

OPUS2

Manchester Arena Inquiry

Day 67

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Wednesday, 24 February 2021

(10.00 am)

MR GREANEY: Sir, good morning. The witness for today is retired Inspector June Roby, about whom we've heard reference during the course of the week. For good reason, she is joining us by a live link and I'm going to ask her to turn on her camera, please, and she can then be sworn.

MS JUNE ROBY (affirmed)

Questions from MR GREANEY

MR GREANEY: Good morning, Ms Roby. Can I begin by checking that you're able to both see and hear me?

A. Yes, I can, thank you.

Q. As you will appreciate, it is more difficult to ask questions and to answer them by this means than if you're in the room, so we'll all just have to bear with each other.

I'm going to begin by asking to you tell us your full name, please.

A. June Roby.

Q. Ms Roby, did you retire from Greater Manchester Police on 15 February 2017?

A. I did, that's correct.

Q. At that stage were you an inspector?

A. Yes, I was.

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Q. What I'm going to do, just for your benefit and the benefit of others, is to identify the five topics that I'm going to address with you over the course of the next, I hope, no more than 1 hour and 15 minutes.

First, your career and background. Second, what we know as SOP 47 v3, so the third version of GMP's internal policy and plan relating to MTFAs. Third, your participation in the Greater Manchester Resilience Forum and GMP's participation more generally. Fourth, Exercise Winchester Accord. And fifth, Exercise Sherman.

A. Thank you.

Q. So let's deal with those in order and first your career and background.

Did you join Greater Manchester Police in 1987?

A. I did, 16 February.

Q. So it follows that you served very nearly 30 years as an officer?

A. I served 30 years as an officer, yes.

Q. As a constable, were you trained in the HOLMES computer system?

A. Yes, I was.

Q. And in the operation of casualty bureau systems?

A. That's correct.

Q. In 1995 were you promoted to the rank of sergeant?

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A. Yes, I was.

Q. Did you then undertake patrol sergeant and custody office roles?

A. Yes, I did, at Salford.

Q. Between 15 and 18 June of 1996 were you the casualty bureau supervisor during the period that followed the bombing of Manchester by the IRA?

A. Yes, I was.

Q. And indeed, were you the casualty bureau room manager during the final days of the response to that incident?

A. That's correct, yes.

Q. Would you describe, please, in just a few sentences what a casualty bureau is, please?

A. Yes. So at the event of a major incident, a number, telephone number, will be given to the public to allow them to ring in to report people missing or with any concerns that they have. The casualty bureau operators are on the other end of that telephone line, logging all the calls and logging missing persons. In the unfortunate event that there are bodies or dismembered bodies, they would log those, the description of those bodies, body parts, et cetera. It's a system that pulls together all the information we have from the scene of a major incident, be that a bomb or the cockle pickers at Morecambe Bay.

3

Q. From 1998 to 2000, did you work within the operational communications branch or OCB?

A. I did, yes.

Q. We don't need to know, and indeed you shouldn't say where precisely that was located, although I think it was in a number of locations, but were you in that role part of a team of three supervisors?

A. That's correct.

Q. Were you together responsible for 80 members of staff?

A. There or thereabouts, yes.

Q. Whilst working in the operational communications branch, the OCB, what were your responsibilities?

A. We were concerned with calls as they came into the police. We also had the motorway communications and the switchboard in the room that I was working in. So we were essentially the first commanders of any sort of an incident. We ensured that the incident got resourced properly and that it was dealt with properly and closed properly.

Q. In that role, was it of a high degree of importance that you should understand the contents of the major incident plans?

A. (Inaudible: distorted) probably the people that had the easiest access to them at the beginning of an incident. We were sat in front of computers, the emergency plans

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1 were on our computers, so we could access them and
 2 direct staff according to the plan.
 3 Q. I just missed the beginning of that answer, but I think
 4 you were agreeing that it was important in your role
 5 in the OCB that you should understand the contents of
 6 major incident plans?
 7 A. Yes, that's correct.
 8 Q. Was it also important that you should understand the
 9 roles that your staff should be expected to perform in
 10 accordance with those plans?
 11 A. Yes.
 12 Q. And important that the members of staff should
 13 themselves understand what their roles were?
 14 A. Yes.
 15 Q. The inquiry is now familiar with the term "force duty
 16 officer" or FDO. In your role within the OCB did you
 17 need to understand what the role of the FDO was?
 18 A. Yes, so that we could support them correctly.
 19 Q. Indeed, the way in which you put it in your statement is
 20 this, paragraph 5, statement 1:
 21 "I needed to understand the role of the force duty
 22 officer so that I could ensure they were supported and
 23 informed at all relevant stages of a major incident."
 24 Is that correct?
 25 A. That's correct, yes.

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1 Q. You add that it was at this time that you became aware
 2 of the massive responsibilities placed on the shoulders
 3 of FDOs. So let me ask you --
 4 A. That's correct.
 5 Q. When you say "at this time", are you talking about the
 6 period between 1998 and 2000?
 7 A. Yes. I started to look more closely at the major
 8 incident plans at that point in time, because, as I say,
 9 we were responsible for the first responders to any sort
 10 of an incident.
 11 Q. So it would seem --
 12 SIR JOHN SAUNDERS: Tell me the date again.
 13 MR GREANEY: 1998 to 2000, sir.
 14 So it would seem therefore, for a period of
 15 approaching 20 years and prior to the arena attack, you
 16 were aware of the massive responsibilities on the
 17 shoulders of FDOs?
 18 A. Yes, that's fair to say.
 19 Q. I don't mean that in a way that is critical of you, but
 20 would it be fair to say that if you were aware of those
 21 responsibilities over that period of time, you would
 22 expect others within GMP also to have been aware of that
 23 fact?
 24 A. Yes.
 25 Q. When you say "massive responsibilities", your phrase,

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1 what do you mean by that?
 2 A. They were the first incident commander essentially at
 3 any major incident and that's a big responsibility on
 4 its own. But they also had the responsibility to
 5 arrange the turnout of certain units, to inform other
 6 people all the time, keeping a handle on what was going
 7 on at the incident.
 8 Q. As you'll appreciate, we're going to come back to the
 9 role of the FDO in later phases of your evidence, but
 10 let's just park that for the time being.
 11 In early 2000 did you move to the Wigan division?
 12 A. Yes, I did.
 13 Q. And then in late 2001 did you become a temporary
 14 inspector in charge of the Leigh area?
 15 A. That's correct.
 16 Q. Then in April of 2002 were you promoted to the
 17 substantive role of inspector?
 18 A. Yes, that's correct.
 19 Q. Did you then work within the promotion assessment centre
 20 until 2005?
 21 A. Yes.
 22 Q. Where did you move in 2005?
 23 A. Back to Wigan, I think.
 24 Q. Yes, I think that --
 25 A. Yes, back to Wigan.

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1 Q. In July of 2008 did you move to a unit that is of
 2 greater interest to this inquiry?
 3 A. Yes, I did.
 4 Q. To which unit did you move?
 5 A. At the time it was called the Resilience Development
 6 Unit. It sat within specialist operations.
 7 Q. Did that unit come to be known by a different
 8 description in due course?
 9 A. It did, as it took on more responsibilities.
 10 Q. What did it become called?
 11 A. The Civil Contingencies and Resilience Unit.
 12 Q. Whatever that unit was called, what were its
 13 responsibilities?
 14 A. Initially, the responsibilities were about training and
 15 exercising against emergency plans in a multi-agency
 16 environment, so ensuring that GMP staff and multi-agency
 17 staff were trained and exercised and understood their
 18 roles in a major incident.
 19 Q. So from 2008, were you and your staff involved in
 20 devising and facilitating multi-agency exercises across
 21 Greater Manchester?
 22 A. That's correct.
 23 Q. I'm now at paragraph 9 of your first witness statement
 24 if you're following this with me.
 25 Between 2008 and 2017 did your role within that unit

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1 change?
 2 A. It did, yes. When I joined the operational planning
 3 department, there were two chief inspectors, three
 4 inspectors and five or six sergeants, I can't remember
 5 the exact number. Within my department, the Resilience
 6 Development Unit, we had a chief inspector, myself, two
 7 sergeants, four PCs and a member of police staff.
 8 The budget cuts meant that the operational planning
 9 department lost a chief inspector, an inspector, and
 10 a couple of sergeants, and my unit then merged with
 11 what was previously the emergency planning unit and we
 12 took on board the writing and updating of emergency
 13 plans as well as the testing and exercising.
 14 Q. To put that in simple terms, not that you failed to do
 15 so, does it follow that budgetary cuts within GMP
 16 resulted in a reduction of staff in the area in which
 17 you worked?
 18 A. That's correct.
 19 Q. And a consequent increase in the responsibilities that
 20 fell upon you?
 21 A. That's correct.
 22 Q. As a result, one of the responsibilities that you came
 23 under was the writing of emergency response plans for
 24 GMP; is that correct?
 25 A. That's correct.

