that I took you to a moment ago is, this is what  
 19 firearms unit policy -- Mr Wright's indicated was the  
 20 operational policy within GMP at the time?  
 21 A. Yes, that's correct.  
 22 Q. So from -- your understanding is -- I think the  
 23 information you provided to the inquiry in your second  
 24 witness statement -- is -- that was your understanding  
 25 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.  
 5 Q. You go on to say in your witness statement:  
 6 "Although I cannot be sure which document was the  
 7 most recent document approved by GMP at the time of the  
 8 attack on 22 May 2017, I believe that the most recent  
 9 version available on the planning database at the time  
 10 of the attack on 22 May 2017 is likely to have been  
 11 a plan referred to as the regional SOP version 1.4."  
 12 Which is the document we just looked at together.  
 13 A. Yes, that's correct.  
 14 Q. I think you say this in your witness statement:  
 15 "I say this not only because of the contents of  
 16 Ms Hoyte's email of late March 2017 in which she  
 17 suggests that this was the most recent available version  
 18 on the planning database at that stage, but also because  
 19 I have recently tried to find out what was on the  
 20 planning database as at 22 May 2017. In doing so  
 21 I reviewed GMP's CLIO site relating to the bombing of  
 22 the Manchester Arena."  
 23 Pausing there for a minute, can you explain to the  
 24 chairman and to those that don't know what GMP's CLIO  
 25 site is, what that is and how it operates?

1 A. The CLIO site is best described as an incident  
 2 management and action site. It's date stamped where you  
 3 upload documents into it. Anybody in GMP can access  
 4 that site under CLIO as long as they've got authority to  
 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.  
 9 SIR JOHN SAUNDERS: Is it like HOLMES?  
 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  
 16 where she had accessed the regional SOP version 1.4.  
 17 A. That's correct.  
 18 Q. So can you just explain what you understand from having  
 19 seen that Rachel Allen also accessed that same document  
 20 on 23 May 2017? Can you explain what the relevance or  
 21 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  
 24 subsequently been loaded on to our CLIO site by  
 25 Rachel Allen at 02.39 hours on 23 May.

1 Q. I think you provided -- sir, I'm not going to take you  
 2 to the appendix to the witness statement where the  
 3 capture from CLIO has been retrieved and helpfully  
 4 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 A. I have.  
 11 Q. And I think you tell us you spoke to her on 15 February  
 12 of this year.  
 13 A. Yes.  
 14 Q. Can you deal with that discussion you had with her?  
 15 A. She informed me she did access version 1.4 as well as  
 16 other plans that she believed would have been beneficial  
 17 at the time of the incident. She does not recall  
 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  
 20 system, but she may have accessed the planning database  
 21 to obtain it.  
 22 Q. And perhaps just to deal with what you have said there,  
 23 she has accessed somewhere version 1.4 of the regional  
 24 guidance?  
 25 A. Yes, that's correct.

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  
 5 document sits within the CLIO actions for 23 May 2017?  
 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 A. Yes.  
 12 Q. Would that suggest to you also that that was the policy  
 13 that was available that was thought to be the  
 14 Operation Plato plan as of the time of the arena attack?  
 15 A. That's correct, on the operational planning database,  
 16 yes, I believe so.  
 17 SIR JOHN SAUNDERS: I just want to make sure that I'm  
 18 following the effect of all this and the relevance of  
 19 it.  
 20 It seems that at no time on this particular database  
 21 was the GMP's own Plato plan to be found.  
 22 MS CARTWRIGHT: Sir, I don't want to give evidence, but  
 23 I can't say what would have been there. But --  
 24 SIR JOHN SAUNDERS: Okay. We know that as well as the area  
 25 plan there was actually GMP's own plan.

141

1 A. Yes.  
 2 SIR JOHN SAUNDERS: SOP 47 version 5?  
 3 A. Yes. So I believe.  
 4 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  
 8 your database was the 1.4 cross-boundary?  
 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 --  
 12 SIR JOHN SAUNDERS: Why?  
 13 A. Because it wasn't -- there would be no electronic  
 14 signature as in -- because it was a living document, the  
 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  
 20 my understanding of our system.  
 21 SIR JOHN SAUNDERS: Right.  
 22 MS CARTWRIGHT: Can I ask then a further question in terms  
 23 of the ability now because plainly you've been able in  
 24 2021 to seek to identify what existed where, but is  
 25 there an audit function within the planning database so

142

1 you actually can see when a policy was entered into your  
 2 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  
 5 interrogation of what was on CLIO by way of  
 6 Operation Plato or regional, local, did you cause any  
 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 A. 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  
 19 you looked to identify if any other documents that  
 20 post-dated that 1.4 version do exist within CLIO?  
 21 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 it.  
 24 Q. Thank you. I think, just to be clear, the time when --  
 25 SIR JOHN SAUNDERS: That's not a good phrase.

143

1 MS CARTWRIGHT: Pardon?  
 2 SIR JOHN SAUNDERS: That's not a good phrase, "just to be  
 3 clear". Thank you.  
 4 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  
 17 intranet in the past, I am not aware of it."  
 18 A. That's correct.  
 19 Q. Have you spoken to anyone else within GMP to see if  
 20 those that understand the IT have looked to be able to  
 21 see if that can be captured?  
 22 A. I have spoken to people and they have advised me  
 23 in relation to this that's correct.  
 24 Q. Thank you. Then just to complete the Plato aspect of  
 25 your evidence today, please. You tell us that you're

144

1 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  
 9 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  
 13 repeat the question?  
 14 Q. In terms of saying that you were expecting that there  
 15 was likely to be some additional Operation Plato plan  
 16 because of JOPs 3, the new version, was that because of  
 17 your knowledge of it in the Civil Contingencies Unit but  
 18 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  
 22 had updated a document in early May 2017, but I do not  
 23 recall it."  
 24 A. That's correct.  
 25 Q. "It is possible that firearms documents such as SOP 47

145

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  
 10 you expect to find that on your database?  
 11 A. Sorry, without going back through the whole of  
 12 appendix C, it may well have been attached to 1.4, so it  
 13 could have been on our database, yes, but I'm not aware  
 14 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.

146

1 MS CARTWRIGHT: Just to complete the issue around  
 2 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  
 5 Constabulary and Fire and Rescue Services, and you say  
 6 this:  
 7 "To the best of my knowledge and belief I was not  
 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."  
 11 A. That's correct.  
 12 Q. And again, in terms of your role within the Civil  
 13 Contingencies and Resilience Unit, would you expect to  
 14 be made aware of comments made by the Inspectorate  
 15 relating to Operation Plato?  
 16 A. No, I wouldn't.  
 17 Q. Thank you.  
 18 Can I then move to the second topic to ask you  
 19 about, please, and that relates to your involvement in  
 20 JESIP training, in particular the MTFFA joint services  
 21 commander training in early 2017. Perhaps then just by  
 22 way of high-level summary first of all around your role  
 23 relating to JESIP training before we look, please, at  
 24 the email correspondence with Mr Whittle, what was your  
 25 role relating to JESIP training, please?

147

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  
 13 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.  
 21 A. Training for firearms would have sat within firearms  
 22 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.

148

1 Q. And again, which directorate about they sit within?  
 2 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  
 6 with in your second witness statement arises out of an  
 7 email that was provided and then some training that the  
 8 inquiry's looked at by reference to the commander  
 9 training from January and February of 2017. So could  
 10 I first of all take you to the email that you sent,  
 11 please, to Mr Whittle. It's, please, {INQ100059/1}.  
 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,  
 14 please, Mr Lopez, {INQ100059/2}. We can see that on  
 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,  
 21 why would Mr Whittle be providing to you copies of his  
 22 training?  
 23 A. I assume it was just to cast an eye over it. The main  
 24 other reason that he would have sent dates through and  
 25 also the round--up of the two--day JESIP casualty recovery

149

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,  
 4 et cetera.  
 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  
 20 commanders training was something that was an action  
 21 following on from Winchester Accord as being needed by  
 22 the commanders?  
 23 A. I can't recall if it was at the time, however I have  
 24 looked at documents since and it was on recommendation  
 25 tracker that's come through or in relation to this

150

1 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.  
 6 Q. So in terms of what you've looked at now, are you able  
 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:  
 11 "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  
 16 Incident (I appreciate that this is unlikely in a MTFA  
 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  
 20 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  
 24 command?  
 25 A. That's correct.

151

1 Q. "... TFC (support) to have access to these and could be  
 2 asked for. They are tested weekly."  
 3 Pausing there, so in terms of the Airwave support  
 4 and it being tested weekly, is that something just to  
 5 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?  
 13 A. I can't recall exactly where the METHANE or ETHANE came  
 14 in, but yeah, METHANE was a recognised acronym for  
 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."  
 20 A. Yes. That's again around making sure that they recorded  
 21 their rationale or decision--making.  
 22 Q. And again would it be fair to say that literally you --  
 23 in the knowledge that it's recording, that would become  
 24 almost your transcript of your thinking process without  
 25 needing to write down or record it?

152

1 A. That's correct.  
 2 Q. Then you list then:  
 3 " ... a number of common issues that have been  
 4 highlighted national (sic) (I appreciate they don't all  
 5 relate to an MTFA incident)."  
 6 And we'll just look at what you brought to  
 7 Mr Whittle's attention.  
 8 But what was your reasoning for giving a sort of  
 9 shopping list of issues that have been identified by way  
 10 of joint organisational learning?  
 11 A. It was basically the best opportunity that we could --  
 12 at any time is to put out this learning into a training  
 13 or in an environment where other people may take these  
 14 points and learn from the points.  
 15 Q. So in providing the list of items that we're going to  
 16 look at together briefly, was the hope that that would  
 17 figure -- feed into the training that was going to be  
 18 delivered, the commander training?  
 19 A. Yes, that's correct.  
 20 Q. In terms of learning to ensure, moving forward, that the  
 21 same issues don't reappear?  
 22 A. Yes, that's correct.  
 23 Q. And can I ask then in terms of the bullet points we're  
 24 going to look at where would you have got that list to  
 25 identify the pointers that you had?

153

1 A. I believe it was a seminar I attended earlier, I think  
 2 it may have been in October 2016, where they had been  
 3 raised as key points from joint organisational learning.  
 4 Q. Thank you. Perhaps if we look at the list of items you  
 5 identified as common issues being reported through joint  
 6 organisational learning:  
 7 "Issues with identification of commanders -- use of  
 8 tabards.  
 9 "Lack of communication between commanders (sometimes  
 10 despite co-locating).  
 11 "Not establishing a forward command post.  
 12 "Lack of awareness of JESIP and M/ETHANE among first  
 13 responder staff resulting in delays with response and no  
 14 FCP set up.  
 15 "Not using M/ETHANE, so passing of incident  
 16 information ineffective and delayed.  
 17 "Major incident declaration -- evidence of not  
 18 declaring soon enough is delaying response.  
 19 "Issues with each service deploying tactical  
 20 commanders differently resulting in confusion around  
 21 tactical coordinating groups.  
 22 "Risks not shared with organisations arriving on  
 23 scene so staff placed in danger.  
 24 "Not using Airwave handsets/Talk Groups with mobile  
 25 phones being the default option therefore poor reception

154

1 is cited as a reason for poor communication between  
 2 staff."  
 3 And then -- I am going to ignore the media plan:  
 4 "Acronym use still an issue leading to  
 5 misunderstanding of information shared at scene and  
 6 control rooms.  
 7 "Hope this helps."  
 8 Can I ask you then, in terms of that list the  
 9 chairman's seen and we've looked at, that one of the  
 10 learning or one of the issues identified from  
 11 Winchester Accord and also from another training  
 12 exercise was the overloading of the FDO as part of  
 13 training exercises having been identified. Would there  
 14 be any reason why you wouldn't have included that within  
 15 the list of items for drawing to Mr Whittle's attention?  
 16 A. Not in relation to this. This would have been a direct  
 17 lift possibly from the joint operational learning and  
 18 the key points that they had brought out nationally.  
 19 SIR JOHN SAUNDERS: So should I imply from that that  
 20 nationally as a whole, unlike GMP, the overloading of  
 21 the FDO was not regarded as a problem?  
 22 A. I can't comment on that, that's not in relation to what  
 23 came out from joint organisational learning at this  
 24 stage.  
 25 MS CARTWRIGHT: Thank you. Can I ask you -- as we can see,

155

1 this is an opportunity for you to give key learning to  
 2 Mr Whittle to inform training that he was party to  
 3 organising. I'm not going to take you to the  
 4 PowerPoints, the chairman has seen the two versions,  
 5 I think, of the PowerPoints with Mr Whittle and  
 6 certainly you have reviewed both of those in preparing  
 7 for today and can't definitively say which one it was or  
 8 even whether there was a different document you  
 9 reviewed. Is that fair comment?  
 10 A. That's correct.  
 11 Q. So I'm not going to take you into the detail of those.  
 12 But how else would the learning from training events  
 13 such as Winchester Accord be then fed into the firearms  
 14 unit other than emails like this?  
 15 A. I assume that it would come through a debrief or  
 16 firearms -- Winchester Accord firearms training would  
 17 have been involved in actually planning the delivery of  
 18 the exercise.  
 19 SIR JOHN SAUNDERS: You went to a conference at which the  
 20 joint organisational learning told you what their  
 21 results were from looking all over the country at any  
 22 problems that there may be.  
 23 A. Yes.  
 24 SIR JOHN SAUNDERS: Leaving this aside, what did you do with  
 25 that information that you gained?

156



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

157

1 you?"  
 2 And his answer was:  
 3 "I think it would be events planning. They're the  
 4 ones who I think organised those meetings. Without  
 5 throwing anyone under the bus, I think Mr Henderson,  
 6 who's on this afternoon, might be able to answer that  
 7 question a little bit better."  
 8 So you've not been thrown under the bus, but I think  
 9 you've been placed in its pathway. So can you assist us  
 10 a little bit more about clarification of that area that  
 11 Mr Lear said you could help us with?  
 12 A. To the best of my knowledge, two things. One, with  
 13 Winchester Accord, firearms training would have been  
 14 involved in actual planning, I would say, of the actual  
 15 operation because it involved firearms. So feedback  
 16 would have and should have come through that.  
 17 In relation to the actual debrief itself, there  
 18 would have been a number of recommendations that would  
 19 have come out of that debrief and I can't recollect if  
 20 anything in particular related to the firearms, but  
 21 information should have been fed back in relation to  
 22 that.  
 23 And also Mr Giladi, who was our superintendent,  
 24 would have been aware of some of the recommendations  
 25 that came out of Winchester Accord and, I would have

158

1 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 —  
 4 SIR JOHN SAUNDERS: Sorry, was it your job to feed it back  
 5 as Mr Lear was indicating?  
 6 A. If it was involved in the recommendations and there was  
 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?  
 16 A. She planned, and I don't want again to use that word,  
 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  
 20 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.  
 24 SIR JOHN SAUNDERS: So you would expect that planner from  
 25 firearms to be feeding the —

159

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.  
 4 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.  
 20 MS CARTWRIGHT: We can see that this is the minutes from the  
 21 Major Incident, Public Order and Events Group meeting on  
 22 Wednesday, 7 July 2016. We know that Winchester Accord  
 23 had taken place over, I think, 9 to 11 May of that year.  
 24 And by way of attendees at this meeting we can see  
 25 Superintendent Giladi, operational planning section, was

160

1 present, as well as you, at that meeting.  
 2 A. That's correct.  
 3 Q. And again in terms of Mr Giladi, you've already told us  
 4 he had responsibility in respect of your Civil  
 5 Contingencies Resilience Unit but also an oversight role  
 6 for the firearms unit?  
 7 A. I think he did as well.  
 8 Q. Thank you. Perhaps then, if we could, having identified  
 9 that document, please, Mr Lopez, if we can move to  
 10 {INQ007615/3}. We can see:  
 11 "5. Exercising and testing/emergency planning."  
 12 If we can expand, please, the paragraph 17, please.  
 13 We can see that Sergeant Henderson gave a brief update,  
 14 that you circulated a copy of the recommendations that  
 15 had arisen out of Winchester Accord for perusal, which  
 16 was the appendix 8 of this document. And you gave  
 17 a brief rundown of the various aspects that each  
 18 recommendation covered. And we can see -- I'm not going  
 19 to take you through all the list -- that significantly  
 20 at paragraph 7 you gave the update that the exercise had  
 21 been --  
 22 SIR JOHN SAUNDERS: We're not actually looking at  
 23 paragraph 7.  
 24 MS CARTWRIGHT: 17, sorry. It's my fault, I do apologise.  
 25 Paragraph 17:

161

1 "The exercise had been run specifically to test  
 2 whether the FDO could work in isolation and it had been  
 3 established that this did not work. Some work has  
 4 already been done in relation to potentially bringing  
 5 radio operators from [redacted] to the force  
 6 headquarters."  
 7 So in terms of issues with the FDO and overloading,  
 8 would it be fair to say that you gave that summary  
 9 at the meeting at which Mr Giladi was present?  
 10 A. That's correct.  
 11 Q. And then in addition if we just move, please, just to  
 12 identify the appendix A at the back of that document  
 13 from page 9, please {INQ007615/9}. We see there the  
 14 debrief report from Winchester Accord is that appendix A  
 15 in the top right-hand corner. And again if we look,  
 16 please, at {INQ007615/14}, if we could expand  
 17 paragraph 17, please. We can see there:  
 18 "Additional support for the FDO would have helped  
 19 and would be necessary in the event of a real incident."  
 20 Was something that was one of the recommendations  
 21 with the owner of that recommendation being  
 22 Chief Inspector Mike Booth.  
 23 A. That's correct.  
 24 SIR JOHN SAUNDERS: Would it be possible to just run through  
 25 these recommendations, all of them, just very briefly?

162

1 MS CARTWRIGHT: Of course.  
 2 If we can go to {INQ00761/13}, please. We saw in  
 3 the minutes you gave a summary, but if we just work  
 4 through each of the recommendations, please, we can see  
 5 recommendation 1:  
 6 "Need more training in how the information should  
 7 flow through Gold and Silver. Ensure the two command  
 8 areas are kept separate in the FCM."  
 9 And can you just confirm FCM?  
 10 A. Force command module.  
 11 Q. And in terms of what -- the force command module, is  
 12 that effectively the physical space where people are  
 13 located?  
 14 A. Yes. There's in theory three force command modules on  
 15 the third floor at headquarters.  
 16 Q. And then we can see the owner for that action was  
 17 Inspector Roby.  
 18 A. That's correct.  
 19 Q. And there was going to be training sessions. Then  
 20 recommendation 2:  
 21 "Officers need training in the Gold control roles  
 22 and need to understand how Gold control Works. Suggest  
 23 a cadre of trained officers."  
 24 Again for Inspector June Roby to own that.  
 25 A. That's correct.

163

1 Q. Thirdly:  
 2 "Ensure that key support roles are staffed during  
 3 future exercises, such as IT support and a press  
 4 officer."  
 5 Again for June Roby. Recommendation 4:  
 6 "JESIP training needed for officers and commanders."  
 7 Inspector Anthony Hughes was to action that. Can  
 8 you assist: where did Inspector Anthony Hughes -- which  
 9 team did he sit within?  
 10 A. He sat within training.  
 11 Q. And thank you. Recommendation 5:  
 12 "More training required for [force control  
 13 module]/SCC..."  
 14 Again just SCC, please?  
 15 A. Strategic coordination centre.  
 16 Q. So again that physical space?  
 17 A. Yes.  
 18 Q. "... IT systems, ensure adequate IT available in correct  
 19 locations."  
 20 That being for June Roby. Then recommendation 6:  
 21 "Ensure adequate Silver cell staff to cope with  
 22 scenario for future exercises."  
 23 SIR JOHN SAUNDERS: I don't think we need to read 7.  
 24 MS CARTWRIGHT: 8:  
 25 "Need to look at the knowledge and briefing cell and

164

1 how CTU link in and share intelligence with the SCC."  
 2 9:  
 3 ""Phone list for exercises needs to be by role not  
 4 by name" --  
 5 SIR JOHN SAUNDERS: I don't think we need that one either  
 6 sorry.  
 7 MS CARTWRIGHT: 10:  
 8 "Ensure regular updates sitreps to FCP..."  
 9 Can you explain that, please?  
 10 A. It's updates to -- I would say it's forward control  
 11 point or post.  
 12 Q. And again just in terms of a sitrep, that is obviously a  
 13 summary, is that a situational awareness?  
 14 A. Yes, a situational awareness correct.  
 15 Q. "... from Silver and vice versa."  
 16 A. Yes, that's correct.  
 17 Q. 11 --  
 18 SIR JOHN SAUNDERS: I don't think we need that.  
 19 MS CARTWRIGHT: No. 12:  
 20 "Review activation processes. Are key roles getting  
 21 activated in the correct order?"  
 22 Do you see that?  
 23 A. Sorry, it just flicked off the screen.  
 24 Q. Sorry, I do apologise. Recommendation 12:  
 25 "Review activation processes. Are key roles getting

165

1 activated in the correct order?"  
 2 A. That again is part of the command module.  
 3 Q. 13:  
 4 "Review comms capability at the [training venue].  
 5 Is there a solution to black spots/loss of signal?"  
 6 14:  
 7 "Have a police liaison at the FCP to coordinate and  
 8 communicate with partners."  
 9 15:  
 10 "All points within the 'Areas That Went Well' table  
 11 are recognised as good practice and should be continued  
 12 in future exercises/incidents."  
 13 16:  
 14 "Continue to nurture and grow relationships between  
 15 partner agencies in the GM area."  
 16 Again, was that to ensure interoperability?  
 17 A. Yes, that's correct.  
 18 Q. Again that was for June Roby.  
 19 Then there is 17, the recommendation we've already  
 20 identified.  
 21 18:  
 22 "Devise a template that can be given to partner  
 23 agencies to note details of their C&C..."  
 24 Is that command and control?  
 25 A. Yes.

166

1 Q. "... which can then be scanned and put on CLIO."  
 2 Can you assist us as to that recommendation, please?  
 3 A. Again, it is when the partners come in to the FCM or if  
 4 there was and SCC, which is the strategic coordination  
 5 centre, then their details could be uploaded quite  
 6 quickly and they could have access to the CLIO system.  
 7 Q. And then recommendation 19:  
 8 "A contingency planner tactical adviser would be  
 9 beneficial if one could be available."  
 10 And that's for June Roby.  
 11 SIR JOHN SAUNDERS: Thank you.  
 12 MS CARTWRIGHT: Again then in terms of the matter raised by  
 13 Mr Lear about the learning from training exercises with  
 14 Mr Giladi being present at this meeting, how would you  
 15 expect them -- would you expect that that would then be  
 16 disseminated and shared, the relevant recommendations,  
 17 with the individuals within his team that would be  
 18 in that capacity?  
 19 A. Yes, that's correct.  
 20 Q. I'm conscious we've been going for an hour and 15.  
 21 We can continue but I don't know whether that's an  
 22 appropriate time to take a short break.  
 23 SIR JOHN SAUNDERS: We'll take a quarter of an hour.  
 24 (3.28 pm)  
 25 (A short break)

167

1 (3.48 pm)  
 2 MS CARTWRIGHT: Mr Henderson, I next want to deal with the  
 3 final area, but it will span a little bit of time,  
 4 relating to Resilience Direct. Perhaps if we could just  
 5 identify, you provided your first witness statement to  
 6 directly respond to the policing expert report where  
 7 they had dealt with aspects of Resilience Direct.  
 8 A. That's correct.  
 9 Q. Perhaps if we could first of all identify what  
 10 Resilience Direct is. Was Resilience Direct identified  
 11 and brought into force from April of 2014 by way of the  
 12 Cabinet Office initiative that had been identified  
 13 following the floodings in 2007?  
 14 A. That's correct.  
 15 Q. And perhaps, is it right to summarise that  
 16 Resilience Direct --  
 17 SIR JOHN SAUNDERS: Brought into force in April 2014?  
 18 MS CARTWRIGHT: April 2014 but it had been identified from  
 19 (overspeaking) 2007, yes.  
 20 Is it right that Resilience Direct is an online  
 21 private network that enables civil protection  
 22 practitioners to work together across geographical and  
 23 organisational boundaries for preparation, response and  
 24 recovery phases of an event or emergency?  
 25 A. That's correct.

168

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  
 6 and ensure that action is coordinated?  
 7 A. That's correct.  
 8 Q. And that Resilience Direct as a tool helps organisations  
 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?  
 18 A. That's correct.  
 19 Q. So having identified what Resilience Direct was and the  
 20 fact that it was an initiative from the Cabinet Office,  
 21 can we just deal with, as of the time of the arena  
 22 attack in May 2017 it's right, isn't it, that whilst  
 23 there was some use of Resilience Direct by the  
 24 resilience forum and GMP in terms of storage of  
 25 documents, it was not a fully integrated system within

169

1 GMP?  
 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  
 4 what time those sitreps were sent out in  
 5 Resilience Direct.  
 6 Q. So your understanding is that during the arena attack,  
 7 Resilience Direct was used to send situational reps?  
 8 A. Yes.  
 9 Q. Okay. 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.  
 14 A. Yes.  
 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.  
 20 Q. Mr Lopez, if we could move to {INQ007536/5}, please.  
 21 We can see under action 36 at line 46, the action  
 22 following on from Winchester Accord was for GMP to sign  
 23 up to Resilience Direct and it would be an action for  
 24 your unit to take forward. It records next to it:  
 25 "Completed, protocol being developed."

170

1 A. That's correct.  
 2 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  
 6 in May 2016 the fact that the completed protocol being  
 7 developed if it's not completed by May of 2017?  
 8 A. I believe this was a living document in relation to the  
 9 updating of some of these recommendations. So I would  
 10 assume that that's been updated at a later date from  
 11 when initially the Winchester Accord recommendations  
 12 occurred.  
 13 SIR JOHN SAUNDERS: So you're saying that that update on the  
 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?  
 24 A. That's correct.  
 25 Q. And perhaps if we look at the debrief report that

171

1 followed on from Winchester Accord, which was  
 2 Exercise Triton, please. Mr Lopez, please, it's  
 3 {INQ012544/1}.  
 4 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 Q. 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?  
 14 A. As explained, Resilience Direct was around sharing  
 15 situational awareness and part of that would be — if,  
 16 for example, I think this example was in flooding, so  
 17 it would be able to take a picture in relation to the  
 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.  
 20 Q. So we move, then, to {INQ012544/5}, training issues.  
 21 We can see that there was reference to issues with CLIO,  
 22 the CLIO system, and then at item 2:  
 23 "The assistance of Resilience Direct Mapping."  
 24 But by way of training recommendations it says:  
 25 "This awareness needs to be raised with all partners

172

1 on the systems that will be used during an SCG and TCG."  
 2 Can you just confirm TCG?  
 3 A. Tactical coordinating group.  
 4 Q. And then we can see reference to CLIO, Resilience Direct  
 5 and Resilience Direct Mapping. So how at that time did  
 6 CLIO and Resilience Direct work alongside one another in  
 7 responding to an emergency?  
 8 A. As I pointed out, CLIO was our incident management and  
 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.  
 14 Q. So in terms of then -- who, in responding to an  
 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?  
 19 A. When they were at the force command module, yes, they  
 20 would have had access to the CLIO system by logging on  
 21 as part of duty coordinating centre plan.  
 22 Q. So they'd be able to get access to it physically at GMP?  
 23 A. Yes.  
 24 Q. But they couldn't access it remotely in the way you can  
 25 Resilience Direct?

173

1 A. No, unless you had access to GMP's systems, which could  
 2 be a laptop and dongle, et cetera, but no, without  
 3 access to GMP's systems, no.  
 4 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.  
 13 Q. But Resilience Direct is a tool introduced by the  
 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  
 17 function, could access the same information?  
 18 A. Yes, that's correct.  
 19 Q. So would you say that was actually a benefit of the  
 20 Resilience Direct over the CLIO system?  
 21 A. Yes, I would say it was some form of benefit, yes.  
 22 Q. Then perhaps if we turn over the page, please, to the  
 23 recommendation from Triton {INQ012544/6}. Under  
 24 response recommendations, please, item 2, we can see it  
 25 was specifically identified to:

174

1 "Develop the use of Resilience Direct and  
 2 Resilience Direct Mapping and communicate to  
 3 commanders"?  
 4 A. Sorry, which?  
 5 Q. Response recommendations item 2.  
 6 A. Yes.  
 7 Q. "Develop the use of Resilience Direct and  
 8 Resilience Direct Mapping and communicate to  
 9 commanders."  
 10 A. Yes.  
 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  
 13 that we get to May 2017 and there's still not the  
 14 protocol agreed by reference to the use of  
 15 Resilience Direct?  
 16 A. As I pointed out in my statement, GMP risk management or  
 17 risk manager had issues in relation to the security for  
 18 Resilience Direct. I think I inherited this workstream  
 19 around June 2016. There's a chain of emails you may  
 20 want to go to.  
 21 Q. Yes.  
 22 A. But we were allowed access to utilise the system using  
 23 Triton to test it. Following this exercise, we --  
 24 I approached and wrote a document, I believe it was my  
 25 document with others, to sign off that risk assessment

175

1 with ACC O'Hare at the time so that we could utilise  
 2 Resilience Direct within GMP or using GMP systems with  
 3 partners.  
 4 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 A. That's correct.  
 12 Q. 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  
 14 resistant to permitting GMP's systems to use  
 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  
 20 this in your own time, at {INQ034428/4-10} -- I am not  
 21 asking for this to be displayed -- we can see a chain of  
 22 emails from 9 February 2016 where I think in fact it was  
 23 the Department for Communities who were raising as to  
 24 why GMP weren't using Resilience Direct.  
 25 A. Yes.

176

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 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 to  
 9 us, I will do.  
 10 Q. And that they were also highlighting in the February of  
 11 2016 that both Home Office and CTPU -- is that the  
 12 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  
 16 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 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

177

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  
 10 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  
 16 to say that you'd had a meeting with Simon Ebbitt  
 17 yesterday regarding Resilience Direct and agreed the  
 18 following, and then that's referring to his earlier  
 19 email of 4 July where he sets out the use of the  
 20 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

178

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.  
 7 If we look at that document, please, at {INQ034395/1}.  
 8 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  
 19 delivered the training, as far as I'm aware.  
 20 Q. Thank you. If we turning over the page, Mr Lopez  
 21 {INQ034395/2}. We can see is the summary there of the  
 22 benefits of Resilience Direct, that it's a tool that  
 23 supports strategic collaboration between partners,  
 24 locally, regionally and within Central Government. And  
 25 then if we please move forward to {INQ034395/5}. We

179

1 then have screenshots for once you're in  
 2 Resilience Direct and I think it's right, isn't it, that  
 3 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  
 10 Resilience Direct individually?  
 11 A. Yes. It was in the document that -- one of the  
 12 documents that I sent through, but while we are  
 13 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.

180

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.  
 5 Q. Would it also be fair to say that actually for  
 6 Resilience Direct to work in the way it is intended,  
 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?  
 16 A. That's correct, and other agencies if required.  
 17 Q. Yes. Such as BTP?  
 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  
 23 top the status bar and that there was a section for  
 24 planning. So would that be where all the tri-service  
 25 agencies could store their planning documents --

181

1 A. That's correct.  
 2 Q. -- for the relevant risk assessments, plans --  
 3 A. Yes.  
 4 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.  
 14 Q. So just using this document, you mention that you have  
 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  
 20 possibly be in the response.  
 21 Q. And do you know who would have updated those into the  
 22 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

182

1 Resilience Direct including that mapping which makes it  
 2 absolutely clear where the incident is occurring.  
 3 A. Yes.  
 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  
 6 for commanders?  
 7 A. Yes, that's correct.  
 8 Q. But can you assist then as to why once that permission  
 9 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  
 22 perhaps it's -- it's {INQ034404/1}, please, Mr Lopez.  
 23 We see at page 1 there this is the information risk  
 24 acceptance document. Is that what Mr Ebbitt had  
 25 required for GMP to use Resilience Direct?

183

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  
 4 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.  
 13 Q. Perhaps then if we go over the page to {INQ034404/3} we  
 14 see ACC O'Hare has signed that risk assessment on  
 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  
 20 base, so that was involving partners as such and that  
 21 would have taken it to the Greater Manchester Resilience  
 22 Forum to have a protocol signed off and put in place.  
 23 Q. I think you tell us in your witness statement that  
 24 in November of 2016, in fact 2 November, your line  
 25 manager, Inspector Parker, explained to the

184

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  
 8 Resilience Direct?  
 9 A. Yes.  
 10 Q. So it was used as a tool to notify people of meetings?  
 11 A. Yes, that's correct.  
 12 Q. And I think you also would use it to store documents?  
 13 A. That's correct.  
 14 Q. But in terms of it being used in a protocol to be able  
 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  
 20 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?  
 23 A. Yes, that's correct. It would have been in  
 24 collaboration with other colleagues.  
 25 Q. Perhaps if we just look at that protocol, please.