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1 Q. Were you in addition to those responsibilities given
 2 a role within what we understand is the
 3 Greater Manchester Resilience Forum?
 4 A. Yes, I had that role previously as well in the
 5 Resilience Development Unit.
 6 Q. What was your particular role within the GMRF, the
 7 Greater Manchester Resilience Forum?
 8 A. I became the chair of the training and exercise
 9 coordination group and a regular member of the
 10 Resilience Development Group.
 11 Q. The Resilience Forum Training and Exercise Coordination
 12 Group was commonly known, am I right, by the acronym
 13 TEGG?
 14 A. That's correct, yes.
 15 SIR JOHN SAUNDERS: But we won't call it that here!
 16 MR GREANEY: I wouldn't dream of calling it that,
 17 particularly if your wife is watching!
 18 SIR JOHN SAUNDERS: She isn't.
 19 MR GREANEY: Was the Training and Exercise Coordination
 20 Group responsible for the training and exercising of
 21 multi-agency staff in relation to their roles and
 22 responsibilities within various plans?
 23 A. Yes, it was.
 24 Q. As you've told us, I'm now at paragraph 10, page 3,
 25 you were a core member of the Resilience Development

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1 Group; is that correct?
 2 A. That's correct, yes.
 3 Q. And also you were an attender at the GMRF meetings, the
 4 resilience forum meetings, at which you acted as an
 5 adviser to the GMP senior officer in attendance; is that
 6 correct?
 7 A. That's correct, yes.
 8 Q. As I indicated earlier, the third topic I'll deal with
 9 with you is the participation of GMP in the Resilience
 10 Forum.
 11 Were you in addition, during that period we're
 12 dealing with, 2008 to 2017, the main specialist
 13 operations department liaison with the North-west
 14 Counter-terrorism Unit Emergency Planning Department?
 15 A. I was, yes.
 16 Q. And did you participate in weekly national
 17 counter-terrorism meetings?
 18 A. I have said weekly in my statement. I think actually,
 19 on reflection, every other week, so the SRC meetings.
 20 Q. So every fortnight in other words?
 21 A. I think so, yes.
 22 Q. And did you also attend emergency meetings that might be
 23 called in relation to any increase in the terrorism
 24 threat level?
 25 A. Yes, regularly at that point in time.

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1 Q. Did your department devise the GMP response to increases
 2 in threat level?
 3 A. We did.
 4 Q. And liaise with partners in other emergency services in
 5 respect of any response required from them?
 6 A. That's correct.
 7 Q. That deals with the first topic and I'm going to turn
 8 next to deal with standard operating procedure 47
 9 version 3.
 10 As you've explained, you became responsible for
 11 writing emergency response plans for GMP at some stage
 12 between 2008 and 2017.
 13 A. That's correct.
 14 Q. Are you able to be more specific about the point during
 15 that period that you assumed that responsibility?
 16 A. I think it was possibly 2011/2012, round about that
 17 time. It was when we moved to the new force
 18 headquarters.
 19 Q. Did you receive any training in the preparation of
 20 emergency response plans?
 21 A. I attended a number of courses at the Emergency Planning
 22 College at Easingwold, yes. I think they're listed in
 23 my Sherman statement.
 24 Q. Did you receive any training in what we know as MTFAs,
 25 marauding terrorist firearms attacks?

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1 SIR JOHN SAUNDERS: I think that was a no.
 2 A. Apologies, yes.
 3 MR GREANEY: It's not your fault, it's the link, which is
 4 not perfect.
 5 Did you have any operational experience of firearms
 6 operations?
 7 A. None whatsoever, no.
 8 Q. Or any training as a firearms officer?
 9 A. No, I didn't.
 10 Q. Again, I wouldn't want you to understand that I'm
 11 criticising you, I'm simply trying to establish the
 12 context for the questions I'm going to ask you about
 13 SOP 47.
 14 I'm going to ask that we look together, please, at
 15 version 5 of standard operating procedure 47. I know
 16 that you're familiar with what SOP 47 is.
 17 Could we go, please --
 18 A. I am.
 19 Q. We've seen this a number of times in the last few days,
 20 probably too many times, but we'll put it on the screen
 21 one last time. {INQ039970/1}.
 22 Can you see that on your screen, Ms Roby?
 23 A. Thank you, yes.
 24 Q. We can see that this version was prepared by
 25 Superintendent Giladi and we don't need to go into with

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1 you --
 2 SIR JOHN SAUNDERS: It says it was prepared by
 3 Inspector Fitton, actually.
 4 MR GREANEY: It was authored by Inspector Fitton --
 5 SIR JOHN SAUNDERS: And reviewed by Giladi.
 6 MR GREANEY: And reviewed by Superintendent Giladi who made
 7 amendments to it. That's the better way of putting it,
 8 sir, I agree.
 9 Can we go to {INQ039970/2}, where we'll see
 10 a version history. Could we enlarge the top half of
 11 that page?
 12 As the chairman has just pointed out, the first
 13 version was authored by Inspector Fitton, who, as we've
 14 understood it, was a firearms unit officer.
 15 The second version, version 2, was the product of
 16 work by Inspector Nutter, who we understand was an
 17 experienced firearms officer.
 18 Then can you see, Ms Roby, that version 3 was the
 19 product of an update in April 2013 and you are said
 20 there to have been the person responsible for that
 21 update. Are you able to see that?
 22 A. Mm--hm. I can, thank you, yes.
 23 Q. It may be in the overall chain of things a small point,
 24 but version 3 has not been located within any database
 25 of Greater Manchester Police. Are you able to cast any

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1 light on where that version is?
 2 A. None whatsoever, no. I would have emailed it back to
 3 whoever sent it to me and I wouldn't have kept any copy
 4 of it because it wasn't an authorised, verified plan.
 5 So I wouldn't have kept any copies, but it would have
 6 been on my email back to whoever sent it to me to
 7 review.
 8 Q. You just said it wouldn't have been -- I think you said
 9 an authorised plan? What do you mean by that?
 10 A. Well, at the point that I had it, I would have sent it
 11 back and it would have then been viewed by somebody else
 12 and approved, so Mr Giladi or whoever was in charge at
 13 that point in time. So at the point in time that I had
 14 it and returned it to the firearms department it
 15 wouldn't have been an approved plan and could quite
 16 easily have had other updates made. We didn't keep
 17 plans that weren't approved and published on our
 18 databases because there would be too much confusion, too
 19 much danger of someone picking up an unapproved plan.
 20 Q. I think I've understood what you mean. It may be you're
 21 describing to us something very similar to that which
 22 was described by Mr Lear yesterday. As an inspector, it
 23 wouldn't be -- you wouldn't have the authority to
 24 approve a plan for GMP; is that correct?
 25 A. Not that sort of a plan, no. In actual fact, no,

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1 because any other plans that we wrote were always sent
 2 to a superintendent to approve before we published them.
 3 Q. So the point you're making is that you would have sent
 4 it to Superintendent Giladi, or whichever officer of
 5 superintendent rank held his post in April of 2013, for
 6 him to approve or not approve as he considered
 7 appropriate?
 8 A. No, it's more likely that I would have sent it to the
 9 inspector who was in charge of the firearms policy unit
 10 at that point in time, just in case he needed -- he had
 11 any other amendments to make and then he would have sent
 12 it to Mr Giladi or whoever was in charge for approval.
 13 Q. So that's clear and, if I may say so, makes sense.
 14 Do you remember updating that policy?
 15 A. I don't, I'm afraid. It's likely that I was looking at
 16 it in relation to any multi-agency involvement or any
 17 linkages with other plans to make sure it linked in with
 18 the major incident plan or any of our other plans.
 19 I wouldn't have been looking at it from a firearms
 20 response point of view, it would have been more of
 21 a contingency planning point of view.
 22 Q. It may be that that is an answer to the next point I was
 23 going to invite you to deal with, but let me ask it
 24 anyway.
 25 Bearing in mind that you had received no training in

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1 MTFAs and yet this was the policy and plan that dealt
 2 with MTFAs, and bearing in mind that you had absolutely
 3 no operational experience or training as a firearms
 4 officer , were you an appropriate person to be updating
 5 SOP 47?
 6 A. Not in relation to firearms operations, but as I said,
 7 in relation to where the plan linked in with other plans
 8 or affected other specialist operations departments
 9 within GMP, or any multi—agency partners, that was my
 10 area of expertise and that was where I could bring
 11 expertise to bear on the plan to make sure it wasn't
 12 written in isolation and that it linked in correctly
 13 with all the other plans that we had.
 14 I think around about that time JESIP was also coming
 15 to the fore. I can't remember the exact dates, but it
 16 may have been that I'd asked to look at it to look at
 17 the JESIP angle as well. I'm not sure, I don't recall
 18 looking at that specific plan and reviewing it. But
 19 obviously I did.
 20 Q. I do appreciate that answer, but I'm just going to press
 21 a little further, although I think I know what you'll
 22 say. By this stage in 2013 you had known for a period
 23 of between 13 and 15 years of the massive
 24 responsibilities , to use your phrase, that the FDO could
 25 come under in the event of an incident. And what we

1 know is that this plan, SOP 47, did deal with the
 2 responsibilities of an FDO in the event of an MTFA.
 3 A. Mm—hm.
 4 Q. And do you think that you will have considered that
 5 issue when you updated SOP 47?
 6 A. I will have — I don't know whether I altered it in any
 7 way, shape or form in relation to the FDO duties, but
 8 I doubt very much that I did because they were all
 9 duties that obviously the firearms teams had arranged
 10 with the FDO and I would suspect had been signed off by
 11 the FDO or someone from the area operations rooms,
 12 operational communications branch, whatever they were
 13 called at that point in time.
 14 SIR JOHN SAUNDERS: Mr Greaney, I well understand the
 15 position , but I want to avoid any misunderstanding with
 16 anyone reading the transcript.
 17 MR GREANEY: Yes.
 18 SIR JOHN SAUNDERS: It's perfectly possible to have
 19 a massive responsibility but be able to cope with it
 20 yourself. The problem with the FDO may not have been
 21 just the extent of the responsibility but the number of
 22 things he or she had to do at the time.
 23 MR GREANEY: Sir, exactly. I'm just going to ask the
 24 witness about that.
 25 Did it occur to you at any stage over that 13 to

1 15—year period that what the FDO would need in the event
 2 of, for example, a terrorist attack would be help from
 3 other people within the operational control room?
 4 A. It did and I was under no illusions that they would get
 5 that help in the event of a major incident. They were
 6 sat in a room with a lot of other (inaudible: distorted)
 7 communicators and that assistance would have been able
 8 to them in the event of a major incident.
 9 Q. Did it occur to you at any stage in that period that the
 10 other people within the room would need to know what was
 11 expected of them by the FDO in the event of a terrorist
 12 attack?
 13 A. Yes, it did, and all the plans were available to them,
 14 so they could look at the plans and receive training in
 15 (inaudible: distorted) plans was and there was,
 16 certainly in the early stages of my involvement with
 17 resilience development — sorry, my involvement with
 18 communications, there was a major incident training
 19 course given to communicators so they would be well
 20 aware after that course of the content of the plans and
 21 their responsibilities .
 22 Q. So what seems to be the position is that the various
 23 plans that dealt with the response by GMP to an
 24 Operation Plato incident did not contain any information
 25 for others within the room about what their delegated

1 tasks would be. And if that proves to be the position ,
 2 would you accept that that was an inadequacy in the
 3 plans?
 4 A. I don't know because I can't recall what that particular
 5 plan says, but my understanding would be that the
 6 responsibilities were for the force duty officer , but as
 7 with any supervisor, you may hold the responsibilities ,
 8 but you can delegate them out. If you can't deal with
 9 them all, you delegate them to people who can deal with
 10 them. So whilst you still have responsibility , you have
 11 delegated other people to do the jobs that you can't
 12 manage to do.
 13 Q. That no doubt is correct, but I'm sure that you'll be
 14 able to see, and this is a point that the chairman has
 15 made, that there is a difference between the force duty
 16 officer seeking to delegate tasks in the heat of an
 17 ongoing terrorist incident and those who have
 18 responsibilities knowing ahead of time what those tasks
 19 are.
 20 A. Yes, absolutely. That's why we trained and exercised
 21 in relation to plans and that's no doubt why the
 22 communications officers received a major incident
 23 training course.
 24 Q. We're going to come on to look at Winchester Accord
 25 of course, but do you agree that it's obviously better

1 that those within the OCR should know what's expected of
 2 them before an incident occurs as opposed to being told
 3 what to do in the heat of the incident by the FDO?
 4 A. Yes, which is my point about training. That's why
 5 people receive training so that they know ahead of time
 6 what to expect.
 7 SIR JOHN SAUNDERS: Do you mind if I just --
 8 MR GREANEY: I don't, sir, no.
 9 SIR JOHN SAUNDERS: Where we appear to have got to is that
 10 everyone has accepted that what was needed was action
 11 cards which individual people working in OCB had if the
 12 major incident came so they would know what they did, so
 13 it's Mr A's job to ring so--and--so or Mr B's job to ring
 14 so--and--so, so they knew in advance what they'd have to
 15 do, not just generally know the sort of jobs which they
 16 might have delegated, but you all know beforehand
 17 otherwise you may get a situation where the force duty
 18 officers thinks, "It's quicker if I just do it all
 19 myself". Actually having pre-delegated jobs which they
 20 understand from an action card, was that ever considered
 21 as something which it would be useful to have?
 22 A. My understanding is that the OCB did have drop-down
 23 lists on their computer system in relation to things
 24 that needed to be done, but I don't know what they were.
 25 SIR JOHN SAUNDERS: Thank you.

1 A. I don't have the detail, sorry.
 2 MR GREANEY: Obviously we're going to bear in mind in
 3 considering all your evidence that of course you haven't
 4 worked in GMP for a period of 4 years now, 4 years
 5 almost to the day in fact.
 6 I'm going to move on to the third topic, which is
 7 the Greater Manchester Resilience Forum. The
 8 Cabinet Office document dealing with the role of local
 9 resilience forums provides guidance as to the seniority
 10 of the representatives of category 1 responder
 11 organisations attending Local Resilience Forum meetings.
 12 I'm just going to show the relevant page to you,
 13 although it certainly won't take you by surprise.
 14 {INQ019376/1}. We looked at this with Mr Argyle
 15 a few weeks ago.
 16 Can I just check, Ms Roby, that you're able to see
 17 that?
 18 A. Yes, I am, thank you.
 19 Q. Very good. Next we'll go to {INQ019376/12} where the
 20 point I was just making is addressed.
 21 Towards the bottom of what we see on the screen, it
 22 says:
 23 "The LRF itself is a strategic group and should
 24 attract a sufficiently senior level of representation.
 25 The local authority representative, for example, should

1 be the chief executive or deputy chief executive and the
 2 police representative should be the area chief constable
 3 or deputy chief constable.
 4 "The LRF should ensure that participants at its
 5 routine meetings reflect the membership of the Strategic
 6 Coordinating Group which would be called in in response
 7 to any emergency in the LRF area."
 8 So just hold those observations or those statements
 9 in mind for a moment, Ms Roby. In fact, we can see that
 10 that Cabinet Office guidance is reflected in the terms
 11 of reference of the Greater Manchester Resilience Forum.
 12 Mr Lopez, {INQ012418/1}. Under the heading
 13 "Membership":
 14 "Strategic/board level representation from
 15 Greater Manchester's category 1 and 2 responders, the
 16 military, DCLG, academic and voluntary sector
 17 representatives. Other organisations to attend by
 18 invitation."
 19 If we go over to page 2, we can see a list of
 20 particular individuals, I hope. {INQ12418/2}, the
 21 bottom half of that page. We can see there the three
 22 named GMP members are Superintendent Giladi,
 23 Vanessa Jardine, who was a temporary ACC at the time,
 24 and Lee Parker, who was an inspector. Let's just pull
 25 those strands together, Ms Roby.

1 The key points are that representation or membership
 2 of the Local Resilience Forum should be at a high level,
 3 indeed a chief officer level within GMP, and membership
 4 should involve those who may actually form part of the
 5 command team in the event of an emergency. So it's
 6 a rather long lead--in to my questions, but I hope this
 7 is going to be helpful for you, Ms Roby. Against that
 8 background we're going to look at a chart which sets out
 9 who actually attended meetings of the Greater Manchester
 10 Resilience Forum in the 2 years prior to the arena
 11 attack.
 12 This is most conveniently taken from a report of the
 13 policing experts, their final report at {INQ035309/55}.
 14 I'm not going to read out all of the information,
 15 I'm going to summarise it in one moment, but we can see
 16 the date of the first meeting in the chart,
 17 13 March 2015.
 18 If we go to the next page, please, {INQ035309/56},
 19 and enlarge just the top half, we can see that the final
 20 meeting there is listed, 27 March 2017. So 2 years and
 21 2 weeks exactly.
 22 The position, Ms Roby, is this: there were
 23 nine meetings between those two dates. On only three
 24 occasions did an ACC attend, so on only three occasions
 25 did anyone who might be described as being of chief

1 officer rank attend. On two occasions in those nine
 2 meetings attendance was by an inspector only. There was
 3 little consistency of GMP attendance, so by my reckoning
 4 a total of 11 people attended across those
 5 nine meetings. Six of them attended only a single
 6 meeting and the highest attendance was by you and
 7 Inspector Parker and that was just three times.

8 I'm not going to suggest for one moment, Ms Roby,
 9 that that was any fault of yours. But could I ask you
 10 whether you are able to offer any insight in answer to
 11 these questions? First of all, did GMP lack interest in
 12 the Local Resilience Forum?