185

1 {INQ034403/1}. There's reference to the protocol in  
 2 earlier minutes in the February of 2017, but in fact the  
 3 draft version wasn't in place until the May of 2017;  
 4 is that correct?  
 5 A. That's correct. I think my first draft copy may have  
 6 been in the January, but...  
 7 Q. And if we then perhaps look, please, at page 4, Mr Lopez  
 8 {INQ034404/4}. We can see within that protocol you  
 9 identify the benefits of Resilience Direct, that it's:  
 10 "A secure web-based platform for the resilience  
 11 community to share real time information and is used for  
 12 planning, response and recovery. Resilience Direct and  
 13 the applications within are accredited to official by  
 14 the planned government accreditator. This includes  
 15 anything marked as official sensitive as per the  
 16 Government's security classifications.  
 17 Resilience Direct helps to facilitate multi-agency  
 18 collaboration in many ways, including sharing emergency  
 19 plans among Local Resilience Forum members, sharing  
 20 situation reports and briefings during an emergency,  
 21 communicates situation reports to lead Government  
 22 departments."  
 23 And then perhaps if we look over the page,  
 24 {INQ034404/5}, we can see reference to the collaborate,  
 25 under section 2.1, and we can see that:

186

1 "The response area of Resilience Direct is set up  
 2 with a blank incident report template to allow immediate  
 3 use of the area should it be required for the response  
 4 to an incident. When a response page is created within  
 5 Resilience Direct, a default structure is created  
 6 including a calendar and briefings area which contains  
 7 templates for agency reports and situation reports."  
 8 So it was really envisaged that Resilience Direct  
 9 could be a key area for interoperability communication  
 10 in live time during an emergency situation; would that  
 11 be fair?  
 12 A. Yes.  
 13 Q. If I could take you to another document that you  
 14 provided, I think yesterday in fact, which I think you  
 15 provided to support how — the work you had been doing  
 16 with the resilience forum and within GMP as to how  
 17 Resilience Direct would operate in practice. It's  
 18 {INQ040445/1}.  
 19 If you could just assist us, first of all, in  
 20 identifying this document because it's not a document  
 21 that had been provided before yesterday, notwithstanding  
 22 that your witness statement had been provided to address  
 23 Resilience Direct and the experts' reports comments  
 24 about that.  
 25 A. Yes. I think in the expert report — sorry, what the

187

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  
 4 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 A. 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.  
 18 The policing experts say this — and sir, just for  
 19 those who wish to follow it, I don't want it up on the  
 20 screen, it's {INQ035309/1} and it is page 77  
 21 {INQ035309/77} of that document. I'm reading from  
 22 paragraph 3.26.14:  
 23 "Though an 8-month period may appear lengthy, the  
 24 Greater Manchester Resilience Forum strategy and work  
 25 programme of 2015 to 2017 did not indicate that

188



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.  
 14 MS CARTWRIGHT: I apologise.  
 15 SIR JOHN SAUNDERS: I know you're trying to get through the  
 16 material.  
 17 MS CARTWRIGHT: These are the minutes of the Resilience  
 18 Development Group of 15 May 2017.  
 19 A. Yes.  
 20 Q. If we move to {INQ012448/3}, please, Mr Lopez, perhaps  
 21 just expand over item 5, please, and the  
 22 Resilience Direct protocol:  
 23 "The protocol was circulated prior to the meeting  
 24 via Resilience Direct Collaborate. However, the item  
 25 was deferred until the next meeting due to time

189

1 constraints.  
 2 "Action: all to feed back any comments to SH [which  
 3 is you] prior to the next meeting."  
 4 Can I ask, why wasn't it a priority to progress the  
 5 work on Resilience Direct, particularly bearing in mind  
 6 the sign-off from ACC O'Hare in 2016?  
 7 A. I'm unable to answer that at this time. We would have  
 8 fed this through to — there would have been work  
 9 ongoing with the team who were doing this, which  
 10 included from our colleagues at AGMA, the Association of  
 11 Greater Manchester... and also ourselves, sorry, GMP,  
 12 and we would have brought this, I think, to a number of  
 13 the Resilience Group meetings and for sign-off.  
 14 Q. And I think it's right, isn't it, that the experts, at  
 15 paragraph 3.26.16, go on to describe that protocol as:  
 16 "A high level strategic document which describes  
 17 joint agreement, intention and direction, but it did not  
 18 explain how Resilience Direct would be embedded into the  
 19 core functions or mechanisms for multi-agency  
 20 information and communication, either during emergency  
 21 planning, emergency response or recovery from a major  
 22 incident or other serious emergency."  
 23 And they say this:  
 24 "There was in May 2017 a great deal more development  
 25 to be addressed once the GMRF had finally agreed to the

190

1 draft protocol.”  
 2 A. 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.  
 6 Q. Just tell us then what work had you done to really put  
 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 that procedure.  
 14 Q. So when was it intended that the Greater Manchester  
 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.  
 22 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  
 24 at briefly in a moment been circulated to anyone in the  
 25 Resilience Forum?

191

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  
 4 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.  
 7 Q. If we could then display again {INQ040445/1}.  
 8 Thank you.  
 9 This is the document that you'd been working on?  
 10 A. Yes.  
 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?  
 14 A. Limited probably to the team. I don't recall if anybody  
 15 else on the wider (sic) had access to it.  
 16 Q. Can we move, please, to {INQ040445/6}. We can see there  
 17 an example of a type of form that could be used for  
 18 notification of an incident on Resilience Direct.  
 19 A. Yes, that's correct.  
 20 Q. Was that something that was taken directly from the  
 21 Cabinet Office document for Resilience Direct?  
 22 A. 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  
 25 remember.

192

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:  
 6 "Detailed guidance notes appeared with this document  
 7 at annex 1."

8 And again, do you recall whether this was something  
 9 taken directly from the Cabinet Office Resilience Direct  
 10 toolkit?

11 A. I can't recall at this stage.

12 Q. We can see that the benefit of this document is it  
 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  
 20 tools to be used by all three blue light services or  
 21 other category 1 or 2 responders?

22 A. It could be, yes.

23 Q. And then, please, we can see annex 2, which is at  
 24 {INQ040445/55}. An example of — perhaps just expand  
 25 the bottom half of the page, please, Mr Lopez.

193

1 Again, an example of a document template for the  
 2 METHANE format. Again, it would have been accessible  
 3 and usable by all blue light responders if it had been  
 4 in place?

5 A. That's correct.

6 Q. Perhaps to best typify the benefit of these documents,  
 7 could we look at, please, {INQ040445/60}, Mr Lopez.

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  
 16 benefits of having Resilience Direct and usable by all  
 17 blue light services?

18 A. Yes.

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

22 A. I believe so, yes.

23 Q. The experts have said this and I want to give you an  
 24 opportunity to comment on both of these aspects, please.  
 25 They say this, and I'm at {INQ035309/226} of their

194

1 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  
 4 shared using Resilience Direct."  
 5 I think, looking at what you'd envisaged, that would  
 6 certainly be the case?

7 A. It could be, yes.

8 Q. And that also they say that:  
 9 "Resilience Direct was available to the GMP FDO  
 10 at the time of the arena attack."  
 11 A. He had an account, yes.

12 Q. They also say that:  
 13 "Resilience Direct is deliberately designed to be  
 14 able to operated both as part of the major IT  
 15 arrangement but as also a entirely standalone capability  
 16 using Wi—Fi or mobile phone internet access and it  
 17 certainly could have been operated at the forward  
 18 command post."  
 19 A. I believe so.

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

22 A. Yes, it would be.

23 Q. And the experts are also of the view that:  
 24 "Resilience Direct access would have provided  
 25 scene—based multi—agency tactical Silver commanders with

195

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,  
 4 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:  
 7 "The information void between multi—agency control  
 8 rooms and between control rooms and the forward command  
 9 post is not inevitable and that the capability in  
 10 Resilience Direct exists to enable first responder JESIP  
 11 interoperability if it were available."  
 12 A. I believe so, yes.

13 Q. Thank you.

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

20 SIR JOHN SAUNDERS: No, thank you.

21 MS CARTWRIGHT: Could I first of all turn to GMP to see —  
 22 no, I should go to the families first. I think it's  
 23 Mr Atkinson on behalf of the families who's asking the  
 24 questions.

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

196

1 MS CARTWRIGHT: I do apologise, Mr Weatherby.  
 2 MR WEATHERBY: I have not got many questions. Thank you  
 3 very much, Ms Cartwright.  
 4 Questions from MR WEATHERBY  
 5 Mr Henderson, very quickly, with respect to  
 6 Resilience Direct, have I understood you correctly, that  
 7 it was available for use on the night by the FDO and for  
 8 use at the scene?  
 9 A. The protocol as such hadn't been signed off. The  
 10 document that we've just gone through was a draft  
 11 document, so it wouldn't have been seen at this stage by  
 12 the FDO.  
 13 Q. Right. So you would not have expected the FDO or the  
 14 ground—assigned tactical firearms commander, for  
 15 example, to have used it?  
 16 A. Not at this stage because of where we were in the  
 17 development of Resilience Direct.  
 18 Q. Yes. That's very helpful clarification .  
 19 No criticism implied of you, but given that this was  
 20 available from 2014 from the Home Office, would it be  
 21 fair comment to say that Greater Manchester Police had  
 22 dragged their feet in bringing Resilience Direct into  
 23 force, into use?  
 24 A. I would disagree because of what we went through  
 25 previously, how we had issues in relation to security .

197

1 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.  
 4 Q. Okay. I won't take this much further, but if I've  
 5 understood your evidence correctly it took 4 years to  
 6 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  
 13 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  
 16 signed off, and you expressed the view that neither the  
 17 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  
 23 it had been used to send out situational awareness, but  
 24 you weren't sure when. Would I be right to read from  
 25 that 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?  
 6 A. Not at this stage. However, I can come back with that.  
 7 From memory I can't recall.  
 8 Q. The chair may be assisted by that. Who else apart from  
 9 GMP actually used it on the night? Did Fire and Rescue,  
 10 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  
 16 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.  
 25 Q. Well, the purpose of both systems would be to share

199

1 situational awareness, share — 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  
 8 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.  
 12 Q. The significant difference for our understanding of  
 13 it is that in order to use CLIO, you'd have to be in  
 14 Greater Manchester Police HQ, logged into that section  
 15 of the GMP computer system, whereas with  
 16 Resilience Direct, as long as you had a secure log—in  
 17 and permission, you could be sat in Fire and Rescue 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 CLIO.  
 24 Q. You'd have to have access to the GMP system, whereas  
 25 with Resilience Direct you wouldn't?

200

1 A. That's my understanding, yes.  
 2 Q. Okay. That's helpful, thank you.  
 3 Just finally in relation to CLIO then, you referred  
 4 to, I think it was, Rachel Allen uploading the Plato  
 5 regional document, the version 1.4 that we spoke about  
 6 or we discussed earlier ; yes?  
 7 A. Yes.  
 8 Q. And you've ascertained that she uploaded version 1.4 to  
 9 the CLIO database at 02.39 on the 23rd, so 4 hours into  
 10 the incident.  
 11 A. That's correct.  
 12 Q. Okay. You're here and she isn't, so if you can't answer  
 13 this, please tell us. The purpose of doing so would be  
 14 to share that policy with anybody involved in the  
 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  
 18 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  
 22 from the GMP database that you spoke about at the  
 23 start -- and we'll come on to it in a minute -- and  
 24 uploaded it on to the CLIO system to give access to  
 25 a greater degree of persons?

201

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  
 4 been from the operation planning database.  
 5 Q. All right. Let's move on to that. That's my final  
 6 topic, to reassure everybody about timing. Just in  
 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  
 20 managed?  
 21 A. Plans, mainly plans, and there may have been some  
 22 policies there, but yes, mainly plans.  
 23 Q. Okay. There was a separate database which was  
 24 restricted and that was for firearms policies?  
 25 A. That's what I believe in relation to what's been

202

1 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  
 6 evidence?  
 7 A. That's correct.  
 8 Q. Right. So the inference is that it was taken from the  
 9 Greater Manchester Police database, or copied from that  
 10 database, and put on CLIO for greater readership on the  
 11 night?  
 12 A. To those who would have access to the CLIO site, yes.  
 13 Q. Yes. I've got that right, okay.  
 14 A. Yes.  
 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?  
 21 A. Yes.  
 22 Q. And the version 1.4 document was found on that database;  
 23 yes?  
 24 A. Sorry, you've lost me. Is this, what, on the night?  
 25 Q. No. It's obviously my fault, it's late in the day, I'm

203

1 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.  
 6 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.  
 17 Q. So that document had a number of appendices. We've been  
 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  
 20 that you're unable to assist us as to which version was  
 21 there in March when this document was identified and  
 22 you're also unable to assist us with which version was  
 23 on that document in May when Rachel Allen uploaded it on  
 24 to CLIO?  
 25 A. No, because you should be able to open that document on

204

1 CLIO.  
 2 Q. Right.  
 3 SIR JOHN SAUNDERS: Mr Weatherby, are we sure that  
 4 appendix C would have been attached to the 1.4 document  
 5 that went on the general database? I only say that  
 6 because it has details about firearms operations, which  
 7 you might expect not to go on the general database. I'm  
 8 only asking whether it would have been or not.  
 9 Do you happen to know? Do you know whether appendix  
 10 C was attached to that document on your database?  
 11 A. I'm not 100% sure. I can go back and check.  
 12 MS CARTWRIGHT: I was going to say, sir, the witness is  
 13 providing an additional statement. Perhaps in that he  
 14 could clarify whether there was an appendix C as part of  
 15 the attachment to the email of Jo Hoyte of 29 March, but  
 16 also clarify the document that's uploaded to CLIO,  
 17 whether or not there's an appendix C that sits within  
 18 that document, which might allow the best clarification.  
 19 SIR JOHN SAUNDERS: Okay. Mr Weatherby, I may be raising a  
 20 hare which means nothing and it may be that it was  
 21 attached to both, but I just think it might be a good  
 22 idea to check, might it?  
 23 MR WEATHERBY: With respect, I entirely agree, sir. That  
 24 should have been a question I asked before the one  
 25 I did. That would be very helpful and that would deal

205

1 with the point. Perhaps we could add to it that if  
 2 appendix C was appended to the March attachment and  
 3 the May download, perhaps we could know the versions of  
 4 it.  
 5 SIR JOHN SAUNDERS: Do you understand the point,  
 6 Mr Henderson?  
 7 A. Yes, I do understand that.  
 8 SIR JOHN SAUNDERS: We'd like you to check on those, please.  
 9 MR WEATHERBY: Finally, this. So far as the other document  
 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 time.  
 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  
 20 questions I have.  
 21 MS CARTWRIGHT: Could I briefly make an enquiry of others?  
 22 I understand there's only a very small portion of  
 23 questioning left. There was an indication that  
 24 Mr Atkinson may have one small area he wished to cover.  
 25 Can I clarify that?

206

1 MR ATKINSON: No, thank you very much, Ms Cartwright.  
 2 Mr Weatherby has covered all that I would otherwise have  
 3 needed to ask. Thank you.  
 4 MS CARTWRIGHT: Sir, there's only then Mr Horwell who would  
 5 have questions on behalf of GMP. I do apologise,  
 6 Mr Mansell. Can you confirm how long you think you may  
 7 be in questioning?  
 8 MR MANSELL: Around 10 minutes.  
 9 SIR JOHN SAUNDERS: Mr Mansell, you broke up the first time,  
 10 but if you sit closer to the computer, when you leant  
 11 forward I think we heard you better.  
 12 Questions from MR MANSELL  
 13 MR MANSELL: The first topic I'm going to ask you about,  
 14 Mr Henderson, is Winchester Accord.  
 15 Can we have up, please, Mr Lopez, {INQ007615/1}.  
 16 These are the major incident public order and events  
 17 group meeting minutes of 7 July 2016 that you were asked  
 18 about; yes?  
 19 A. Yes, that's correct.  
 20 Q. If we go to page 3, please, we can see the feedback you  
 21 gave about Winchester Accord. If we could zoom in on  
 22 the bottom half of the page, please. {INQ007615/3}.  
 23 I'm looking at paragraph 17, Mr Henderson, where you  
 24 say:  
 25 "The exercise had been run specifically to test

207

1 whether the FDO could work in isolation and it had been  
 2 established that this did not work. Some work has  
 3 already been done in relation to potentially bringing  
 4 radio operators from [operationally sensitive] to force  
 5 headquarters."  
 6 Can you see that?  
 7 A. Yes, I can.  
 8 Q. Did that accord with your understanding that during the  
 9 exercise, the FDO was not in his usual location in the  
 10 operational control room?  
 11 A. That's correct.  
 12 Q. And the reason for that was to test during the exercise  
 13 whether the proposed move from the operational control  
 14 room to force headquarters would be effective?  
 15 A. I believe so, yes.  
 16 Q. And the exercise appeared to demonstrate that that move,  
 17 as it was planned at the time, was not a good idea; was  
 18 that your understanding?  
 19 A. From the feedback, yes.  
 20 Q. That can come off the screen, please, Mr Lopez.  
 21 Moving next to Resilience Direct, you've explained  
 22 that GMP had security concerns about Resilience Direct  
 23 and required more information and assurances?  
 24 A. That's correct.  
 25 Q. In essence, were those concerns around the potential for

208

1 a large number of people being able to access sensitive  
 2 police documents?  
 3 A. I believe so.  
 4 Q. Mr Lopez, please can we have {INQ034412/1} on the  
 5 screen, please.  
 6 Is this your paper setting out the position  
 7 in relation to GMP and GMRF and Resilience Direct  
 8 in September 2016?  
 9 A. I did mention in my statement that it wasn't signed or  
 10 dated. However, I believe that looking back at it,  
 11 I was involved in the writing of it, yes.  
 12 Q. Thank you. Can we move, please, Mr Lopez, to  
 13 {INQ034412/3}, the bottom of that page. It's the  
 14 penultimate paragraph.  
 15 It says:  
 16 "Security level of Resilience Direct. The security  
 17 level of the system has been challenged by some of the  
 18 police forces across the UK, including GMP.  
 19 Historically, there has been a reluctance by all  
 20 partners to upload sensitive information to RD, limiting  
 21 the multi-agency use and general buy-in."  
 22 Were you aware that GMP's security concerns were  
 23 shared by other forces?  
 24 A. In this document, I believe so, yes. I can't recall at  
 25 this stage where that information may have come from,

209

1 but I must have been at the time of writing.  
 2 Q. Mr Lopez, that can come off the screen.  
 3 SIR JOHN SAUNDERS: Can you tell me the date of that  
 4 document?  
 5 MR MANSELL: It's 28 September 2016, sir.  
 6 SIR JOHN SAUNDERS: Thank you very much. By then it was  
 7 clear that the IT manager who had the concerns was  
 8 satisfied with security. That's just what we had on  
 9 screen.  
 10 MR MANSELL: Yes.  
 11 Mr Henderson, is that right, that this coincides  
 12 with ACC O'Hare signing off the risk assessment for  
 13 Resilience Direct in September 2016?  
 14 A. That's correct.  
 15 SIR JOHN SAUNDERS: Thank you.  
 16 MR MANSELL: And then did the work pass to the GMRF for the  
 17 development of the protocol on Resilience Direct?  
 18 A. It did.  
 19 Q. And you were working on that; yes?  
 20 A. Yes, that's correct.  
 21 Q. But on behalf of the GMRF; is that right?  
 22 A. That's correct.  
 23 Q. Finally, this: CLIO. You explained that other agencies  
 24 can access CLIO if they have access to the GMP computer  
 25 system; is that right?