13 A. I don't think it's that they lacked interest, I think
 14 during that period of time, again we're back to budget
 15 cuts and a number of movements at senior officer level,
 16 you see in the apologies a number of different apologies
 17 from different ACCs. Usually, the ACC in charge of the
 18 specialist operations portfolio would be the one
 19 responsible for attending the GMRF meeting. That ACC
 20 changed a number of times over the period of 3 or
 21 4 years and I think that probably went some way to the
 22 attendance that you've seen there today.

23 Q. Was it unsatisfactory that there was not regular
 24 attendance by someone at chief officer level?

25 A. In my opinion, yes, it was.

25

1 MR GREANEY: Sir, I'm moving on to the fourth topic unless
 2 you have any questions about the resilience forum?

3 SIR JOHN SAUNDERS: No, thank you.

4 MR GREANEY: Topic 4, Ms Roby, Exercise Winchester Accord.

5 I'm now at paragraph 12 of your first statement.

6 I think we're doing okay for time.

7 Were you the exercise coordinator for the Resilience
 8 Forum activity and most of the non-firearms GMP activity
 9 in respect of day 1 of Exercise Winchester Accord?

10 A. Yes, I was.

11 Q. You'll see that I have said day 1 rather than day 2. It
 12 has been established that day 2 is an error in the
 13 statement. I think you drew that to your team's
 14 attention and they drew that to our attention, so where
 15 we see "day 2" it should read "day 1".

16 What did that mean, being the exercise coordinator?

17 A. I had written the majority of the exercise along with
 18 some of the — the overview of everything that we were
 19 expecting to happen and so I was a bit of a roving
 20 problem solver, if you like. We allocated umpires to
 21 each of the individual areas so that they were close to
 22 that area and could deal with anything that went wrong
 23 within that area and note down any good points, any bad
 24 points, within that area. But I was the overall
 25 coordinator for the whole of that side of the exercise.

26

1 I based myself at force headquarters.

2 I had also written the strategic coordination centre
 3 plan and it was that that we were testing, so I probably
 4 had the best knowledge of the various aspects of that
 5 particular plan.

6 Q. By way of background, had the North-west
 7 Counter-terrorism Unit approached GMP and requested that
 8 you participate in the exercise?

9 A. Yes, they did.

10 Q. This isn't, as I understand it, operationally sensitive.
 11 Was the primary aim of the exercise the relicensing of
 12 military assets for domestic purposes?

13 A. That's correct.

14 Q. I'm not going to ask you what that means, but it does
 15 appear from that that the primary aim of Exercise
 16 Winchester Accord was not testing the FDO; is that
 17 correct?

18 A. That's correct, yes.

19 Q. Nor was the primary aim testing JESIP working?

20 A. Yes, that's probably correct as well.

21 Q. Did the Counter-terrorism Unit need the involvement of
 22 GMP's special operations department, including firearms?

23 A. I think I'm correct in saying they probably only needed
 24 the firearms department in order to achieve the primary
 25 aim of military relicensing.

27

1 Q. And I believe it's the position that GMP came to the
 2 exercise relatively late?

3 A. Yes. My recollection may be wrong, but I think another
 4 force was due to do that particular relicensing. They
 5 rotated it around the country and for whatever reason
 6 that force couldn't do it and I think we were asked in
 7 about November or December whether we could facilitate
 8 it.

9 Q. So normally, you would be planning an operation such as
 10 this for about 12 months, but you had a shorter period
 11 than that on this occasion?

12 A. That's correct, yes.

13 Q. But nonetheless, I think you were pleased to be
 14 involved?

15 A. Extremely pleased to be involved, yes.

16 Q. And as you put it in the statement, you threw yourself
 17 into it?

18 A. Yes. We'd had a number of exercises with the
 19 Counter-terrorism Unit cancelled because of everything
 20 that was going on in that period of time around the
 21 world and so this was our opportunity to be able to
 22 exercise with them and know that it wasn't going to get
 23 cancelled.

24 Q. Did you regard it as an opportunity to exercise a lot of
 25 structures within GMP?

28

1 A. Yes, I did. I was nearing the end of writing the
2 Strategic Coordination Centre plan and this was a prime
3 opportunity for me to test that plan.
4 Q. And it was an operation for you to test structures in
5 circumstances which you hadn't had a chance, as you felt
6 it, to test those structures for some time?
7 A. That's correct, yes.
8 Q. Can I invite you to agree, as I'm sure you will, that
9 it's important not just to exercise, it's important not
10 just to identify lessons that can be learned, ultimately
11 it's important to learn those lessons and make the
12 necessary changes?
13 A. Yes, absolutely.
14 Q. There is no value in exercising for its own sake, is
15 there?
16 A. None whatsoever.
17 Q. A list of objectives was set for the exercise; is that
18 correct?
19 A. Yes, that's correct.
20 Q. We'll find this at {INQ007693/1}.
21 I won't read through all of them, but we can see --
22 SIR JOHN SAUNDERS: Can I just ask something before you do?
23 I think it's headed, I know it has just been removed
24 actually, "Local objectives". Is that in
25 contradistinction to the licensing, which may be

1 a national objective?
2 A. Yes, it is. So the ODU set the counter-terrorism and
3 relicensing objectives. These local objectives were the
4 ones that I bolted on to the exercise in order to test
5 the things that we needed to test. So these are the GMP
6 objectives and other agencies that were involved had
7 their own local objectives, so the Fire Service had
8 their own set of objectives, as did NWAS and some of the
9 other agencies.
10 MR GREANEY: Thank you, sir. That's important and now very
11 clear.
12 We can see there's a heading "Force duty officer"
13 and 10 objectives set under that heading.
14 A. Yes.
15 Q. Was it your idea that there should be objectives set
16 in relation to the FDO?
17 A. Yes, it was.
18 Q. Why?
19 A. I can't remember how it came into my discussions about
20 moving the FDO from the operational control room that
21 they worked in to a room at force headquarters, and
22 having discussed that with a few people, I didn't really
23 think that that would work, so we based this particular
24 exercise on the proposed structures rather than the
25 structures that were present at the time, if that makes

1 sense. So I spoke to Chief Inspector Booth about what
2 the proposal was and we framed the exercise around that
3 proposal.
4 Q. First, it would be fair to say therefore that you
5 thought the moving of the FDO to force headquarters was
6 a bad idea?
7 A. That's correct, yes.
8 Q. Why did you think it was a bad idea?
9 A. As I have said previously, the force duty officer works
10 in a room with -- gosh, I don't know -- lots and lots of
11 people, probably about 50 or 60 people in that room with
12 him, radio operators, call-takers, supervisors. And
13 in the event of a major incident, a lot of them could be
14 called upon to assist in dealing with that major
15 incident. He could (inaudible: distorted) the FDO
16 duties to those staff. If you move them out of that
17 particular environment and put them into a room where
18 they've only got five or six or eight, I can't remember
19 how many they were proposing to bring with him, staff
20 then you vastly reduce their act to delegate.
21 Also, when you're sat in a room with a number of
22 radio operators and a number of channels, you actually
23 get a feeling for that room, so you can feel the
24 atmosphere in the room and you know instantly when
25 something's happening, whereas if the FDO had been sat

1 remotely they would have had to be told that something
2 was happening, they wouldn't have picked it up from the
3 feeling in the room.
4 Q. I just want to make sure that we understand this
5 completely. The inquiry has heard a good deal of
6 evidence already that within the community that was
7 concerned with the response to an Operation Plato
8 incident, it was recognised that, to say the least,
9 in the event of such an incident the FDO was liable to
10 be overwhelmed. Were you aware of the risk that that
11 might occur in an MTF type situation at the time we're
12 concerned with?
13 A. Yes, I was, and in my writing of the Strategic
14 Coordination Centre plan, or the force command module
15 plan as it became known, I moved some of that
16 responsibility from the FDO and did a bit of a cascade
17 where other people were given the responsibility to
18 inform various agencies and turn out people.
19 Q. I'm not entirely sure what you're referring to and we
20 probably don't need to delve into another plan. What
21 I can tell you about is that the reality of what was
22 happening within GMP is that version 5 of SOP 47 that we
23 looked at earlier was amended in May of 2017, not to
24 reduce the responsibilities of the FDO, but in fact to
25 increase it. That's where the evidence seems to have

1 taken us.
 2 Let's return to what you can help us with, which is
 3 this: you understood that there was, even in the OCR,
 4 a risk that the FDO, force duty officer, would be
 5 overwhelmed in the event of an Operation Plato type
 6 incident. Have I correctly understood that your concern
 7 was that if the FDO was to be moved from the operational
 8 control room to force headquarters, that risk of the FDO
 9 being overwhelmed was only going to be increased?
 10 A. That's correct, yes. Although I think overwhelmed when
 11 the FDO is sat in the operational control room is a very
 12 strong term. I take the chair's point that people deal
 13 with things in different manners and some people are
 14 overwhelmed with two tasks, some are not overwhelmed
 15 with 20. But they certainly had a lot of things to do,
 16 a lot of responsibility, but some of it could have been
 17 delegated quite easily.
 18 Q. When we look at the objectives that you set, I'm not
 19 going to read them all out and indeed one of them is
 20 operationally sensitive, but we can see that objective 7
 21 was:
 22 "Examine the proposed structures for the FDO
 23 relocation to force headquarters."
 24 And that's really what you've just described to us,
 25 is it not?

1 A. That's correct, yes.
 2 SIR JOHN SAUNDERS: Mr Greaney, I know it's always a wrong
 3 thing to go to the end before the beginning, but just so
 4 we're hearing this in the context that everyone
 5 understands, what was the location of the FDO on 22 May?
 6 MR GREANEY: It was not force headquarters, it was the
 7 operational control room.
 8 SIR JOHN SAUNDERS: He went back to where he had originally
 9 been?
 10 MR GREANEY: Indeed. You're quite right, sir, the reality
 11 is what was being thought about had not occurred,
 12 certainly at the time of the arena attack. Thank you
 13 for that clarification.
 14 We can take that from the screen, Mr Lopez.
 15 Was the first day of Exercise Winchester Accord
 16 something called a live play marauding terrorist
 17 firearms attack scenario?
 18 A. Yes, it was.
 19 Q. I'm at paragraph 26, sir.
 20 Did that involve an attack at the Trafford Centre?
 21 A. That's correct.
 22 Q. Was it during that day that the FDO objectives that
 23 we have just looked at were tested?
 24 A. Yes, that's correct.
 25 Q. During an exercise such as that that was occurring,

1 would some roles be scripted and some roles be what were
 2 described as active players?
 3 A. Yes, that's correct.
 4 Q. Could you explain in just a few sentences what those
 5 different roles involved, please?
 6 A. Yes. So because it's an exercise, we couldn't hope to
 7 run it like a real incident because that would involve
 8 closing parts of the force and the force needed to
 9 continue to run as normal. So some of the roles
 10 we would have either written scripts for or said, this
 11 is happening, that's happening. The roles that were
 12 live play, we would expect them -- they wouldn't get any
 13 scripts and we would expect them to act as they would
 14 in the event of a major incident. We'd expect them to
 15 pull plans, to read things and to make decisions as they
 16 would during a live incident.
 17 Q. Was the FDO role an active player role?
 18 A. It was an active player role, yes.
 19 Q. Who was the FDO for the exercise?
 20 A. I think it was Marcus Williams, a very experienced
 21 firearms officer, but relatively new to the FDO role.
 22 Q. Was the set-up for the FDO during Exercise
 23 Winchester Accord comparable to the set-up for the FDO
 24 during a real major incident?
 25 A. It was comparable to the proposed set-up for the FDO

1 during a (inaudible: distorted).
 2 Q. Was it comparable to the OCR set-up?
 3 A. No, it was comparable to the proposed set-up.
 4 Q. Were there two reasons why it was comparable to the
 5 proposed set-up? First, because that was the objective
 6 that you were testing?
 7 A. Yes.
 8 Q. And second, did you consider that it would be possible
 9 to test the FDO role as against the OCR set-up? Were
 10 there any reasons why that couldn't be achieved?
 11 A. Yes, sorry, I was trying to compute what you were asking
 12 me. Yes, similar to my previous answer in that in order
 13 to test the FDO sat in their seat in the OCB with all
 14 that -- we would need to move those OCB operations to
 15 another room and that's really difficult to do given
 16 we were reducing operational control rooms, et cetera.
 17 So it was always very difficult to test the FDO in the
 18 real situation, if you like, in their location.
 19 Q. Could you just bear with me? I'm going to ask Mr Suter
 20 a question.
 21 (Pause)
 22 I'm next going to ask you about some debrief
 23 reports. Others can ask you about the exact detail of
 24 Exercise Winchester Accord if they want to do so. I'm
 25 more concerned with the outcome and what was learned or

1 should have been.
 2 A. Okay.
 3 Q. Have you seen a number of debrief reports from Exercise
 4 Winchester Accord?
 5 A. I think I've seen three.
 6 Q. Which are of the three that you remember having seen?
 7 A. The GMP local debrief, the multi-agency debrief, and
 8 extracts from the ODU -- I think it was a regional
 9 paper.
 10 Q. The one I would like to ask you about is, as it's
 11 described in your statement, the GMP structured debrief
 12 report, please.
 13 So could we go to -- we'll take it from this INQ
 14 reference, {INQ007615/1}.
 15 We did look at this yesterday with a witness, or
 16 Ms Cartwright did, I think.
 17 SIR JOHN SAUNDERS: I think having a completely new context
 18 has certainly helped me enormously in understanding
 19 what was going on. So don't think you can't look at the
 20 bits again.
 21 MR GREANEY: Thank you very much indeed, sir. There are
 22 just a few bits that we'll look at.
 23 We can see that this is the Major Incident Public
 24 Order and Events Group meeting on 7 July. I think the
 25 one thing that I should have done was to identify that

1 Winchester Accord was 9, 10 and 11 May 2016. So this is
 2 following on from that.
 3 We can see those who were present. You weren't one
 4 of them, but there was attendance at superintendent
 5 level with apologies from ACC O'Hare.
 6 If we go to {INQ007615/3}:
 7 "Exercising and testing/emergency planning.
 8 Sergeant Henderson [from whom we heard yesterday] gave
 9 a brief update. Sergeant Henderson circulated a copy of
 10 the recommendations that had arisen out of Exercise
 11 Winchester Accord for perusal. See appendix A. He gave
 12 a brief rundown of the various aspects that each
 13 recommendation covered."
 14 Then if we go further down, paragraph 17:
 15 "The exercise had been run specifically to test
 16 whether the FDO could work in isolation and it had been
 17 established that this did not work. Some work has
 18 already been done in relation to potentially bringing
 19 radio operators from [operationally sensitive, I'm not
 20 sure why because we all know where it is] to force
 21 headquarters."
 22 Did that accord with your perception that the
 23 outcome of the exercise had been that it had been
 24 established that the FDO could not work in the way that
 25 was being tested?

1 A. I felt that -- that's correct, yes. But I felt prior to
 2 that that that would be the outcome, so there weren't
 3 any surprises for me in that.
 4 Q. Your view was that, subject to the personalities
 5 involved and their ability to cope, there was always
 6 a risk that the FDO would be overwhelmed, which isn't my
 7 word, it's a word of others, and as you told us, you
 8 thought that risk was only going to be increased by
 9 moving the FDO to force headquarters?
 10 A. That's correct, yes.
 11 SIR JOHN SAUNDERS: Are you going on to another
 12 recommendation?
 13 MR GREANEY: I was going on to an entirely different page
 14 but within the document, sir, so if --
 15 SIR JOHN SAUNDERS: So not to do with FDOs?
 16 MR GREANEY: Well, yes to do with FDOs, but by all means
 17 please ask your question.
 18 SIR JOHN SAUNDERS: As a result of this, the recommendation
 19 would be: don't move the FDO to force headquarters?
 20 A. Yes, sir.
 21 SIR JOHN SAUNDERS: And that recommendation was followed
 22 because the FDO didn't move or was it still under
 23 consideration?
 24 A. I'm afraid I have no idea.
 25 SIR JOHN SAUNDERS: Okay. We've had slightly different

1 views about the FDO. Some people have said it was just
 2 a point which was bound to fail when the actual thing is
 3 happening because they'd have too much to do. My
 4 impression from you is: well, yes, it could be tough,
 5 things could happen, but because of the number of people
 6 in the OCB, jobs could be delegated to them, and
 7 actually it would all work all right. Is that fair or
 8 not?
 9 A. I don't think I ever said it would all work all right,
 10 sir, but it had a better chance of working if the FDO
 11 remained in the operational communications branch,
 12 in the OCR, so in the room.
 13 SIR JOHN SAUNDERS: But from the point of view of me,
 14 looking at this situation, saying, "It all failed in
 15 Winchester Accord, why didn't they do something about
 16 it?", you were not particularly saying do anything about
 17 it except, "Make sure it doesn't move from the OCB"?
 18 A. They weren't my recommendations, sir, I didn't have
 19 anything to do with the structured debriefs.
 20 SIR JOHN SAUNDERS: Okay, but were you saying to whomever,
 21 "Well, okay, obviously we can't move it to the force
 22 headquarters, but actually even at the OCB we need to be
 23 taking some steps to make sure it will work in an
 24 emergency"?
 25 A. No, I didn't say that to anyone. I think it's possibly

1 for me to explain my role at this stage. In 2016 we
2 reduced -- we looked to reduce the department from two
3 inspectors to one. I stepped away from my role in
4 testing and exercises and contingency plans. So apart
5 from recommendations that refer to the Strategic
6 Coordination Centre, I didn't own any of the other
7 recommendations; that was the role of another inspector
8 at that point in time.