210

1 A. That's correct.  
 2 Q. Does that normally occur only once the force command  
 3 module or FCM is established?  
 4 A. Yes, normally unless they had access to GMP systems  
 5 previous to the CLIO signed in.  
 6 Q. In May 2017, would you have expected the three blue  
 7 light services to be communicating using CLIO in the  
 8 early stages of an incident or not?  
 9 A. The force using GMP systems and them logging in to it,  
 10 it was a possibility, yes.  
 11 Q. At the force command module?  
 12 A. Yes.  
 13 MR MANSELL: Thank you, Mr Henderson.  
 14 Sir, that is all I ask.  
 15 SIR JOHN SAUNDERS: Thank you very much, Mr Mansell.  
 16 Further questions by MS CARTWRIGHT  
 17 MS CARTWRIGHT: Sir, I have one question, and obviously  
 18 Mr Mansell must come back if he wishes to. It's just on  
 19 the September 2016 document that the witness was taken  
 20 to. Could I ask for that to be displayed, please?  
 21 {INQ034412/5}.  
 22 Conclusions and recommendations. I think you've  
 23 identified, Mr Henderson, that this was the paper that  
 24 you wrote, but we can see under your conclusion and  
 25 recommendations for Resilience Direct, you say this:

211

1 "Resilience Direct provides a government backed  
 2 suite of tools which whilst not all organisations within  
 3 GMRF require all of the functionality, it provides  
 4 a means to use all of the functions in a compatible  
 5 multi-agency environment (especially in a response phase  
 6 of an incident). Whilst it is used by some partners  
 7 more than others, its role is essential for those who do  
 8 not have another means to send and receive restricted  
 9 documents. For this reason, it is likely that  
 10 Resilience Direct's use would be critical during  
 11 a threat-based major incident where all related  
 12 information would be very sensitive. There is  
 13 a government expectation that Resilience Direct would be  
 14 used as a reporting tool to provide situational  
 15 awareness. It would therefore be beneficial for GMP and  
 16 GMRF's partners to have embedded familiarity with  
 17 Resilience Direct to enhance ad hoc no-notice required  
 18 use."  
 19 And was that your considered position in September  
 20 of 2016?  
 21 A. Yes.  
 22 SIR JOHN SAUNDERS: And then you got to work on producing  
 23 a protocol?  
 24 A. Yes, for the resilience forum.  
 25 SIR JOHN SAUNDERS: And then when that was put before the

212

1 forum for discussion, the discussion was actually put  
 2 back to a future hearing because of lack of time?  
 3 A. Yes, that's correct.  
 4 SIR JOHN SAUNDERS: How much is the gap between these  
 5 forums? How long is the gap?  
 6 A. I think ... Is it every -- it may be quarterly. I could  
 7 double check. I will come back to you on that.  
 8 SIR JOHN SAUNDERS: I think that may be what we'd actually  
 9 heard before.  
 10 MS CARTWRIGHT: So it assists -- and it might be helpful to  
 11 clarify it in a witness statement -- we can see  
 12 reference to it, protocol being discussed in the minutes  
 13 in February of 2017. Then in the minutes for 15 May it  
 14 references that there's no time to discuss it, but there  
 15 is reference that it would be discussed at the meeting  
 16 the following week, so perhaps the witness could clarify  
 17 that.  
 18 SIR JOHN SAUNDERS: Perhaps we'd better look at that, yes.  
 19 MS CARTWRIGHT: Does Mr Mansell wish to come back at all in  
 20 respect of that additional question I asked?  
 21 MR MANSELL: I don't, thank you.  
 22 MS CARTWRIGHT: My understanding is that concludes all of  
 23 those who have questions this afternoon. Can  
 24 I thank you, sir, for sitting later and also the  
 25 witness.

213

1 SIR JOHN SAUNDERS: You don't need to thank me. Thank you  
 2 to everyone else and perhaps particularly to those who  
 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 (The inquiry adjourned until 10.00 am  
 23 on Wednesday, 24 February 2021)  
 24  
 25

214

1 INDEX  
 2  
 3 INSPECTOR SIMON LEAR (sworn) .....1  
 4 Questions from MR GREANEY .....1  
 5 Questions from MR WEATHERBY .....64  
 6 Questions from MR HORWELL .....102  
 7  
 8 INSPECTOR STEPHEN HENDERSON (sworn) .....112  
 9 Questions from MS CARTWRIGHT .....112  
 10 Questions from MR WEATHERBY .....197  
 11 Questions from MR MANSELL .....207  
 12 Further questions by MS CARTWRIGHT .....211  
 13  
 14  
 15  
 16  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

215

216

A						B
ability (6) 33:10 92:16 124:14 135:3 142:23 196:17	actively (2) 61:4 89:7 activity (2) 20:21 61:13 actual (6) 89:1 97:6 129:6 158:14,14,17 actually (44) 7:24 20:6 26:11,16 28:6 33:1 38:10 40:22 41:7 44:8 62:6 68:17 70:14,17 73:8 74:11 76:5 83:10 90:6 93:18 102:3,12 105:11 107:24 109:8 110:16,18 116:8 119:1 133:22 136:23 141:25 143:1 146:20 156:17 161:22 174:19 181:5 184:8 198:3 199:9 213:1.8 214:3	agreed (4) 3:22 175:14 178:17 190:25 agreeing (1) 41:15 agreement (3) 93:22 190:17 191:21 ahead (4) 8:10 17:10 33:15 45:13 aid (1) 34:7 airwave (2) 152:3 154:24 airwaves (3) 116:10 151:19 152:18 alastair (1) 177:3 albeit (1) 54:8 alerted (1) 160:5 allen (11) 116:12 139:15,19,25 140:8 141:7 144:4 201:4,21 203:3 204:23 allow (6) 45:5 53:6 61:12 177:25 187:2 205:18 allowed (2) 19:21 175:22 allowing (2) 30:25 62:10 allows (3) 182:6 184:9 193:13 alluded (1) 27:5 almost (6) 11:13 35:17 40:23 86:23 152:24 184:4 along (4) 9:21 20:8 56:9 182:5 alongside (1) 173:6 already (19) 23:16 26:23 33:12 45:25 54:15 66:12 67:6 98:23 110:23 122:12 130:8 131:8 136:19 152:9 161:3 162:4 166:19 181:21 208:3 also (79) 7:4,10 9:1 16:25 22:1 28:24 38:5 43:9 44:5,14 50:23 51:13 66:24 69:14 94:23 104:6 105:6,17 107:20 109:9 115:9,24 116:12,23 117:8,8,15 118:9,16 120:2 122:10 124:25 138:18 139:6,19 140:7 141:12 145:10,18 147:2 148:3,6 149:25 150:8 155:11 157:4,5 158:23 160:9,10 161:5 169:1 171:20 176:8 177:10,14,15,16 178:20,24 180:22 181:5 182:4 183:12 184:9 185:12 190:11 191:11 193:3,5 194:12 195:8,12,15,23 196:6 204:22 205:16 213:24 although (6) 5:13 30:8 45:24 59:5 68:21 138:6 altogether (3) 5:6 67:8,9 always (7) 9:23 15:11,12 16:6 34:6 63:13 65:19 ambiguity (8) 58:12,15 68:6,7 69:6,19,24 135:14 ambulance (4) 61:11 103:1 111:1 173:17 amend (2) 82:20 134:3 amendment (4) 28:13 78:9,19,20 among (3) 56:20 154:12 186:19 amongst (1) 76:25 amount (3) 35:4 45:25 146:21 and/or (4) 60:7 62:12 73:20 144:16 andrew (3) 1:8,13 29:12 angle (1) 203:16 annex (7) 39:21 49:11 68:2 87:23 193:7,17,23 another (10) 12:23 44:25 71:6 76:24 99:10 101:1 155:11 173:6 187:13 212:8 answer (20) 4:10 5:15 8:12 14:17 20:2,8 53:22 69:11 74:18 82:24 84:1,24 103:4 105:23 157:17 158:2,6 190:7 201:12,17	answering (2) 125:14,19 answers (1) 85:4 anthony (3) 64:15 164:7,8 anybody (4) 65:5 139:3 192:14 201:14 anyone (20) 11:17 18:6 22:11 26:16 41:19 42:1 51:9 53:21 59:6 68:24 83:21 104:23 123:24 133:1,3 144:19 146:20 158:5 191:24 192:13 anything (19) 28:9 31:6 33:23 52:10 62:19,23 65:10,23 76:15 97:4 102:7 132:22 133:2,12 158:20 186:15 188:11 189:11 196:18 anyway (3) 9:5 50:25 95:4 anywhere (3) 44:22 74:15 200:20 apart (5) 57:15 68:24 73:11 76:13 199:8 apologies (1) 214:5 apologise (9) 90:4 91:16 127:20 161:24 165:24 185:18 189:14 197:1 207:5 app (1) 93:6 apparently (3) 62:23 81:7 85:17 appear (5) 13:3 72:2 95:19 188:23 189:1 appeared (2) 193:6 208:16 appears (8) 72:15,15,20,23 74:8 92:7 97:13,16 appended (1) 206:2 appendices (2) 204:17,18 appendix (26) 36:11,15 37:5 49:23 50:7,18 55:6,7 58:3 72:1 96:8 136:25 137:13 140:2 146:6,7,12 161:16 162:12,14 204:13 205:4,9,14,17 206:2 applications (1) 186:13 applied (3) 68:16 94:4 122:7 applies (1) 41:5 apply (2) 41:5 70:7 appoint (1) 95:16 appointed (1) 91:5 appreciate (7) 5:8,12 12:5 105:5 151:16,18 153:4 approach (1) 92:18 approached (1) 175:24 appropriate (6) 117:5,12 126:21 133:3 160:4 167:22 approval (4) 70:23 71:4 73:16 74:1 approve (1) 70:22 approved (22) 51:21 56:6 70:15,18 71:2 73:8,12,14 74:20 75:13,14,23 76:1 77:13,20,22 78:3 118:24 126:19,20 130:1 138:7 approves (1) 70:19 approximately (4) 4:6,18 48:16 115:4 april (7) 16:7 46:7 101:3 108:21 168:11,17,18 april/may (1) 18:2 archive (1) 49:13 archived (1) 35:10 area (12) 12:21 66:5 136:16 141:24 158:10 166:15 168:3 187:1,3,6,9 206:24 areas (5) 61:14 88:8 112:14 163:8 166:10 arena (14) 22:9,12 124:13 138:22 139:14 141:14 169:21 170:6 171:2 192:12 195:10 196:2 198:7 199:21 arent (2) 75:18,18 arisen (1) 161:15 arises (1) 149:6 arising (3) 62:14 148:9 151:8 armed (14) 30:5 34:1,4 47:6 51:7 60:9 71:24 93:9,20 94:9 95:4 128:11 137:6	143:8 armouries (1) 9:22 armoury (1) 9:23 arose (2) 58:21 99:3 around (19) 17:7 29:7 42:13 85:5 90:3 117:16 119:13,14 123:16 147:1,22 148:3 152:20 154:20 172:14 175:19 188:1 207:8 208:25 arrange (1) 27:20 arranged (2) 27:19 45:12 arrangement (1) 195:15 arrive (1) 89:23 arrived (3) 85:17,18 127:10 arrives (1) 92:3 arriving (1) 154:22 articulate (1) 100:20 arv (2) 36:3 37:3 ascertained (1) 201:8 aside (1) 156:24 ask (65) 1:7 4:3,9 5:4,12,13 8:13 12:8 33:21 34:1 35:21 40:14 44:19 45:21,22 46:8 47:16,20 57:6 58:16 59:23 60:3 62:19 65:1 71:4,5 77:11 78:3 83:7,8,17 85:7,17 88:6,9 97:15 102:22 104:8 109:21,23 112:10,21 113:5 114:6 118:8 125:14 129:16 132:18 133:4 134:16 135:10 142:22 147:18 150:5,18 152:8 153:23 155:8,25 188:8 190:4 207:3,13 211:14,20 asked (31) 18:13 40:13 62:21 63:21 70:15 72:3 77:15 96:20 101:25 102:1,2,20,20 103:8 104:3,15 106:8,18 107:5,14 108:2 135:16 149:5 152:2 157:22,24 205:24 206:10 207:17 213:20 214:19 asking (17) 16:3 45:8,23 65:6 73:7 79:14 88:11 104:7 105:24 133:3,11 135:11 157:14 176:21 195:1 196:23 205:8 aspect (5) 115:25 123:5 144:24 148:16,16 aspects (6) 94:11 149:5 161:17 168:7 194:24 196:15 assessment (5) 175:25 117:15 184:4,14 210:12 assessments (3) 122:24 182:2 195:3 assets (5) 10:13 93:20 94:9,23 96:5 assigned (1) 92:15 assist (26) 19:18 35:21 37:19 56:15 60:1 103:13 114:16 117:4 119:25 121:22 129:25 130:12 132:14 140:6 148:6 152:11 158:9 164:8 167:2 171:2 179:3 183:8 184:16 187:19 204:20,22 assistance (3) 60:7 172:23 214:18 assistant (1) 184:16 assisted (1) 199:8 assisting (3) 60:10 113:21 119:9 assists (2) 172:13 213:10 association (2) 179:11 190:10 assume (10) 27:3 92:4 122:25 124:8 128:5 135:22 149:23 156:15 159:19 171:10 assumed (2) 71:1 159:1 assuming (1) 73:12 assumption (8) 23:25	25:24,25 26:1,3 66:7,19 72:11 assumptions (1) 25:25 assurance (3) 18:16 22:5 59:19 assurances (1) 208:23 assured (1) 16:25 atkinson (3) 196:23 206:24 207:1 attached (14) 57:8 68:20 69:5 71:25 104:13 131:2,4 133:23 134:14 137:8 146:12 205:4,10,21 attachment (4) 137:5 139:23 205:15 206:2 attachments (1) 57:2 attack (30) 22:9,12 29:25 30:12,18,24 37:25 39:13 43:12 49:13 60:23 71:11 98:19 107:16 124:13 130:2 138:8,10 139:14 141:14 142:11 146:18 169:22 170:6 171:3 182:16 192:12 195:10 198:7 199:21 attacks (3) 49:19 121:6 124:25 attempted (1) 27:19 attend (5) 99:24 100:23 101:12 108:25 109:17 attendance (3) 99:13,14,18 attended (10) 59:14 97:3,7,9 99:15 100:14 117:24 118:4 127:6 154:1 attendees (3) 108:15,19 160:24 attending (4) 109:2 118:19 119:7 134:16 attention (6) 43:8 57:12 60:18 69:23 153:7 155:15 audit (8) 73:18 74:18 75:15,25 79:24 80:4 129:13 142:25 auditing (1) 126:11 august (3) 11:18 39:15 188:16 august/september (1) 11:12 austerity (1) 107:9 author (1) 179:17 authored (3) 124:10 130:17 132:12 authorise (2) 34:10 70:24 authorised (4) 7:22 13:19 56:13 93:9 authorities (1) 179:12 authority (5) 33:5 56:12 74:13 93:8 139:4 authors (1) 46:18 automatically (3) 29:5 93:25 94:24 available (16) 91:5,21,23 135:7 138:9,17 141:13 22:11 23:5 37:15,17,18 39:23 50:10 57:15 61:22 63:1 68:6 69:21 73:11 77:4 83:5,11 86:11 93:24 98:17 100:9 107:18 116:24 123:21 130:9 132:19 133:5 139:5 150:21 152:4 154:5,25 160:15 162:21 164:20 167:14 170:25 171:6,16 177:16,16 185:2,14 198:15 209:1 213:12 belief (7) 38:4 71:23 72:2 75:12 113:10,17 147:7 believe (54) 6:15,17,18 10:7 47:5 51:19 59:20 71:17 72:11 74:13 75:7 77:14,15,17 84:5 97:9 98:5,15,16,20,20 103:25 104:1 119:13,14 121:8 130:13 135:9 137:9 138:8 141:16 142:3,9 151:3 152:7 154:1 157:9 159:11 170:2 171:8 175:24 194:22 195:19 196:12 198:1 199:2 202:3,25 206:12,12 208:15	



209:3,10,24  
**believed (3)** 30:21 37:17  
 140:16  
**beneath (4)** 10:15,17 36:9,18  
**beneficial (5)** 140:16 151:22  
 167:9 178:25 212:15  
**benefit (7)** 105:16  
 174:14,19,21 193:12 194:6  
 195:20  
**benefits (3)** 179:22 186:9  
 194:16  
**bereaved (1)** 63:22  
**best (14)** 27:18 35:19  
 63:11,17 75:18 104:3  
 113:9,16 139:1 147:7  
 153:11 158:12 194:6  
 205:18  
**better (14)** 14:19 21:25  
 36:24 41:24 53:23 58:10  
 63:12 70:23 87:1 93:11  
 102:16 158:7 207:11  
 213:18  
**between (35)** 8:1 12:19  
 15:1,22 16:7 18:1,23 22:15  
 48:17 50:15 65:11 66:17  
 67:11 75:3 93:17,22  
 94:13,20 96:23 97:18,23  
 98:14 107:2 109:3 154:9  
 155:1 166:14 171:23  
 173:11 179:23 182:7  
 196:3,7,8 213:4  
**beyond (3)** 73:9 109:11  
 136:15  
**bit (13)** 34:8 53:23 72:7  
 83:12 85:5 89:24 109:6  
 119:25 132:21 134:1  
 158:7,10 168:3  
**black (3)** 55:5 57:17 166:5  
**blank (1)** 187:2  
**block (1)** 110:20  
**blue (6)** 173:16 174:15  
 193:20 194:3,17 211:6  
**board (1)** 41:4  
**boil (1)** 60:4  
**bombing (1)** 138:21  
**booth (10)** 22:3,11 23:3  
 25:9,10 26:16 31:16 32:5  
 33:6 162:22  
**boots (1)** 35:6  
**both (18)** 13:25 14:24  
 50:5,21 54:14 87:16 94:12  
 124:5 156:6 177:11  
 181:2,21 194:24 195:14  
 199:25 200:7,8 205:21  
**bother (1)** 111:18  
**bottom (12)** 29:10 43:5  
 45:10 85:4 86:15 130:5,6  
 131:24 193:25 194:8  
 207:22 209:13  
**boundaries (1)** 168:23  
**boundary (1)** 35:14  
**box (2)** 1:6 112:10  
**boyd (1)** 113:2  
**bracket (1)** 48:2  
**branch (10)** 25:11,11,18 28:2  
 29:24 43:15 114:13,17  
 115:14 117:23  
**break (6)** 48:8 54:15 110:17  
 167:22,25  
**breaks (1)** 111:17  
**bridge (1)** 71:11  
**brief (3)** 95:2 161:13,17  
**briefing (1)** 164:25  
**briefings (2)** 186:20 187:6  
**briefly (6)** 66:10 96:19  
 153:16 162:25 191:24  
 206:21  
**brigade (3)** 52:23 99:17  
 157:21  
**bring (8)** 26:22 46:11 60:11  
 67:7,8,18 86:22 198:6  
**bringing (4)** 26:25 162:4  
 197:22 208:3  
**broadly (1)** 169:17  
**broke (1)** 207:9  
**broken (1)** 53:7  
**bronze (2)** 95:1,16  
**brought (18)** 6:14 9:13  
 26:13,17 32:4 69:23 74:20  
 81:7 101:14 140:19 141:1  
 152:11 153:6 155:18  
 168:11,17 169:1 190:12  
**btp (1)** 181:17  
**buchan (1)** 29:12  
**budget (1)** 107:8  
**bullet (3)** 30:8 106:16 153:23  
**bundle (2)** 84:6 113:3  
**burden (1)** 11:22  
**bus (3)** 53:21 158:5,8  
**business (3)** 12:21 36:14  
 109:14  
**buyin (1)** 209:21  
**bystander (1)** 61:12  
**bystanders (2)** 60:25 61:4

---

**C**

---

**c (24)** 36:11,15 37:5 39:21  
 49:11,23 50:7,18 55:6,7  
 58:3 68:2 72:1 136:25  
 137:13 146:6,7,12 204:13  
 205:4,10,14,17 206:2  
**cabinet (5)** 168:12 169:20  
 174:14 192:21 193:9  
**cadre (5)** 90:23 91:4,21,23  
 163:23  
**calendar (1)** 187:6  
**call (3)** 79:5 85:13 87:9  
**called (3)** 15:10 19:19 36:3  
**calls (1)** 20:22  
**came (25)** 17:15 22:1,4  
 27:10 32:8,13 39:19 66:2,3  
 74:25 78:2 84:3,25 97:6  
 107:23 110:19 114:4  
 128:11 129:9 133:15  
 152:13 155:23 158:25  
 159:7 185:18  
**candid (1)** 8:12  
**candidly (1)** 5:11  
**cannot (7)** 61:15 108:18  
 127:9 138:6 144:11 184:12  
 198:8  
**cant (44)** 20:22 24:9 57:14  
 63:18 68:23 69:13 74:17  
 75:16,20 76:14 82:22,24  
 98:25 99:6,6,11,11  
 105:15,23 106:23  
 111:6,12,15 125:18 132:5  
 136:8 141:23 150:14,23  
 152:13 155:22 156:7  
 158:19 180:13 182:19,23  
 189:7 192:22,24 193:11  
 199:7 201:12 206:13  
 209:24  
**capabilities (1)** 172:8  
**capability (6)** 36:4 37:3  
 137:6 166:4 195:15 196:9  
**capable (3)** 55:4 57:20  
 105:17  
**capacity (2)** 65:16 167:18  
**capture (2)** 140:3 150:1  
**captured (2)** 85:14 144:21  
**car (1)** 111:14  
**card (1)** 45:13  
**cards (10)** 19:18,24 20:6  
 21:14,19 23:10 24:4,8  
 25:5,5  
**careful (1)** 198:22  
**cartwright (51)** 112:9,24,25  
 127:20 131:24 133:17  
 136:12,17,25 137:2,4  
 139:11 141:22 142:22  
 144:1,4 146:19,23 147:1  
 155:25 157:11 160:4,20  
 161:24 163:1 164:24  
 165:7,19 167:12 168:2,18  
 171:18 189:14,17 196:21  
 197:1,3 205:12 206:21  
 207:1,4 211:16,17  
 213:10,19,22 214:5,10,14  
 215:9,12  
**cast (2)** 149:23 150:5

**casualties (5)** 60:10,24  
 61:3,5,14  
**casualty (1)** 149:25  
**categorically (1)** 202:2  
**category (5)** 117:11 146:7  
 169:17,17 193:21  
**cathedral (1)** 111:14  
**cause (2)** 16:10 143:6  
**caused (2)** 57:19 69:24  
**causing (2)** 55:4 131:18  
**caveated (1)** 178:9  
**caveats (1)** 178:20  
**cc (1)** 166:23  
**ccru (2)** 114:7 125:6  
**cell (3)** 164:21,25 194:13  
**central (3)** 22:25 86:25  
 179:24  
**centre (3)** 164:15 167:5  
 173:21  
**centres (5)** 97:19,24 98:14  
 99:5 196:3  
**certain (4)** 44:11 56:17  
 127:13,22  
**certainty (1)** 46:3  
**cesg (2)** 177:6,7  
**cetera (9)** 25:19 87:24  
 111:11,11 121:17 150:4  
 173:11 174:2 192:23  
**chain (6)** 76:15 175:19  
 176:18,21 177:1,21  
**chair (1)** 199:8  
**chairman (14)** 17:12 21:16  
 26:21 60:2 61:19 138:24  
 156:4 157:12,14 172:11  
 177:20 179:3 196:14,16  
**chairmans (5)** 28:14 126:6  
 143:14 144:9 155:9  
**challenged (1)** 209:17  
**challenge (2)** 68:12 82:9  
**change (13)** 12:20  
 28:18,21,22 29:1,2  
 78:12,13,19 124:20 126:3  
 128:20 152:11  
**changed (7)** 51:19 57:17  
 79:16 80:8 81:10,17 126:9  
**changes (7)** 81:14 104:21,24  
 105:5,17 106:10,13  
**channel (4)** 98:3,12 151:21  
 152:6  
**channels (5)** 72:8,9 98:10  
 151:19 152:18  
**charge (8)** 4:13 7:14 22:4  
 23:19 25:10 47:5 93:1,13  
**chasing (2)** 177:23 178:3  
**check (12)** 9:18 14:16 81:6  
 83:22 119:14 120:22  
 129:14 152:5 205:11,22  
 206:8 213:7  
**checked (2)** 83:23 152:6  
**checking (4)** 7:7 9:2,21  
 144:13  
**checks (3)** 7:5 8:9 139:11  
**cheshire (3)** 51:15,16 79:21  
**chief (26)** 4:12 5:24 12:11  
 14:23 22:3,4 25:8,10 27:13  
 32:24 33:4,9 34:9 47:10,17  
 51:12 56:2 65:21 74:4 75:6  
 76:14 79:20 100:24 101:4  
 162:22 184:16  
**chronic (1)** 64:21  
**churn (1)** 12:22  
**cipher (1)** 114:7  
**circular (1)** 85:14  
**circulated (11)** 56:9 59:3  
 80:22 86:7 87:25 131:5  
 161:14 185:16 189:23  
 191:22,24  
**circulating (1)** 130:22  
**circulation (2)** 86:6 88:2  
**circumstances (2)** 36:10 90:3  
**cited (1)** 155:1  
**civil (20)** 114:4,9,14,18,23  
 116:9,21 117:9,16  
 118:4,24 119:9 123:25  
 145:9,17 146:24 147:12  
 161:4 168:21 169:2

**clarification (7)** 121:22  
 123:16,17 158:10 177:4  
 197:18 205:18  
**clarified (3)** 85:21 122:12  
 147:3  
**clarify (8)** 112:12 141:9  
 142:10 205:14,16 206:25  
 213:11,16  
**clarity (1)** 144:10  
**classifications (1)** 186:16  
**clear (33)** 5:15 15:14 31:2  
 37:10 49:15 50:19,20,25  
 55:11 69:19 70:9 76:7 77:3  
 79:10 86:2 88:9 95:9,19  
 103:20 107:24 108:7 116:2  
 126:10 127:21 143:24  
 144:3,5 151:23 183:2  
 193:13,19 199:14 210:7  
**clearance (5)** 125:5,10,21,23  
 201:15  
**cleared (1)** 125:5  
**clearer (1)** 55:23  
**clearing (1)** 125:15  
**clearly (6)** 43:24 68:22,23  
 104:12,23 131:11  
**clerical (1)** 57:15  
**clio (51)** 138:21,24  
 139:1,4,13,24 140:3,19  
 141:1,5 143:5,16,20,21  
 167:1,6 172:21,22  
 173:4,6,8,11,13,15,18,20  
 174:5,6,8,10,20 195:21  
 199:13,18,22 200:7,13,23  
 201:3,9,15,24 203:10,12  
 204:24 205:1,16 210:23,24  
 211:5,7  
**close (2)** 63:23 111:15  
**closed (1)** 177:15  
**closer (1)** 207:10  
**clusters (1)** 42:13  
**coexisted (1)** 67:14  
**coeg (3)** 27:16 32:23 48:6  
**coincides (1)** 210:11  
**cold (2)** 62:13 94:11  
**collaborate (2)** 186:24  
 189:24  
**collaboration (17)**  
 34:2,4,5,6,9,23 51:8 71:25  
 128:12,17 129:6,10,21  
 143:8 179:23 185:24  
 186:18  
**colleague (2)** 52:23 157:21  
**colleagues (6)** 6:16 173:16  
 179:10 185:24 190:10  
 191:9  
**college (5)** 117:25  
 118:9,17,23 119:10  
**colocating (1)** 154:10  
**colour (3)** 104:21 105:14  
 106:7  
**come (48)** 5:10 9:17 12:5  
 16:17 17:10 19:25 47:9  
 56:5 57:16 65:22 70:24  
 71:1 72:9 75:2 76:15 79:22  
 80:12,24 81:1 83:10 89:11  
 97:13 100:11 105:7 110:16  
 111:6 115:7 116:14 120:25  
 121:18 127:5 145:1 146:6  
 150:25 156:15 158:16,19  
 167:3 177:8 199:6,11  
 201:23 208:20 209:25  
 210:2 211:18 213:7,19  
**comes (4)** 32:12 42:1 84:22  
 157:3  
**comfortable (1)** 15:19  
**coming (6)** 3:1 20:22 71:10  
 78:11 93:21 203:18  
**command (32)** 80:5 86:11  
 89:3,14,25 90:14 92:1,6,15  
 93:17 94:10,23 97:19,24  
 98:14 110:3,10 116:10  
 151:24 154:11  
 163:7,10,11,14 166:2,24  
 173:19 195:18 196:3,8  
 211:2,11  
**commander (52)** 13:23 30:18

45:1 62:4,4 76:16 86:13,15  
 88:13,14 18:22,25  
 89:7,10,12,15,19  
 90:12,20,23,25  
 91:3,4,20,22,23  
 92:12,23,23 93:1,14  
 94:7,8,9,21 95:16,17,23  
 96:3,10,20,22 100:9 101:8  
 102:25 109:19 147:21  
 149:8 151:8 153:18 197:14  
**commanders (46)** 17:3 30:6  
 60:7 69:2,7,15 77:4 80:19  
 81:8 82:9  
 86:7,12,12,17,20,20 87:9  
 88:3 90:5,12 91:13 94:18  
 100:14,22,22 101:6  
 105:2,3 106:9 109:4,7,9  
 110:7 131:13 149:17  
 150:20,22 151:20  
 154:7,9,20 164:6 175:3,9  
 183:6 195:25  
**commanding (2)** 30:25 93:1  
**command (10)** 24:9 38:16  
 82:22 127:2 155:22 156:9  
 194:24 197:21 198:8  
 199:12  
**comments (4)** 147:8,14  
 187:23 190:2  
**common (4)** 67:11 153:3  
 154:5 169:10  
**commonly (2)** 106:22 193:4  
**commons (7)** 23:6 72:6,12  
 73:1,2 134:1 166:4  
**communicate (3)** 166:8  
 175:2,8  
**communicated (3)** 30:12  
 31:6 185:6  
**communicates (1)** 186:21  
**communicating (1)** 211:7  
**communication (10)** 22:15  
 97:25 98:14 99:4 111:16  
 154:9 155:1 182:7 187:9  
 190:20  
**communications (7)**  
 25:11,18 28:2 43:15 72:5  
 87:1 151:18  
**communities (2)** 176:23  
 177:3  
**community (2)** 169:16  
 186:11  
**compare (2)** 64:24 102:6  
**comparison (2)** 11:10 109:15  
**compatible (1)** 212:4  
**competencies (1)** 119:4  
**competent (2)** 8:21 13:23  
**competing (1)** 14:13  
**complete (6)** 8:9 30:22  
 74:23 91:2 144:24 147:1  
**completed (8)** 24:7 47:21  
 59:2 105:13 118:16 170:25  
 171:6,7  
**completely (5)** 5:7 25:24  
 62:13 78:22 103:24  
**compliance (11)** 4:8 5:17  
 6:13 7:5 8:9,24 9:21 14:15  
 34:16 64:5 87:6  
**complied (1)** 29:21  
**complying (1)** 9:19  
**comprising (1)** 51:7  
**computer (6)** 38:13 173:12  
 200:15,20 207:10 210:24  
**concede (3)** 81:24 85:15  
 95:13  
**concentrated (1)** 116:10  
 157:3  
**concept (1)** 194:12  
**concern (2)** 61:11 176:8  
**concerned (7)** 6:1,2 8:5,19  
 36:16 82:5 96:1  
**concerns (5)** 65:18  
 208:22,25 209:22 210:7  
**conclude (4)** 33:20 61:9  
 102:16 214:11  
**concludes (2)** 111:22 213:22  
**concluding (1)** 53:24  
**conclusion (1)** 211:24  
**conclusions (1)** 211:22

**concretely (1)** 21:18  
**concur (1)** 57:19  
**concurrently (1)** 24:7  
**conduct (2)** 7:23 12:2  
**conducting (1)** 7:5  
**conference (1)** 156:19  
**confirm (10)** 34:24 39:17  
 40:14 84:14 163:9 173:2  
 177:6 179:11 206:10 207:6  
**confirms (1)** 133:18  
**confront (1)** 62:7  
**confrontation (1)** 89:1  
**confuse (1)** 109:24  
**confused (2)** 42:24 50:21  
**confusion (4)** 57:19,20 105:6  
 154:20  
**conjunction (3)** 39:2 50:23  
 68:1  
**connect (1)** 25:23  
**connected (1)** 10:9  
**conscious (1)** 167:20  
**consequence (2)** 8:12 19:10  
**consequences (1)** 3:23  
**consider (6)** 12:6 48:19,22  
 54:14 69:15 98:22  
**considered (4)** 26:23 58:25  
 131:14 212:19  
**considering (1)** 72:1  
**considers (1)** 11:21  
**consistency (1)** 12:24  
**consistently (1)** 169:13  
**constable (4)** 1:23 5:24  
 27:13 184:16  
**constables (1)** 3:16  
**constabulary (1)** 147:5  
**constant (1)** 3:17  
**constraints (1)** 190:1  
**consult (2)** 32:15 37:21  
**consultation (3)** 51:8 70:4  
 102:25  
**contact (9)** 13:4,6 21:22  
 44:22 78:19 90:23  
 123:20,21 150:15  
**contacted (1)** 51:11  
**contained (4)** 79:10,18 113:3  
 124:16  
**contains (1)** 187:6  
**contemporaneously (1)**  
 45:15  
**content (1)** 146:4  
**contents (3)** 113:9,16 138:15  
**contest (1)** 117:21  
**context (5)** 4:11 29:14 64:23  
 79:9 131:15  
**contingencies (18)**  
 114:5,8,9,14,18,23  
 116:9,21 117:3,9,16  
 123:25 145:9,17 146:24  
 147:13 161:5 169:3  
**contingency (3)** 131:5 167:8  
 196:2  
**continue (2)** 166:14 167:21  
**continued (2)** 118:18 166:11  
**continuing (1)** 28:10  
**contradiction (1)** 31:14  
**contribute (1)** 118:23  
**control (39)** 16:5 20:1,21  
 21:20 22:17 24:21 25:6  
 40:16,20 42:3,7,8,9,21,22  
 55:16 61:10 79:22 88:20  
 92:4,6 94:24 95:6,14 99:5  
 106:20 126:7 144:7 155:6  
 163:21,22 164:12 165:10  
 166:24 196:3,7,8  
 208:10,13  
**convenient (1)** 54:1  
**cooperate (1)** 169:4  
**coordinate (2)** 28:2 166:7  
**coordinated (1)** 169:6  
**coordinating (3)** 154:21  
 173:3,21  
**coordination (2)** 164:15  
 167:4  
**coordinator (2)** 26:2 45:7  
**cope (2)** 62:24 164:21  
**copied (2)** 134:5 203:9