9 SIR JOHN SAUNDERS: I'm really not seeking to blame you, I'm
10 trying to see how this all happened. The reality is --

11 A. (inaudible: distorted), sir.

12 SIR JOHN SAUNDERS: -- that no one ever tested how the FDO
13 would be able to cope in an emergency if in the OCB
14 because, as you said, ordinary life had to go on in the
15 OCB, you had to move all the operators off to deal with
16 the normal work, so it was never tested in an exercise;
17 is that right?

18 A. To the best of my knowledge, no, but I retired in 2017,
19 so I don't know what's happened since then.

20 SIR JOHN SAUNDERS: Okay. Well, we're looking at events up
21 to 22 May, really, and you can help us that it was never
22 tested then. So the reality is that the FDO's role,
23 which was always understood to be a possible area of
24 failure, was never actually tested?

25 A. Not to its fullest extent, no. No.

1 SIR JOHN SAUNDERS: Thank you.

2 MR GREANEY: I'm not going to suggest that you were aware of
3 these things, or certainly all of them, but I want to
4 check that you didn't hold a different view in
5 2016/2017. What the chairman has heard is that within
6 Counter-terrorism Policing Headquarters there was an
7 understanding that the FDO was the potential point of
8 failure during an Operation Plato incident, that within
9 the Inspectorate, so HMICFRS, there was a recognition
10 that the FDO role was the potential point of failure,
11 within the Policy and Compliance Unit of GMP there was
12 a recognition that the FDO was the potential point of
13 failure, and I believe that your position is that you
14 also had long recognised that the FDO during a Plato
15 incident was the potential point of failure?

16 A. One of the potential points of failure.

17 Q. Well, the major point of failure.

18 A. Yes.

19 Q. Obviously there might have been other points at which
20 there would be a failure, but that was the point at
21 which everyone knew there was a real risk it wasn't
22 going to work?

23 A. Yes.

24 Q. Could we go to {INQ007615/13} of this document, please.

25 A number of recommendations were made and I think

1 you said that these weren't your recommendations;
2 is that right?

3 A. That's correct, yes, I didn't attend the structured
4 debriefs. Although I commissioned them, I didn't attend
5 the debriefs, so these are the recommendations that came
6 out of the debriefs.

7 Q. It certainly won't have been your fault, but wouldn't it
8 have been a good idea for you to have attended the
9 debriefs bearing in mind you were one of the planners of
10 Exercise Winchester Accord and had been present during
11 it?

12 A. I don't know what I would have contributed to the
13 debrief. The debrief was about the exercise players and
14 how they felt and what they did.

15 Q. At all events we can see from that page that a number of
16 recommendations were made. We don't need to go through
17 all of them or many of them. You were made the owner of
18 a number of recommendations; is that correct?

19 A. That's correct. They're the ones that relate to the
20 Strategic Coordination Centre, which was a new plan, and
21 this was its first run-through.

22 Q. There were some that you were not made the owner of, one
23 of which was:

24 "4. JESIP training needed for officers and
25 commanders."

1 What was your understanding, bearing in mind you
2 weren't at the debrief, of why Winchester Accord had
3 identified a need for JESIP training?

4 A. I would suggest that the communication between agencies
5 went wrong at some point during that exercise, which is
6 why they feel the need for JESIP training or additional
7 JESIP training, because we'd already run a lot of JESIP
8 training up to that point.

9 Q. What was your perception of how communication had gone
10 wrong during Winchester Accord? What had you seen or
11 been told about that made you come to that view?

12 A. I don't think there was much communication at the
13 forward command point. I think the tactical firearms
14 commander didn't go to the forward command point. I'm
15 sorry, I'm -- this is my recollection, I haven't seen
16 this written anywhere.

17 SIR JOHN SAUNDERS: And I think your description of there
18 being a shortage or lack of communication, I think there
19 was probably none at all at the forward control point
20 from what we have heard.

21 A. Right.

22 MR GREANEY: We can see Inspector Anthony Hughes was made
23 the owner of that recommendation. Do you recall what
24 role Inspector Hughes had?

25 A. Yes, he was in the training department.

1 Q. The final entry I want to ask you about on this
 2 document — over the page, please {INQ007615/14}.
 3 We have seen a reference to this paragraph already,
 4 paragraph 17, and I'm certain we looked at it yesterday:
 5 "Additional support for the FDO would have helped
 6 and would be necessary in the event of a real incident."
 7 The owner was not you but Chief Inspector
 8 Mike Booth. You did refer to him yesterday (sic).
 9 What was Chief Inspector Booth's role at the time that
 10 we're concerned with?
 11 A. Chief Inspector Booth was a chief inspector in the
 12 operational communications branch, so he would have been
 13 in the ideal place to (inaudible: distorted) the
 14 recommendations and to put in place any changes that
 15 were required. He was actually the exercise umpire for
 16 the FDO during Winchester Accord, so he would have seen
 17 first —hand what was happening within that FDO group.
 18 Q. I want to ask you about a separate issue relating to
 19 Exercise Winchester Accord and then we'll take — two
 20 separate aspects and then we'll take a break and I'll
 21 deal very shortly after the break with Exercise Sherman.
 22 I'm going to ask that you be shown a document, which
 23 sets out some feedback in relation to Exercise
 24 Winchester Accord provided by the North West Ambulance
 25 Service. I'm going to see whether you agree that that

1 feedback was accurate. It's {INQ013669/1}. I don't
 2 think we've seen this document before, sir.
 3 A. I don't have a copy of that document, sir.
 4 Q. It's on the screen. I don't think you're going to be
 5 disadvantaged by not having seen it. If you haven't
 6 that will undoubtedly be my fault because I came across
 7 the document only recently.
 8 This is an NWS document, "Winchester Accord Debrief
 9 Points". As I have said, I'm just going to ask you
 10 whether you agree with one of the observations, which is
 11 the third bullet point:
 12 "Huge delay in deployment of Ambulance/Fire and
 13 Rescue Service to triage and treat (triage teams
 14 deployed at 02.20, 2 hours 20 after attack). We should
 15 have been able to deploy Ambulance and Fire and Rescue
 16 Service into warm zone on outside of building within
 17 30 minutes of attack and therefore would have rescued
 18 a number of casualties early. This delay would
 19 unequivocally have resulted in unnecessary loss of
 20 life."
 21 Does that feedback from NWS resonate with you?
 22 A. I wasn't aware at the time of the exercise that there
 23 had been such a big delay, but I agree entirely with the
 24 statement made.
 25 Q. So it rather appears as if that was a learning point

1 from Exercise Winchester Accord, do you agree?
 2 A. Yes.
 3 Q. Before we take that break, I just want to ask you about
 4 something that was said yesterday. Inspector Lear, who
 5 was the head of the Policy and Compliance Unit within
 6 the firearms department, said that there had been
 7 nothing fed back to him from Exercise Sherman.
 8 SIR JOHN SAUNDERS: Exercise Winchester Accord.
 9 MR GREANEY: I'm sorry, from Exercise Winchester Accord. He
 10 suggested that we ought to enquire of Sergeant Henderson
 11 why that was so and effectively Sergeant Henderson
 12 suggested that we ought to enquire of you why that was
 13 so. So can I just ask you a very simple question for
 14 your comment. I hope it's a simple question anyway.
 15 Was it your responsibility to feed back to the Policy
 16 and Compliance Unit and, if so, did you do that?
 17 A. It wasn't my responsibility, no. The structure was that
 18 we fed debrief reports into the Major Incident and
 19 Public Order and Events Group, of which you've had some
 20 minutes up on the screen earlier. Attendance at that
 21 group was from all departments within specialist
 22 operations. Mr Giladi, as you saw from the minutes, was
 23 in attendance at the meeting where we discussed the
 24 debrief from Winchester Accord. It was expected that
 25 the attendees of that meeting then took back any action

1 points to their individual departments.
 2 SIR JOHN SAUNDERS: So shall we pass the ball on to
 3 Superintendent Giladi now?
 4 A. Not necessarily, sir. I can't remember whether there
 5 was anyone from firearms training at that meeting, but
 6 that was the agreed structure, internal debriefs went to
 7 the Major Incident Group and were then actioned out so
 8 that we had a point of contact and an audit trail around
 9 (inaudible: distorted).
 10 SIR JOHN SAUNDERS: I'm sorry, it sounded like I was getting
 11 at you by that question. It wasn't intended that way.
 12 MR GREANEY: Sir, a number of roads may lead to
 13 Superintendent Giladi and that could be one of them.
 14 I did say we'd take a break, and I know I have done this
 15 before, but it might be more convenient if I just finish
 16 off my questioning in the next 10 minutes if Mr Suter
 17 thinks that that's appropriate.
 18 The fifth and final topic is Exercise Sherman.
 19 We can deal with this efficiently, I hope. I'm at your
 20 second statement now, paragraph 5.
 21 A. Yes.
 22 Q. In your statement, you say:
 23 "The risk of an MTFA was high on the risk register."
 24 What do you mean by that?
 25 A. I think you've heard evidence about the way that the

1 GMRF deals with risk and the risk register. There was
 2 also a national risk assessment document at which MTFA
 3 was mentioned. Given the situation in the world at that
 4 time MTFA was very high on all our agendas.
 5 Q. As a result was the group within the Resilience Forum,
 6 of which you were chair, given the task of creating
 7 a multi—agency exercise product?
 8 A. Yes.
 9 Q. Did Exercise Sherman emerge out of that?
 10 A. It did, yes.
 11 Q. Were you and your staff within GMP involved in
 12 organising and delivering Exercise Sherman?
 13 A. We were, along with multi—agency partners, yes.
 14 Q. Was Exercise Sherman a tabletop exercise?
 15 A. Yes, it was.
 16 Q. Was it delivered in each of the 10 boroughs of
 17 Greater Manchester?
 18 A. Yes, it was.
 19 Q. With the location of the MTFA being altered in each of
 20 the boroughs to a location that was relevant to that
 21 borough?
 22 A. Correct, just to make it more realistic.
 23 Q. And so it was, am I right, that for the event that was
 24 run in the city centre of this city on 26 July, the
 25 scenario was set in Victoria Railway Station?

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1 A. More the arena, I thought, but yes, the arena and the
 2 railway station in general, yes.
 3 Q. But including, it would follow from your answer and from
 4 your statement, the City Room?
 5 A. Yes.
 6 Q. Were participants both from emergency service partners
 7 and also the local business community invited to take
 8 part?
 9 A. Yes, that's correct.
 10 Q. I believe that although you don't specifically recall
 11 the city centre event on 26 July 2016, you did
 12 facilitate the exercise yourself on a number of
 13 occasions?
 14 A. I did, yes.
 15 Q. And you have been able to confirm that, on 26 July,
 16 James Allen of SMG attended?
 17 A. Yes.
 18 Q. Along with Lee Sinnott of SMG?
 19 A. Yes.
 20 Q. And Susie Allott of SMG?
 21 A. That's correct, yes.
 22 Q. When you —
 23 SIR JOHN SAUNDERS: And do we know Ms Stone attended too?
 24 MR GREANEY: Also we know that Miriam Stone attended, yes.
 25 I think the position is she wasn't named on the attendee

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1 list, but we do know that she was present.
 2 What format did the exercise take?
 3 A. It was a tabletop exercise, so we would run a scenario
 4 and then pause and ask questions around all the tables
 5 and then another scenario and so on through the
 6 exercise.
 7 Q. So —
 8 A. We also —
 9 Q. You carry on, I'm sorry.
 10 A. Apologies. I think we also had input from CTSA's and
 11 from the firearms department. I think we did a bit of
 12 a run, hide, tell type scenario as well just so people
 13 knew what to expect.
 14 MR GREANEY: Thank you very much indeed. Those are my
 15 questions. I will invite the chairman to say that we
 16 should have a short break at this stage.
 17 SIR JOHN SAUNDERS: Quarter of an hour?
 18 MR GREANEY: Thank you very much, sir.
 19 (11.25 am)
 20 (A short break)
 21 (11.40 am)
 22 MR GREANEY: Ms Roby, you're now going to be questioned by
 23 the advocates on behalf of a number of the core
 24 participants. None of them are in the room, so it may
 25 be even more difficult than it has been between the two

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1 us. I am sure everyone will be understanding.
 2 First I'm going to ask Mr Smith, who represents
 3 North West Fire Control, to ask his questions.
 4 Questions from MR SMITH
 5 MR SMITH: Good morning.
 6 A. Good morning.
 7 Q. Although Exercise Winchester Accord was planned by the
 8 North—west Counter—terrorism Unit initially, is it
 9 correct that you were responsible for multi—agency
 10 involvement in that exercise?
 11 A. The Training and Exercise Coordination Group, of which
 12 I was the chair, was responsible for the multi—agency
 13 coordination of that exercise, yes.
 14 Q. And you were directly involved in that coordination,
 15 were you not?
 16 A. I was.
 17 Q. During the preparation and planning for the exercise,
 18 were other agencies, that is other than the police,
 19 invited to set their own objectives?
 20 A. That's correct, yes. All agencies set their own
 21 objectives and then brought them to the Training and
 22 Exercise Coordination Group for discussion.
 23 Q. You've given evidence that the purpose of the exercise,
 24 certainly as I understand it from GMP's point of view,
 25 was not to test the role of the force duty officer or

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1 the effectiveness of JESIP training; is that correct?
 2 A. It was to test the role of the force duty officer in the
 3 proposed location, if that makes sense.
 4 Q. Yes. But it doesn't follow from that, does it, that
 5 Greater Manchester Police could not learn from failures
 6 that occurred in the course of this exercise?
 7 A. No, Greater Manchester Police should have learned from
 8 failures that occurred in that exercise.
 9 Q. Did you know Group Manager Neil Gaskell, attached to the
 10 Fire Service?
 11 A. Yes, I do.
 12 Q. And were you aware that he was the GMFRS MTFA lead for
 13 the purposes of that exercise as well?
 14 A. Yes, I was.
 15 Q. Were you aware that it was an important exercise for
 16 Greater Manchester Fire and Rescue Service and that
 17 a considerable amount of work had been put into it?
 18 A. That's correct, yes, I was.
 19 Q. As a result, did you know that the objectives set by
 20 Group Manager Neil Gaskell were to test the Fire
 21 Service's NILO role in a multi-agency exercise?
 22 A. I'm sorry, sir, I don't recall the objectives set by
 23 individual agencies.
 24 Q. Would it surprise you to know that Group Manager
 25 Gaskell's objective also included the Fire Service's

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1 response capability to an MTFA?
 2 A. No, that wouldn't surprise me, nor would the objective
 3 to test the NILO.
 4 Q. Are you able to recall that Greater Manchester Fire and
 5 Rescue Service used a Manchester fire station as a base
 6 from which to move forward once notified of the
 7 commencement of the exercise?
 8 A. Yes.
 9 Q. Is it the case that the trigger for the start of the
 10 multi-agency response was to be the shared declaration
 11 of Operation Plato among the agencies involved?
 12 A. The trigger would have been the FDO declaration of
 13 Operation Plato and then the FDO informing the other
 14 agencies that that had been declared. That was the
 15 expectation.
 16 Q. That's why I used the term "shared declaration of
 17 Operation Plato". So once the force duty officer
 18 ensured that the declaration of Operation Plato had been
 19 passed to the other agencies, that would be the trigger
 20 for the Fire Service, is this correct, and for the
 21 Ambulance Service to move forward?
 22 A. Yes, that is correct, yes. The FDO would also be
 23 expected to identify a forward command point to which
 24 the Fire Service and Ambulance would move.
 25 Q. Well, I just wanted to ask you about that next, if

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1 I may. The rendezvous point and the forward command
 2 point were all agreed in advance, were they not?
 3 A. I think the individual rendezvous points for the
 4 individual agencies were agreed in advance. I'm almost
 5 certain — I would need to look at the sequence of
 6 events, but I'm almost certain that we gave the FDO
 7 a number of choices for the forward command point.
 8 Because it's an exercise we can't have the FDO just
 9 choosing wherever he wants because obviously some of
 10 those places may not have been available. We made —
 11 I'm sure we made a number of places available and gave
 12 the FDO the option of which one they chose.
 13 Q. I'm going to come to the sequence of events in just
 14 a moment, so that might assist you in dealing with that
 15 point.
 16 However, the plan was this, wasn't it, that Greater
 17 Manchester Police would enter the Trafford Centre?
 18 A. Yes.
 19 Q. And the zones representing the limits of exploitation
 20 would then be allocated?
 21 A. I'm sorry, that's outside of my area. The ODU dealt
 22 with all events at the Trafford Centre.
 23 Q. But is it your recollection that the force duty officer
 24 was expected to contact the Fire Service duty NILO, not
 25 the Fire Service's control room?