**copies (1)** 149:21  
**copy (6)** 103:15 128:21  
 133:22,23 161:14 186:5  
**core (2)** 160:9 190:19  
**corner (1)** 162:15  
**corners (1)** 6:18  
**corporate (4)** 18:4 176:9  
 177:25 181:7  
**correct (167)** 1:24 2:9 6:4  
 7:3,11 9:3 10:19,23 16:12  
 21:12 24:14,22 26:9 34:20  
 36:17 37:4,7 39:21,24,25  
 40:9 44:1,5 46:10,14,17,20  
 49:24 50:3,8 56:12,23  
 58:20 64:12 65:4 67:15  
 68:18 71:22 72:14 78:5,25  
 79:4,9 86:8,19 87:7 89:16  
 94:14 97:14 107:13  
 113:8,15 114:15 115:16  
 117:7,14,22 118:2,7,21,25  
 119:24 120:18  
 122:6,11,15,19 123:23  
 126:12,14,23 127:11,17  
 128:1 129:7 130:25 133:12  
 135:1,6,13 136:6 137:21  
 138:2,13 139:17 140:25  
 141:3,6,15 144:8,18,23  
 145:6,19,24 146:5 147:11  
 151:25 153:1,













186:25 200:14
secure (5) 120:5 186:10
194:10 199:15 200:16
security (13) 125:5,10,16
175:17 184:10 186:16
197:25 201:15 208:22
209:16,16,22 210:8
see (107) 10:2 19:3,5 20:23
23:23 29:1 38:23,25 39:12
45:20 55:3 56:17,19 60:14
64:2 71:15 72:21 74:22
75:16 76:1 77:4,24 78:11
81:1 87:17,18 93:3,24
95:22,22 98:18 99:14
104:23 106:23 108:23
113:6 123:16 124:17,18
125:23 127:8 130:6,21
131:1,2,4,18 133:14,17
134:4,14 135:10 137:5,11
141:4 143:1 144:19,21
149:12,14 150:2,17 151:10
155:25 160:11,20,24
161:10,13,18 162:13,17
163:4,16 165:22 170:10,21
171:5 172:5,21 173:4
174:24 176:21 177:23
179:21 180:15 181:22
183:21,23 184:14
186:8,24,25 191:20,22
192:16 193:3,5,12,17,23
194:8 196:21 207:20 208:6
211:24 213:11
seeing (3) 74:17 125:25
150:11
seek (4) 123:12 141:9 142:24
196:6
seeking (2) 136:18 143:13
seem (4) 12:23 19:6 22:14
50:18
seemed (2) 21:13 89:17
seems (6) 15:14 20:20 54:24
71:23 101:19 141:20
seen (26) 26:11 27:12 68:12
71:8,14 81:20 84:6,9 85:8
88:6 97:11,11,12 99:22
124:9,23 130:15
132:10,14,16 139:19 155:9
156:4 182:24 192:13
197:11
selected (1) 79:2
selection (1) 86:7
seminar (4) 46:16,18 126:1
154:1
seminars (2) 118:19 119:7
send (17) 56:12 58:7 70:23
73:24,24 74:9,14 75:1 87:8
89:22 93:15 132:23 146:20
170:3,7 198:23 212:8
sending (3) 76:13 105:13
135:25
senior (6) 17:2 32:10,16 45:7
101:22 109:10
sense (5) 8:22 20:20 33:22
67:8 126:4
sensitive (6) 125:24 186:15
208:4 209:1,20 212:12
sensitivity (2) 146:4 178:22
sent (41) 27:15 32:14,17
38:12,15,17 56:14,20
57:2,18 69:12 70:20
73:11,13 74:25 77:12 78:2
79:1 80:6,19 81:19 88:3
100:21 105:2,12 128:19,21
129:1,12 130:7
135:21,23,24 139:22
149:10,24 157:5 160:18
170:4 180:12 188:13
sentence (1) 106:19
separate (16) 10:9 59:25
60:5 67:21 103:23,24
120:3,5,19 124:15 137:13
148:18 151:19 163:8
202:12,23
separated (3) 14:20,23 15:2
september (11) 11:18 180:7
183:13,21 184:15 198:2

209:8 210:5,13 211:19
212:19
sergeant (16) 4:13,15 6:3
46:9 47:11,23 48:10
49:1,6,17 50:16 51:9 52:2
56:21 117:4 161:13
sergeants (1) 3:15
90:18 103:3 111:13 117:20
151:20 154:19 173:17,17
181:14
services (16) 45:2 89:23
90:13 96:23 110:8
147:5,20 149:17 150:19
152:7 171:23 173:16
174:16 193:20 194:17
211:7
session (1) 111:25
sessions (5) 108:15,18
109:3,13 163:19
set (17) 36:1,2 89:17 90:11
92:12,13 96:23 100:18,23
101:3,7 102:21 112:21
120:5 154:14 179:6 187:1
setdown (1) 79:15
sets (3) 100:25 131:10
178:19
setting (3) 131:19 149:19
209:6
settingup (1) 97:4
severe (1) 101:18
sexton (4) 57:2 58:18,23
181:2
sfc (3) 93:7,10,15
sh (1) 190:2
shall (11) 4:23 16:25 17:2
19:14 27:9,17 28:24 35:19
60:16,21 109:11
shant (1) 85:7
share (10) 165:1 169:4
173:10 186:11 194:11
199:15,25 200:1,4 201:14
shared (6) 154:22 155:5
167:16 184:10 195:4
209:23
sharing (5) 36:16 172:14
186:18,19 200:9
sharp (1) 64:8
shed (2) 132:6 135:15
shes (7) 72:3,4 73:1
135:21,23 136:3 141:1
shooting (1) 64:15
shopping (1) 153:9
short (6) 6:5 54:5,10 108:11
167:22,25
shortly (6) 4:15,17 27:23
58:22 59:13 178:8
should (62) 14:17,25 15:2
19:24 23:24 33:20 39:2
42:19 45:4 48:7,21 50:1,17
53:2,6,6 54:24 60:8
61:2,5,12,16 65:6 75:22,25
76:4,7,10 77:3 80:4,17
89:25 90:22 91:5 92:7,9
94:2 95:20 98:9 104:11
113:3,4,6,13 114:8 124:13
125:4 131:8,11 133:4
135:7 155:19 158:16,21
159:1 163:6 166:11 187:3
196:22 204:25 205:24
214:12
shouldnt (3) 23:17 25:25
83:4
show (4) 32:25 76:1,18 83:25
showing (1) 105:16
shown (2) 62:25 160:8
shut (1) 33:22
sic (3) 153:4 192:15 202:2
side (10) 9:4,16 21:25
25:20,22 50:9 87:2
121:12,13 123:24
sight (1) 145:4

sign (3) 74:13 170:22 175:25
signal (1) 166:5
signature (1) 142:14
signed (17) 78:3 126:20
180:4,23 181:2 182:8
183:14 184:14,22 188:14
191:18 192:3 197:9
198:1,16 209:9 211:5
significance (1) 139:21
significant (12) 11:22 12:22
20:25 30:22 35:4 52:6
73:21 78:12,13 117:5
195:20 200:12
significantly (4) 6:7 161:19
182:5 198:7
signing (1) 210:12
signoff (4) 126:21 184:15
190:6,13
signup (1) 181:8
silver (11) 93:14,25 95:20,24
96:4,10 144:7 163:7
164:21 165:15 195:25
similar (13) 19:25 21:14 25:5
42:5 55:15 79:14 80:23
98:22 99:7 100:21 139:10
199:23 200:8
simon (23) 1:7,9,13 72:3
105:7 130:7,12,13,17,18
131:19,21 132:7,8,9,20
133:10,18,19 135:22,23
178:16 215:3
simple (2) 14:9 97:11
since (3) 107:23 118:16
150:24
sincere (1) 214:5
single (3) 50:2,10,11
sir (366) 1:3,15,17
2:13,15,23 3:6,7,13,17
5:18,22 6:11 7:3,19,22
9:20 12:4,13,20,25
13:10,14,16,20,22,24
14:1,5 15:3,5,6,8 17:23
18:9 19:4,8 20:2,5 21:6,23
22:10,13
23:7,10,12,15,16,23,24,25
24:8,14 25:24
26:11,15,19,22 28:6,12
31:4,12,13,18,21,22
32:2,4,6 33:11 34:22 35:2
36:20 37:12,17,20,23
38:3,11,19,22 39:11,20,25
40:5,19,21
41:4,5,11,16,21,23,25
42:25 43:1 44:6 45:18 46:1
47:15,19 48:1,4,13,25
50:13 52:7,12,15,16,17,21
53:5,9,13,15,17,24
54:2,3,21
55:2,5,9,19,20,24
56:1,4,8,12,23 57:3,24
58:5,11,20 59:8,18 60:11
62:14,16,19,21 63:9,18,20
64:3,9,12,20,24 65:4,7,9
66:3,7 67:4,15,17,20,25
68:5,9,23 69:12 70:8,19
71:3,14,22 72:19,25
73:4,15 74:6,10,17,21,23
75:5,10,20,24
76:3,6,11,13,20
77:6,10,14,17,19,23
78:1,7,17,25 79:12
80:18,21 81:5,13,22
82:7,19 83:3,7,21 84:4,11
85:3 87:11,15,19
88:4,15,17,23 89:4
91:14,17 94:5 96:13,18
97:2,6,9 98:2,5,20
99:1,6,11,18
100:6,10,11,17
101:8,15,18,21,24
102:10,13 103:6,24
104:6,22
105:6,10,15,16,20,22
106:7,11 107:1,4,18,23
108:1,4 109:6,21,22
110:4,5,10,14,15,21

111:12,19,21,22,24
112:3,4,9 127:18 131:22
133:16 135:25
136:3,7,10,12,15,17,23
137:1,3 139:9 140:1
141:17,22,24
142:2,4,7,12,17,21 143:25
144:2 146:6,9,15,20,25
160:3,15,19 161:22 162:24
164:23 165:5,18 167:11,23
168:17 171:13 176:19
188:18 189:11,15
196:18,20 205:3,12,19,23
206:5,8 207:4,9
210:3,5,6,15 211:14,15,17
212:22,25 213:4,8,18,24
214:1,7,12,17
sit (13) 40:17 91:10 115:25
116:16 120:6,13,20,24
128:3 148:16 149:1 164:9
207:10
site (15) 74:3 77:7 82:13
120:5,7,12 138:21,25
139:1,2,4,5,14,24,20:12
sitelorce (2) 72:22 133:21
sitrep (1) 165:12
sitreps (3) 165:8 170:3,4
sits (5) 137:14 141:1,5
143:15 205:17
sitting (2) 121:12 213:24
situation (22) 11:7,23 13:13
19:12 27:18 45:19,19
54:18 58:21,22,24 60:8
62:14 99:10 174:15 182:8
185:15 186:20,21 187:7,10
188:7
situational (14) 92:16
165:13,14 170:7 172:15
182:15 193:14 194:9,14
198:19,23 199:1 200:1
212:14
situations (3) 6:22 71:2
173:10
size (1) 62:10
slide (4) 151:14,17 152:9,16
slightly (8) 19:20 45:17
52:21 86:22 89:21 90:16
100:6 157:19
slowly (1) 91:12
small (5) 58:16 115:4 140:5
206:22,24
snapshot (1) 144:15
softly (1) 4:4
solicitor (1) 85:17
solution (1) 166:5
somebody (10) 70:22 73:23
74:7 81:6 83:8 85:22 87:2
93:16 104:7 128:20
someone (11) 1:6 23:8,22
25:16,22 50:11 57:20
115:7 123:15 124:14
125:20
something (32) 19:25 20:3
21:14 23:17 25:5
28:7,20,25 34:6,7 42:9
44:8 48:5 63:5 67:3 73:21
99:7 100:7 103:11 109:23
122:21 125:22 126:2
132:6,7 135:15 150:20
152:4 162:20 183:5 192:20
193:8
sometimes (1) 154:9
somewhere (5) 35:8 41:12
92:1 140:23 180:8
soon (2) 108:7 154:18
sop (37) 2:17 36:19,19
37:3,8,13,14 49:23
50:7,17,18 55:21 58:3
66:14 67:12 68:1,17
72:6,18,23 73:3 80:2,3
86:25 106:18 125:16 126:8
130:16 132:11 134:15
136:14 138:11 139:16
140:18 142:2 145:25
206:10

sops (3) 36:4 122:4 126:25
sort (11) 4:11 22:24 23:2
34:6,11 63:4 93:5 109:24
145:7 150:12 153:8
sorted (1) 31:15
sorting (1) 21:24
sought (1) 129:24
sound (1) 13:3
sounds (1) 92:20
source (4) 9:7 39:24,24
50:10
space (3) 152:18 163:12
164:16
span (1) 168:3
speak (2) 93:7 134:2
speaking (2) 77:12 169:17
specialised (1) 114:2
specialist (12) 29:23 62:11
90:17 103:2 107:21
114:13,17,20 115:14
117:24 124:19 129:11
specific (2) 112:14 125:3
specifically (10) 10:24 36:16
49:18 124:24 127:9 134:23
157:11 162:1 174:25
207:25
spectrum (1) 25:1
spend (1) 39:15
spending (1) 41:6
spend (1) 114:2
spoke (7) 109:16 135:22
140:11 201:5,22 202:7,18
spoken (1) 4:4 18:1
51:12,16 72:4 133:19
134:23 140:9 141:9
144:19,22
spotsloss (1) 166:5
spreadsheet (1) 150:2
square (1) 126:13
staff (25) 3:15 4:14 5:23
22:24 23:4 24:20 55:16
61:7 79:2 87:2 93:21
95:12,14 115:4,5,6
116:3,8,19 125:5 128:9
154:13,23 155:2 164:21
staffed (1) 164:2
staffing (1) 107:11
staffs (1) 87:24
stage (33) 2:1,4,8,10 5:25
7:21 9:18 35:11 39:6 52:10
62:18 104:9 116:22,23
124:19 125:18 135:17
138:18 143:22 155:24
177:8 182:23 184:12 189:3
192:1,4 193:11 196:16
197:11,16 199:6 201:17
209:25
stages (4) 2:24 30:23 43:12
211:8
stamped (4) 139:2,5,8
142:19
standalone (1) 195:15
standard (2) 29:24 43:4
standardisation (2) 34:11,16
standing (3) 34:25 35:3
122:4
stands (4) 40:15,19 41:7,8
start (11) 1:4 4:6 2:7 9:6,11
113:20 122:1 128:8 177:1
201:23 214:12,13
started (4) 27:8 28:9 29:5
31:8
starting (1) 1:3
statement (51) 3:7 29:9,12
34:2 35:25 36:2,21 46:1,2
48:14 69:25 75:11 81:23
82:16,17 103:12,18,23
108:7,9,12 13:20 112:19
113:6,9,13,13,16 114:7,12
119:21 121:22 122:2
126:24 129:24 137:24
138:5,14 140:2 147:3
149:6 168:5 175:16 184:23
187:22 196:14 202:1
205:13 209:9 213:11
statements (3) 5:9 112:13

113:4
states (2) 102:24 131:11
status (2) 109:18 181:23
stay (6) 22:24 30:10 95:1,12
102:11 109:22
stellar (1) 136:18
stenographers (2) 189:12
214:6
step (1) 104:6
stephen (4) 103:9 112:23
113:2 215:8
steve (1) 133:19
stick (1) 43:1
sticking (1) 203:15
stiff (1) 22:25
still (10) 2:10 3:3 7:22 50:22
52:15 80:10 152:9 155:4
174:7 175:13
stood (1) 20:17
storage (1) 169:24
store (2) 181:25 185:12
stored (3) 127:15,24 196:1
storing (1) 122:23
straight (2) 70:24 71:1
straightforward (1) 10:4
strain (1) 4:25
strategic (9) 86:13 94:20
117:17 164:15 167:4
179:23 185:5 188:2 190:16
strategy (2) 117:21 188:24
street (7) 7:24 108:16
strong (5) 16:13 38:3 39:18
43:14,21
strongly (2) 38:6 101:22
structure (1) 187:5
structures (2) 131:15 176:8
struggling (1) 177:8
stuff (3) 27:10 35:7 85:9
subsequent (2) 37:14 91:4
subsequently (2) 139:24
143:11
substance (1) 188:2
substantial (6) 3:22,24 40:4
44:12 55:15 82:4
substantially (3) 54:19 78:21
79:16
substantiated (1) 188:12
successor (1) 145:4
sufficient (2) 108:16 185:7
sugden (4) 134:5,6,8,10
suggest (15) 11:3 19:13
21:13 26:4 29:3 39:20
87:20 89:17 92:2 95:7,10
108:3 134:2 141:12 163:22
suggested (3) 11:4 108:2
133:1
suggesting (2) 43:24 65:5
suggestion (2) 107:14,24
suggestions (1) 138:17
suitable (1) 103:2
suite (2) 144:7 212:2
summarise (1) 168:15
summarising (2) 176:16
199:16
summary (10) 68:7 87:18
88:2 92:19 147:22 162:8
163:3 165:13 176:12
179:21
superintendent (17) 12:13
15:13 26:7 32:15,21 33:9
37:16,21 38:4 39:8 46:8
47:9,14 55:25 115:22
158:23 160:25
superiors (2) 15:4 56:7
supersede (1) 66:23
superseded (2) 143:2 204:14
supersedes (3) 76:8,24,25
supervision (1) 43:18
supplementary (1) 113:12
supply (2) 41:13 83:18
supply (1) 139:6
support (20) 11:20 30:24
31:15 43:14,22 45:9 55:15
93:13 95:24 97:6 106:20
116:8 117:8 152:1,3
162:18 164:2,3 187:15

194:13
supported (2) 30:20 194:11
supporting (1) 169:9
supportive (2) 5:18 65:19
supports (2) 179:23 194:12
supposed (1) 57:23
sure (29) 5:10 9:20 13:7
15:17 19:5 23:2 27:21 48:8
50:20 55:8 67:4 70:3 74:21
92:22 97:11 105:23 119:5
138:6 141:17 144:11 148:4
152:20 159:17 170:3
171:15 198:20,24 205:3,11
surmise (1) 72:11
surprise (3) 145:21 150:14
160:16
suspect (2) 38:6 54:14
suspicion (1) 38:3
suter (1) 41:14
swap (1) 17:7
swifly (4) 81:18 82:24 88:5
92:10
sworn (7) 1:8,9 112:11,22,23
215:3,8
sympathy (1) 66:1
system (33) 21:19 23:22
28:10 38:14 45:13
97:18,23 123:1 128:23
140:20 141:2 142:20
143:16 167:6 169:25
172:22 173:9,10,13,20
174:10,20 175:22 178:1
195:21 198:9 199:1,18
200:15,24 201:24 209:17
210:25
systematic (1) 62:24
systems (15) 72:20 75:17,18
76:18 123:2 164:18 173:1
174:1,3 176:2,10,14
199:25 211:4,9



125:12 126:10  
 127:6,8,10 130:14  
 133:10 159:18 164:9  
 167:17 185:17 190:9  
 192:14  
**teams (1)** 4:8  
**telling (1)** 1:11  
**template (4)** 166:22 185:19  
 187:2 194:1  
**templates (1)** 187:7  
**temporary (1)** 4:16  
**tend (4)** 19:13 39:20 87:20  
 104:6  
**tends (1)** 42:1  
**term (2)** 42:8 55:17  
**terms (62)** 11:1 46:4 50:1  
 60:4 64:11 65:2 67:16  
 79:13,15 86:6 88:18 90:19  
 92:11 94:4 99:12 108:8  
 113:21 114:25 115:19  
 118:8 119:2,17 120:19  
 121:10,20 124:5 130:12  
 135:2,19 136:19 137:17  
 142:22 143:4,4 144:4,10  
 145:7,9,14 146:23 147:12  
 148:6,15 151:6 152:3,8  
 153:20,23 155:8 161:3  
 162:7 163:11 165:12  
 167:12 169:24 172:11  
 173:14 183:17 185:14  
 199:3,20 202:7  
**terrorist (13)** 29:25  
 30:12,18,23 37:25 39:13  
 43:12 49:12 19:89-2  
 107:15 121:5 124:25  
**terry (2)** 6:17 64:13  
**test (9)** 9:8 57:17 162:1  
 172:10 175:23 178:5  
 207:25 208:12  
**tested (4)** 10:1 104:18  
 152:2,4  
**testing (2)** 28:24 115:3  
**testingemergency (1)** 161:11  
**tfc (14)** 91:10 92:5,6,8  
 93:7,12,19 94:20 95:13,23  
 151:22,23 152:1 198:17  
**tfcs (1)** 95:6  
**thank (80)** 32:6 38:22 45:20  
 52:17 54:3 55:20 62:17  
 63:18,20,25 64:4,9 66:8  
 68:14 70:11 73:10 85:23  
 100:4 101:24 102:13 103:6  
 109:20 111:19,21 112:2,5  
 113:19 114:12,25 115:6,13  
 116:2,24 117:2 118:16  
 119:16 127:12 128:10  
 130:15 132:10,25 133:11  
 134:10,14 143:24 144:3,24  
 147:17 149:5 152:8 154:4  
 155:25 157:10 159:3  
 160:3,19 161:8 164:11  
 167:11 179:20 182:24  
 192:8 196:13,20 197:2  
 201:2 206:19 207:1,3  
 209:12 210:6,15 211:13,15  
 213:21,24 214:1,1,18,20  
**thanks (1)** 151:11  
**thats (272)** 1:19,24 2:9,19  
 3:21 6:4 7:3,11,16 8:8  
 10:19,23 11:2 14:11,21  
 16:1,9,12 21:4,12,15,15  
 22:7 24:9,14,19,22 26:9,14  
 27:19,25 29:22 31:9,17  
 34:20 36:5,7,12,17 37:5,7  
 39:20,25 40:9 42:3,23  
 43:1,16 44:1,5 45:21  
 46:10,14,17,23 47:19  
 48:13 49:24 50:3,8,13  
 51:18,22,25 55:9,24  
 56:4,12,23 57:25 64:12  
 66:7 67:15,18,20 68:18,25  
 70:8,11 71:13,22 73:3,7,15  
 75:10 76:3,15 77:13 78:5,7  
 79:4,12 80:15,18 82:2,7  
 83:19 84:14,18 85:7,8,13  
 86:13,19 87:5 89:6,16

90:9,15 91:1,7,24 94:5,14  
 95:22 96:6 97:14 98:15  
 100:3 101:5 102:13,17  
 104:19,25 105:10,20  
 106:14,24 107:13 109:7  
 110:24 111:5 112:19  
 113:8,15 114:15 115:16,18  
 117:7,14,22 118:2,7,21,25  
 119:24 120:18  
 122:6,11,15,19 123:23  
 126:12,14,23 127:2,11,17  
 128:1 129:7 130:25  
 135:1,6,13 136:6,12,25  
 137:10,21 138:2,13 139:17  
 140:4,25 141:3,6,15  
 142:19 143:25  
 144:2,8,18,23 145:6,19,24  
 146:5 147:11 150:25  
 151:25 152:20 153:1,19,22  
 155:22 156:10 161:2  
 162:10,23 163:18,25  
 165:16 166:17  
 167:10,19,21 168:8,14,25  
 169:7,11,14,15,18 170:19  
 171:1,10,24 174:18 176:11  
 177:19 178:2,7,11,18,23  
 179:2 180:6,13,21,25  
 181:4,9,12,16 182:1,10  
 183:7 184:1,3  
 185:11,13,23 186:5  
 191:2,5,7 192:19 194:5  
 195:20 197:18 198:8,14  
 199:17 201:1,2,11  
 202:5,11,25 203:7 205:16  
 207:19 208:11,24  
 210:8,14,20,22 211:1  
 213:3 214:10  
**thematical (1)** 12:18  
**themselves (4)** 9:25 121:8  
 159:23 180:4  
**theory (1)** 163:14  
**thereby (1)** 62:10  
**thered (2)** 20:21 76:17  
**therefore (7)** 39:8 57:1,22  
 64:21 87:16 154:25 212:15  
**theres (32)** 5:9 9:23 26:15  
 31:14 39:4 44:2,10 45:16  
 62:8 65:22 72:6,19 77:24  
 84:1 87:23 91:8 109:16  
 116:12 128:5 136:12  
 148:18 163:14 175:13,19  
 180:15 182:9 186:1 196:18  
 205:17 206:22 207:4  
 213:14  
**theyd (4)** 42:6 63:5 81:10  
 173:22  
**theyre (12)** 26:17 41:17  
 42:13 44:6,7 53:19 92:3  
 106:15 109:10 129:11  
 142:19 158:3  
**theyve (1)** 139:4  
**thing (10)** 18:12 31:20 40:14  
 63:8 101:25 110:1,24  
 111:8,17 142:7  
**thinking (3)** 105:18 133:24  
 152:24  
**third (1)** 163:15  
**thirdly (1)** 164:1  
**thomas (3)** 46:22 59:16,22  
**thompson (1)** 108:16  
**thorough (1)** 143:22  
**though (2)** 188:23 189:1  
**thought (10)** 8:14 11:18  
 18:18 33:24 35:22 50:22  
 86:16 111:14 129:19  
 141:13  
**thread (5)** 71:19 72:14  
 203:4,17 204:3  
**threat (7)** 61:18 62:7,12  
 63:10 101:18 110:22 111:9  
**threatbased (1)** 212:11  
**three (24)** 3:14,20 4:14  
 10:9,21 37:1 42:12 47:1  
 49:10 89:5 96:23,25  
 97:9,18,23 98:14 104:13  
 110:7,7,21 111:6 163:14

193:20 211:6  
**threeyearly (1)** 128:24  
**through (33)** 11:13 33:18  
 36:6 68:19 71:10 82:8  
 85:25 86:14 125:13 128:22  
 129:2 146:11 149:24  
 150:25 151:11 154:5  
 156:15 158:16 161:19  
 162:24 163:4,7 170:11  
 176:18 177:2,20 180:12  
 188:16 189:15 190:8  
 197:10,24 203:18  
**throughout (3)** 34:12 64:17  
 107:12  
**throwing (2)** 53:20 158:5  
**thrown (1)** 158:8  
**thursday (1)** 131:7  
**tie (1)** 152:18  
**tied (1)** 35:20  
**tier (2)** 66:22 67:13  
**tim (1)** 51:12  
**time (95)** 2:13 3:11 6:6 8:11  
 12:20 13:8,18 14:18 15:1  
 19:13,21 26:12 27:9  
 28:1,8,11 31:10 32:20 36:9  
 37:11 38:9 41:6,25 44:15  
 45:13,14 48:2 50:10 52:2  
 61:12 66:25 69:22 70:24  
 71:16,21 78:24 86:1 87:6  
 102:23 108:9 109:13 116:3  
 117:2 119:15 125:17  
 129:23 130:1 133:9 134:25  
 135:9 136:9,16,24  
 137:15,20 138:1,7,9  
 140:17 141:14,20 142:6,11  
 143:10,24 144:12  
 146:14,18,20 147:10  
 150:23 153:12 167:22  
 168:3 169:21 170:4 171:2  
 173:5 176:1,20 178:12  
 182:6 183:14 186:11  
 187:10 189:25 190:7  
 195:10 200:9 206:14 207:9  
 208:17 210:1 213:2,14  
**timed (1)** 56:19  
**times (4)** 13:11 75:3 100:18  
 128:25  
**timing (2)** 17:1 202:6  
**tin (1)** 94:7  
**tirelessly (2)** 107:19,20  
**title (2)** 40:23 49:4  
**titles (1)** 41:2  
**today (19)** 1:4 14:15 40:24  
 48:22 58:8 62:22 70:7  
 112:15 115:18 119:19  
 120:3 124:9 133:5 134:17  
 144:25 156:7 160:18 203:1  
 214:4  
**together (10)** 26:8 38:7  
 67:19 110:8,16 111:6  
 138:12 153:16 168:22  
 196:4  
**told (15)** 5:20,23 7:14 23:1,3  
 56:21 64:10 65:2 70:15  
 82:15 102:17 125:22 135:4  
 156:20 161:3  
**tomorrow (5)** 14:16 100:1  
 159:12,15 214:9  
**too (6)** 14:12 33:17 35:2  
 69:1 83:13 111:14  
**took (10)** 16:24 75:7 96:24  
 97:22 101:10 108:5 137:18  
 188:8 189:2 198:5  
**tool (13)** 151:15 169:8  
 171:22 174:13 179:22  
 181:15,22 183:10 185:10  
 191:11 193:4 199:15  
 212:14  
**toolkit (1)** 193:10  
**tools (2)** 193:20 212:2  
**topic (7)** 60:1 66:9 88:5  
 96:19 147:18 202:6 207:13  
**topics (1)** 66:10  
**total (1)** 3:6  
**touch (7)** 44:23,25 45:7  
 47:23 48:10 69:20 102:14

**touching (1)** 112:17  
**towards (3)** 56:15 62:6  
 184:17  
**track (1)** 170:17  
**tracker (5)** 150:25 151:2,3  
 170:15,17  
**tragedy (2)** 64:13,15  
**trail (9)** 27:12 71:9 73:18  
 74:18 75:15,25 79:24 80:4  
 134:22  
**train (3)** 9:15 11:17 118:10  
**trained (7)** 14:6 61:7 79:17  
 80:4,8 81:15 163:23  
**trainer (1)** 148:1  
**training (122)** 4:19 5:21 6:16  
 7:23 9:4,8,16,18 10:1  
 11:11,15 14:16 17:8  
 27:19,20 34:5,8,10,17  
 59:7,15 79:13,15,23 80:5,7  
 81:21 86:11 96:20,23  
 97:1,4,13,21 99:15,24  
 100:7,9,13,18,19,23  
 101:5,7,9,10 104:18 107:19  
 108:5,21,25 109:3,13,15  
 112:17 117:24  
 118:3,12,13,19 119:2,8  
 121:17 125:8  
 147:20,21,23,25  
 148:1,6,8,9,10,11,12,16,16,18  
 149:7,9,16,17,19,20,22  
 150:1,6,9,12,20 151:8  
 153:12,17,18 155:11,13  
 156:2,12,16 157:2 158:13  
 159:2 163:6,19,21  
 164:6,10,12 166:4 167:13  
 171:20 172:20,24 174:5,8  
 178:9 179:19 180:19  
**transcript (1)** 152:24  
**transfer (1)** 5:2  
**treated (1)** 70:4  
**treating (2)** 61:5,13  
**treatment (1)** 61:6  
**trial (2)** 178:5 182:25  
**tried (3)** 31:25 102:11  
 138:19  
**triparties (1)** 90:1  
**triservice (3)** 97:25 98:13  
 181:24  
**triservices (2)** 149:19 182:7  
**triton (10)** 172:2,7 174:23  
 175:23 178:4,13 179:5  
 180:20 182:24 183:5  
**true (2)** 113:9,16  
**truth (1)** 107:17  
**try (6)** 19:17 33:17 34:11  
 41:24 109:6 157:1  
**trying (11)** 32:19 45:9  
 63:11,17 69:1,1 78:15 99:8  
 100:20 189:15 202:17  
**tuesday (3)** 1:1 47:13 96:14  
**turn (8)** 44:19 59:12 90:2  
 113:5 172:4 174:22  
 196:17,21  
**turning (3)** 70:13 111:18  
 179:20  
**turnout (1)** 92:24  
**today (1)** 149:25  
**twofold (1)** 150:5  
**type (4)** 7:2 126:22 129:11  
 192:17  
**types (1)** 148:18  
**typify (1)** 194:6

U

**uk (1)** 209:18  
**ultimately (2)** 6:8 66:5  
**unable (4)** 190:7 204:20,22  
 206:15  
**unacceptable (3)**  
 15:14,17,23  
**unarmed (18)** 22:23 23:3  
 24:17 86:20,20  
 87:2,13,16,23 88:3 93:21  
 94:23 95:1,12,14,16,17,20  
**unaware (1)** 89:2  
**unclear (1)** 89:24

**underresourced (1)** 14:10  
**underresourcing (6)** 12:7  
 64:5,8,10,22 107:6  
 19:1,4,5,8 22:10 23:4  
 24:12 27:21 31:17 42:23  
 43:16 47:3 48:21 49:6  
 50:18 52:9 55:10 56:5  
 57:22 64:23 69:20 73:15  
 75:5,10 76:9,21 78:17  
 80:12 84:20 86:24 90:4,5,9  
 93:3 98:2 100:8 105:4,23  
 107:4 120:1 125:3 135:25  
 139:18 143:13 144:20  
 148:15 163:22 179:4  
 199:24 206:5,7,22  
**understandably (1)** 43:20  
**understanding (36)** 12:15  
 20:19 21:15 25:8 35:18  
 49:16 51:23 54:23 57:3  
 66:16 67:3 85:2 90:25 91:1  
 96:6 126:4 131:7,21,25  
 133:9 134:21,22  
 137:7,22,24 142:20 170:6  
 183:13 198:14,22 199:17  
 200:12 201:1 208:8,18  
 213:22  
**understatement (1)** 48:24  
**understood (21)** 6:14  
 8:19,20 22:20 37:2 47:9,19  
 50:4 52:1,4 53:11 55:12  
 56:2 59:1 90:20 106:10,22  
 107:1 197:6 198:5,12  
**undertake (1)** 90:22  
**undertaken (2)** 98:16 188:5  
**undertakes (1)** 67:2  
**undertook (1)** 70:16  
**undo (1)** 136:18  
**unfair (1)** 25:16  
**unfortunate (1)** 68:7  
**unified (1)** 50:2  
**uninjured (2)** 60:23 61:10  
**unit (74)** 1:20 2:2,25  
 3:4,5,12 4:2,6,8,12,18 5:17  
 6:13,13 9:10,17 31:23  
 51:13,14 64:5,17,22 71:16  
 82:13,14 87:6 104:8  
 181:18,19  
 114:3,4,5,8,9,10,19,22,24  
 115:4,10,11,18,21  
 116:9,17 117:3,4,24  
 123:8,22,25 126:8,13  
 128:18,19 129:4 130:10  
 131:6,8 133:4 134:9,23  
 135:5 137:19 145:10,17  
 146:24 147:13 156:14  
 161:5,6 170:24 177:12  
 202:13  
**units (2)** 107:21 114:20  
**universal (1)** 181:15  
**unless (8)** 62:19 72:17  
 78:11,13 99:17 174:1  
 186:18 211:4  
**unlike (1)** 155:20  
**unlikely (3)** 95:3,4 151:16  
**unpick (1)** 134:20  
**unreasonably (1)** 71:2  
**unrestricted (2)** 203:19  
 204:7  
**unsatisfactory (1)** 13:15  
**until (13)** 1:23 4:20 11:18  
 85:8 88:20 89:14 186:3  
 188:8 189:25 191:22  
 129:25 130:16,16 132:11  
 133:20,24,25 134:16  
 135:11 136:1,12,24  
 137:5,11,15 138:9,11,17  
 139:16 140:8,15,18,23  
 142:2 143:15,20 144:5  
 145:5,16 149:16 186:3  
 201:5,8 203:22  
 204:6,13,18,20,22 206:10  
**versions (6)** 81:16 102:7  
 126:8 136:14 156:4 206:3  
**via (5)** 52:23 93:15 133:21  
 159:2 189:24  
**vice (1)** 165:15

**video (1)** 214:14  
**viewed (1)** 87:9  
**views (1)** 147:3  
**visit (4)** 18:16 29:18 37:18  
 59:19  
**void (1)** 196:7  
**volunteered (1)** 60:1

---

**W**

**wait (3)** 29:2 159:13,14  
**waited (1)** 19:20  
**wanting (2)** 152:17 177:4  
**warm (5)** 60:25 61:14,23  
 62:10 94:11  
**wasnt (1)** 20:15 52:12,16  
 55:23 64:7,19 76:19 92:21  
 118:11 137:16 142:5,13  
 160:7 171:4 186:3 188:11  
 189:6 190:4 194:19 206:11  
 209:9  
**way (50)** 8:7 9:10 12:23  
 17:12 19:7 22:20 23:7  
 27:10,13 28:9 29:7 32:2  
 35:24 45:1 48:14 53:3  
 57:25 59:1 62:1,8 72:25  
 75:5 79:5 86:14,24 90:3,5  
 93:3,19 94:3 96:16 98:2  
 99:10 114:16 126:25  
 128:18 143:5 144:13,15  
 147:22 153:9 160:24  
 168:11 171:22 172:24  
 173:24 178:21 181:6  
 198:15 199:16  
**ways (1)** 186:18  
**weatherby (27)** 56:16 57:12  
 63:22,24 64:1,2  
 83:7,13,17,24 91:18  
 98:8,11 99:20 100:3  
 196:25 197:1,2,4  
 205:3,19,23 206:9,19  
 207:2 215:5,10  
**webbased (2)** 186:10 199:15  
**website (1)** 41:14  
**wed (5)** 32:25 51:12 206:8  
 213:8,18  
**wednesday (2)** 160:22  
 214:23  
**week (4)** 28:19 131:7 151:4  
 213:16  
**weekend (1)** 151:5  
**weekly (3)** 152:2,4,6  
**weeks (2)** 48:16 58:7  
**went (17)** 3:13 4:16 5:4,24  
 27:12 36:6 86:9 87:10  
 111:15 125:8 126:1  
 129:15,18 156:19 166:10  
 197:24 205:5  
**werent (6)** 70:15 86:4 88:8  
 142:9 176:24 198:24  
**westminster (1)** 71:11  
**weve (33)** 17:24 26:11,23  
 33:12,15 48:8 49:17 58:25  
 59:10,22 68:19 72:1 79:2  
 81:20 84:13 85:14,20  
 96:20 97:1 116:4 124:9,22  
 150:15 155:9 166:19  
 167:20 182:24 183:4  
 197:10 203:2 204:11,17  
 214:19  
**whatever (8)** 23:3 60:22  
 72:13,15 98:12 111:12  
 120:11 200:4  
**whats (6)** 90:15 93:8 105:9  
 107:2 111:9 202:25  
**wheres (5)** 5:23 15:24  
 45:12 200:15,24  
**whereby (1)** 35:11  
**whilst (6)** 6:19 12:10 54:22  
 169:22 212:6  
**whittle (72)** 3:22 4:21 6:3  
 10:6 11:11 16:11,17,22  
 18:14,18,24 21:23 23:5,12  
 32:7

58:2 59:2 62:9,21 66:15,17  
67:5 75:13 77:12 85:10  
87:21 88:6 89:17 91:8  
92:14,21 96:21,24  
100:7,8,20 101:3,25  
104:20 105:1,24 145:21  
147:24 149:11,12,15,21  
152:9 156:2,5 157:20  
**whittles (10)** 37:13 66:15  
74:24 86:6 90:20 92:15  
98:16 104:14 153:7 155:15  
**whoever (1)** 19:21  
**whole (17)** 4:19 19:14 22:21  
24:4 25:11 40:3 41:6  
47:5,6 64:17 92:23 100:18  
111:17 146:11 155:20  
159:18 180:20  
**wholl (1)** 56:16  
**whom (6)** 11:22 12:15 25:13  
32:8 44:3 76:2  
**whos (6)** 48:4 53:21 83:21  
158:6 159:11 196:23  
**whose (5)** 25:4 53:17 93:15  
102:20 157:25  
**wider (4)** 148:22 157:2  
184:19 192:15  
**wife (1)** 41:21  
**wifi (1)** 195:16  
**winchester (29)** 52:11,19  
53:4 99:3 100:12 150:21  
151:8 155:11 156:13,16  
157:15,16 158:13,25  
159:17,18 160:13,22  
161:15 162:14  
170:10,16,18,22 171:5,11  
172:1 207:14,21  
**wish (7)** 4:10 59:23 60:24  
61:21 188:19 196:19  
213:19  
**wished (1)** 206:24  
**wishes (1)** 211:18  
**witness (42)** 1:6 5:9 48:14  
53:25 83:14,20 103:17,22  
108:6,9,12,13,20  
112:10,13,19,19 113:4,12  
114:6,12 119:21 121:21  
122:2 126:24 129:24  
136:17 137:24 138:5,14  
140:2 146:23 149:6 160:8  
168:5 184:23 187:22  
205:12 211:19  
213:11,16,25  
**witnesses (1)** 91:19  
**witness (2)** 112:15 160:7  
**wondering (3)** 31:13 63:2  
103:12  
**wont (9)** 5:13 39:17 41:9  
86:1 96:17,21 108:22  
198:4,11  
**worded (1)** 101:22  
**work (53)** 4:25 15:16,25  
20:11 22:17,18 23:9,22  
26:16 28:25 31:8 32:19  
40:18 45:6 51:24 66:5  
78:18 98:5,15 99:1,23  
110:3 121:13 125:4 136:19  
143:4 145:10,18 162:2,3,3  
163:3 168:22 170:11 173:6  
176:9 179:14 181:6 187:15  
188:6,12,16,24 190:5,8  
191:6,19,19 208:1,2,2  
210:16 212:22  
**workable (1)** 16:24  
**worked (7)** 31:10 32:2 63:10  
72:17 107:15 116:13  
181:11  
**working (20)** 13:18 16:6 23:5  
27:8 30:7 31:14 41:7 53:12  
65:16 96:18 110:13 117:11  
134:25 148:3 149:2 152:5  
169:10 192:5,9 210:19  
**workload (1)** 30:16  
**works (2)** 73:23 163:22  
**worksheets (1)** 19:18  
**workstream (3)** 175:18 192:5  
198:10

**worn (1)** 214:3  
**wouldnt (18)** 51:20 67:8  
80:7,9 93:23 101:11  
124:17,18 145:12 147:16  
150:14 155:14 197:11  
200:25 201:17,19  
206:17,18  
**wriggle (2)** 94:3 109:17  
**wright (15)** 72:3  
130:7,12,13,17,18 131:19  
132:9,20 133:10,18,19  
135:2,7,22  
**wrights (1)** 137:19  
**write (3)** 69:25 70:9 152:25  
**writing (4)** 118:5 119:10  
209:11 210:1  
**written (4)** 74:15,17 84:5  
106:5  
**wrong (9)** 25:24 26:6 40:8  
42:25 57:18 72:14 90:4  
102:5 106:4  
**wrote (3)** 32:14 175:24  
211:24

---

**yeah (1)** 152:14  
**year (16)** 4:16,18 29:2 69:25  
100:18,22 101:2,4,6,10  
108:22 113:7,14 140:12  
160:23 194:19  
**yearly (2)** 73:20 128:24  
**years (10)** 1:16,18 3:13,19  
4:7,15 70:1 107:11 114:2  
198:5  
**yesterday (42)** 1:7 3:22 4:22  
10:6 17:25 22:23 26:20  
29:9 36:23 38:23 40:22,24  
43:7 49:8,25 50:21 52:21  
55:14 56:17,21 57:5,12  
60:1,13 61:20 66:20 67:5,6  
84:9 97:1 98:8 100:21  
111:2 115:19 119:19  
157:19 178:17 187:14,21  
188:8 191:4 204:12  
**yet (3)** 18:23 21:4 80:10  
**you'd (15)** 27:22 32:20 44:4  
79:2 83:22 105:13 132:14  
152:8 174:7 178:16 191:22  
192:9 195:5 200:13,24  
**you'll (7)** 2:17 5:8,12 12:5  
44:11 54:14 136:13  
**you're (47)** 4:3 6:8 14:18  
15:22 16:7 19:4,8 23:4  
24:23 25:22 27:22 31:5  
37:10 41:6 50:19,25 58:9  
63:21 76:9,12,18 78:11  
81:11,14 82:5 84:16 87:5  
96:1,15,17 101:20 107:4  
119:5,6 125:19 126:25  
144:25 159:14 171:13  
177:23 180:1 189:12,15  
201:12 204:20,22 206:15  
**yourself (1)** 132:1  
**youtube (1)** 41:17  
**youve (46)** 5:8,10 8:12 12:10  
18:1,12 23:13 34:23 36:23  
40:23 45:24 46:3 54:15  
55:12 58:14 64:4,10  
68:6,12 70:15 71:6 75:14  
82:15,15 97:11 102:20  
107:1,5 118:13 119:3  
130:8 139:13 142:23 151:6  
158:8,9 160:16 161:3  
180:22 199:13 200:1 201:8  
203:24 204:2 208:21  
211:22

---

**zone (6)** 60:9,10  
62:7,10,11,15  
**zones (4)** 60:25 61:14,24  
111:10  
**zoom (1)** 207:21

---

**0**

**0239 (3)** 139:15,25 201:9  
**0857 (1)** 131:3

---

**1**

**1 (15)** 24:3 97:17 113:6  
117:11 136:14 137:15  
150:16 163:5 169:17  
183:23 193:7,17,21  
215:3,4  
**10 (7)** 39:7 102:16 165:7  
177:21 207:8 214:15,16  
**100 (4)** 67:4 84:4 159:17  
205:11  
**1000 (2)** 214:12,22  
**1015 (1)** 1:2  
**102 (1)** 215:6  
**1030 (1)** 58:22  
**11 (2)** 160:23 165:17  
**110 (9)** 37:6 39:22 51:19  
58:3 67:12 69:8 72:1 83:18  
136:23  
**112 (2)** 215:8,9  
**1128 (1)** 54:4  
**1145 (1)** 54:6  
**118 (1)** 112:6  
**12 (15)** 36:22,24,25  
56:5,11,19 68:3 70:7 80:23  
81:20 82:6 86:9 104:12  
165:19,24  
**12th (2)** 59:3 75:1  
**13 (2)** 136:7 166:3  
**1358 (1)** 56:19  
**14 (26)** 71:25 134:16  
136:2,3,16 137:5,11  
138:11 139:16,23  
140:8,15,18,23 142:8  
143:15,20 144:5 145:5  
146:12 166:6 201:5,8  
203:22 204:6 205:4  
**15 (9)** 29:13 34:3 136:10  
140:11 166:9 167:20  
189:6,18 213:13  
**16 (1)** 166:13  
**17 (6)** 161:12,24,25 162:17  
166:19 207:23  
**18 (2)** 113:14 166:21  
**19 (4)** 39:21 59:20 137:16  
167:7  
**197 (1)** 215:10  
**1993 (1)** 113:25

---

**2**

**2 (34)** 3:8 4:7 17:8 24:3 36:1  
39:5 47:13 51:20 66:14,18  
68:20 69:5,7 74:24 76:25  
79:1 80:10 81:18 84:18  
86:6 88:7,16,19 102:2  
113:14 136:14 163:20  
169:17 172:22 174:24  
175:5 184:24 193:21,23  
**20 (4)** 1:16 84:22 85:21  
149:15  
**2003 (1)** 1:21  
**2004 (1)** 117:9  
**2005 (1)** 1:23  
**2007 (2)** 168:13,19  
**2008 (2)** 64:18 114:3  
**20102011 (1)** 107:8  
**2011 (1)** 29:21  
**2012 (13)** 1:25  
2:8,10,11,21,25 3:1,3,19  
7:2 34:24 64:15 127:9  
**201314 (1)** 4:2  
**2014 (11)** 5:17 6:1 7:20  
12:1,19 15:1 39:15  
168:11,17,18 197:20  
**2015 (3)** 5:19 119:13 188:25  
**2016 (47)** 17:17,17 18:5,6,23  
29:15 30:4 31:7 37:16,24  
38:21 39:6 46:6 60:6,19  
80:11 81:7 83:16 84:22  
85:21 115:11 137:10 147:9  
149:13,15 154:2 160:22  
171:6 172:5 175:12,19  
176:22 177:2,11 178:4

180:8 183:21 184:15,24  
190:6 198:2 207:17 209:8  
210:5,13 211:19 212:20  
**20162017 (1)** 191:9  
**2016early (1)** 185:17  
**2017 (69)** 5:1,5 12:2,19 15:1  
16:8 17:15 18:2,7,24 20:11  
21:18 32:12 36:25 37:14  
46:7,16 47:13,21 56:11  
59:17,20 64:18 71:11  
85:19 96:20,25 97:7 98:18  
99:25 103:9 108:6 115:9  
116:3 121:24 123:17  
127:10 130:2,7,24 131:3,7  
138:3,8,10,16,20  
139:15,20 141:5 145:22  
147:21 149:9 169:22  
170:12 171:7,17 175:13  
185:17 186:2,3 188:25  
189:4,6,18 190:24 191:22  
211:6 213:13  
**20172018 (1)** 107:8  
**2018 (1)** 194:21  
**2020 (1)** 188:16  
**2021 (3)** 1:1 142:24 214:23  
**207 (1)** 215:11  
**21 (3)** 98:17 149:13 186:25  
**211 (1)** 215:12  
**215 (1)** 112:3  
**218 (1)** 112:8  
**22 (18)** 1:18 20:1 22:8 25:7  
58:19,24 81:21 82:1,11  
89:10 102:4 110:18 130:2  
138:8,10,20 146:18 171:14  
**23 (8)** 1:1 131:7  
139:15,20,25 141:5 143:16  
204:11  
**23rd (1)** 201:9  
**24 (1)** 214:23  
**25 (4)** 2:21 60:20 82:16  
137:10  
**27 (1)** 152:16  
**28 (4)** 130:7 131:3,19 210:5  
**29 (2)** 103:9 205:15

---

**3**

**3 (24)** 15:11 17:9,17 24:3  
27:7,23 39:7 46:6  
60:2,6,19 69:25 84:10,18  
102:23 109:16 124:23  
132:11 136:14 145:1,1,16  
152:12 207:20  
**30 (1)** 184:15  
**300 (4)** 119:23 122:16  
128:5,22  
**32614 (1)** 188:22  
**32616 (1)** 190:15  
**328 (1)** 167:24  
**348 (1)** 168:1  
**36 (1)** 170:21  
**3hour (2)** 101:1,9

---

**4**

**4 (26)** 32:12 35:25 36:23  
37:14 48:16 66:15  
67:10,23,24 70:1 81:10  
84:10 97:7 104:14,20  
105:25 113:7 130:16  
136:1,14 164:5 177:21  
178:19 186:7 198:5 201:9  
**44 (2)** 46:1 92:14  
**457 (1)** 214:21  
**46 (2)** 47:3 170:21  
**47 (33)** 2:17 29:25 35:5  
36:19 37:8,13,14 43:4  
49:13,23 50:7,17,18,22  
55:21 58:3 66:14 67:12  
68:1,17 72:6,18,23 73:3  
80:2,3 106:18 130:16  
132:11 136:14 142:2  
145:25 206:10  
**48 (1)** 102:23  
**4b (1)** 36:2

---

**5**

**5 (49)** 27:16 29:16 30:3 37:9  
39:15 43:3 45:21 47:21  
49:1 55:13 58:4 66:13,24  
67:11,12 68:15,17 69:4,8  
70:13,14,16 72:18,23 73:8  
74:20 76:17,25 77:4,6,15  
80:2,11 81:10,15 82:15,17  
98:21 99:22 106:18  
136:12,14 142:2 161:11  
164:11 178:15 189:10,21  
206:10  
**500mb (1)** 75:20  
**54 (1)** 75:11  
**57 (1)** 36:21  
**5th (3)** 32:17 74:25 75:1

---

**6**

**6 (8)** 28:19 43:3,4 46:7  
109:16 114:2 164:20  
181:19  
**61 (1)** 29:10  
**64 (1)** 215:5  
**66 (4)** 60:15,19,21 61:21  
**6hour (2)** 100:25 101:9

---

**7**

**7 (7)** 39:14 107:11 160:22  
161:20,23 164:23 207:17  
**70 (1)** 108:13  
**71 (1)** 108:20  
**713 (1)** 131:20  
**72 (1)** 108:21  
**74 (1)** 107:10  
**77 (1)** 188:20

---

**8**

**8 (5)** 59:17 151:14 161:16  
164:24 189:3  
**84 (1)** 180:8  
**8month (1)** 188:23

---

**9**

**9 (9)** 34:3 46:2 112:14 122:2  
151:17 160:23 162:13  
165:2 176:22  
**9095 (1)** 16:6  
**930 (1)** 214:13  
**99 (1)** 180:16