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1 A. No, I think it was the duty NILO. Yes, I think so. I'm
 2 not sure. I'd need to look at the sequence of events.
 3 But yes, I think that was the way...
 4 Q. I'll come to the sequence of events in just a moment and
 5 I'm sorry if it's putting you at a disadvantage. Will
 6 you forgive me?
 7 A. Yes.
 8 Q. The three NILOs allocated to the incident, I'm going to
 9 remind you of their names just for the purpose of
 10 the record, you may or may not remember, were Station
 11 Managers Smitham, Crawley and Fenwick.
 12 A. Okay.
 13 Q. And it was intended, do you agree, that once the
 14 rendezvous point was established, obviously the Fire
 15 Service and the Ambulance Service would be able to
 16 co-locate with the police?
 17 A. Once the forward command point was established, yes,
 18 they would.
 19 Q. What about the rendezvous point?
 20 A. The rendezvous points were, I think, as I said earlier,
 21 established by individual agencies and they were just
 22 places for them to sit and wait for the exercise to
 23 start, I think.
 24 Q. Before we move to the sequence of events, do you agree
 25 that North West Ambulance Service and the Fire Service

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1 had committed a large number of volunteers and
 2 individuals to this exercise?
 3 A. Yes, they did, as did the police.
 4 Q. For example, more than 80 volunteers were provided to
 5 assist in terms of casualties?
 6 A. Yes.
 7 Q. Is it your recollection that they were put in place at
 8 about 11.30 that night, those —
 9 A. Around about then. Yes, they needed to have make—up,
 10 et cetera, to be realistic casualties.
 11 Q. And the Fire Service had also provided a number of
 12 volunteers as well; is that correct?
 13 A. They did, yes.
 14 Q. So a lot of effort had clearly been put into this
 15 exercise from the point of view of the Fire Service and
 16 the Ambulance Service; do you agree?
 17 A. From the point of view of all agencies, yes.
 18 Q. Well, I'm asking about the Fire Service and the
 19 Ambulance Service. It must have been obvious, do you
 20 agree, that a considerable amount of work had been put
 21 into the planning and preparation for this exercise by
 22 those agencies?
 23 A. Yes.
 24 Q. So can I take you, then, to the sequence of events,
 25 version 4, which I think you've been alerted to and

1 probably have available. It's {INQ034454/1}, please,
 2 Mr Lopez.
 3 {INQ034454/2}, first of all. The last entry.
 4 I must say this is not an easy document to read even
 5 when it's on the portal that we use.
 6 SIR JOHN SAUNDERS: I'd go further than that. It's
 7 impossible to read, Mr Smith.
 8 MR SMITH: I have great difficulty, sir, reading it, even on
 9 the portal.
 10 What I will do, if this is of any help, is to read
 11 out the few points that I want to take the witness to,
 12 if I may, and start at the bottom of page 2.
 13 The important thing is the time on the left—hand
 14 side that I'm going to take you to, if I may. At 00.01,
 15 it was intended, wasn't it, that a number of individuals
 16 who had been tasked with making calls into the police
 17 station should start to make those calls? Is that
 18 correct?
 19 A. Yes, that's correct.
 20 Q. If we go to {INQ034454/3}, and we go to the time, the
 21 third entry down, 00.03, we can pick up the fact that
 22 the force duty officer would start to receive force—wide
 23 information notices; is that correct?
 24 A. That's correct, yes.
 25 Q. We then go to 00.09, towards the bottom of the page on

1 page 3. It's the fourth entry from the bottom:
 2 "The force duty officer at 00.09 was expected to
 3 declare Operation Plato."
 4 And then in the first of the columns which contain
 5 the red text, we can see, can we not, that there is
 6 a sequence of activities that the force duty officer was
 7 to discharge?
 8 A. Yes.
 9 Q. I'm going to ask if we could just read through those:
 10 "Consider urgent spontaneous MACP request. Firearms
 11 authority. Tactical parameters. Set initial working
 12 strategy. Ensure OFC is identified and deployed to
 13 scene. Brief responding firearms assets. Contact SFC
 14 (if not duty ACPO). Request additional firearms assets
 15 (notional). Inform NWCTU duty office. Inform GMFRS and
 16 NWS NILO."
 17 A. That's correct.
 18 Q. Putting aside the order of those events, it was
 19 expected, wasn't it, on this timetable, that at 00.09,
 20 the force duty officer would apply himself to all those
 21 activities?
 22 A. There or thereabouts, yes.
 23 Q. What value would the exercise have had if the force duty
 24 officer could not have completed those tasks as
 25 allocated?

1 A. None, which is why the right—hand column has prompts for
 2 the exercise controller to ensure that those tasks are
 3 done. So if the FDO doesn't get to them, or forgets
 4 about them, the exercise controller within the FDO area
 5 should have prompted them to do all of those things.
 6 Q. So that's a degree of support for the exercise; is that
 7 correct?
 8 A. That's correct, just to ensure that the exercise can
 9 continue to run, that it doesn't stall because one of
 10 those things hasn't happened.
 11 Q. Next, if we go to {INQ034454/4}, please, and we go to
 12 00.12, it's the sixth or seventh entry down. The force
 13 duty officer was required at that stage to make contact
 14 with the Fire Service NILO by telephone; is that
 15 correct?
 16 A. That's correct, yes.
 17 Q. And then moving on from there, at 00.13, to inform the
 18 Ambulance Service NILO by the same method?
 19 A. That's correct — or by radio if the interoperability
 20 channels were up and running.
 21 Q. Do we also then go on to see at 00.13 that in relation
 22 to informing the NILOs for the Fire Service and the
 23 Ambulance Service, there are references in the
 24 right—hand column as follows in the first red column:
 25 "NILO will contact force duty officer for an

1 update..."

2 This is 00.15.

3 A. Oh right, yes.

4 Q. "... and details as to where the Fire and Rescue Service

5 resources are required."

6 Then below that:

7 "Request interoperability channel."

8 A. Yes.

9 Q. Moving on from there, at 00.20, just over midway down

10 the page, item 4:

11 "Force headquarters. Ring the force duty officer."

12 Then there are references to other fire services;

13 is that correct?

14 A. Sorry, I don't have...

15 Q. I'm so sorry, it is just over halfway down, at 00.20,

16 "FHQ Excon". Found it?

17 A. Yes. That was to replicate the regional turnout. So we

18 didn't turn out regional forces from their areas, that

19 was to replicate phone calls that would have been coming

20 in from regional colleagues about what resources they

21 were sending, how many they were sending, et cetera, et

22 cetera.

23 Q. Then we see in the extreme right-hand column for that

24 entry, do we:

25 "Force duty officer line may be busy. Need to keep

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1 trying in order to pass information and obtain answers

2 about where staff will be deployed to"?

3 A. That's correct. We were sending a lot of telephone

4 calls into the force duty officer's number.

5 Q. This is effectively the first reference in this sequence

6 of events, isn't it, to a concern or at least an

7 observation that the force duty officer's line might be

8 busy?

9 A. It's the first specific reference, but I think it can be

10 implied from the number of phone calls that we've sent

11 in to the force duty officer that one line is going to

12 be busy.

13 Q. So is the position: that when you prepared this sequence

14 of events, you appreciated that the force duty officer

15 could be so involved with the various tasks that he was

16 responsible for that it might not be possible to make

17 contact with him?

18 A. Absolutely. That's why I arranged for all those phone

19 calls to be made into the force duty officer. We tried

20 to replicate what would happen in real life, so we tried

21 to replicate the sheer volume of calls that would be

22 coming in, but you must remember that the force duty

23 officer's line can be picked up by other staff within

24 the operational communications room. It's not just one

25 telephone, it's more like a switchboard with a flashing

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1 light that tells you how many calls there are waiting

2 and at any time anyone can pick...

3 Q. Well, I am going to ask you about that point in just

4 a moment, but I only have limited time to complete my

5 questions and I'm probably at the point of overrunning

6 already, so I'll try to keep this as tight as I may,

7 please.

8 I'm going to summarise rather than asking you

9 individually that these were some of the consequences of

10 Exercise Winchester Accord. I'll briefly summarise it

11 and then ask whether you agree.

12 A. Okay.

13 Q. They show, I suggest, first that the force duty officer

14 never made contact with the Fire Service duty NILO.

15 Second, no one formally communicated the location of

16 the RVP to the Fire Service NILO.

17 Third, there was no response to attempts made by the

18 Fire Service to contact the tactical firearms commander.

19 Fourth, GMFRS decided to move after a significant

20 delay from the fire station where they were waiting to

21 the RVP because they knew where it was to be. And when

22 they got there, there was no police presence.

23 They then waited for 45 minutes to an hour at the

24 RVP until they decided to move forward to the

25 prearranged forward control point, and when they got

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1 there, there was no police tactical firearms commander

2 or any delegate of that commander.

3 And the force tactical firearms commander, or rather

4 the police tactical firearms commander, couldn't be

5 reached by the Fire Service by radio or by telephone and

6 hadn't nominated a police officer to assist with

7 coordinating the multi-agency response at the forward

8 command point.

9 Once the Fire Service moved forward to assist with

10 casualties after a delay of about an hour and a half,

11 they met police officers who considered that the

12 exercise was over and were in the course of leaving.

13 Rather than ask you individually about all those, do

14 you agree with all of them, that they were all — I'm

15 sorry?

16 A. I can't comment because I wasn't responsible for that

17 side of the exercise. I didn't have anything to do with

18 the activities at the Trafford Centre. My area of

19 responsibility was the force headquarters and the

20 Strategic Coordination Centre.

21 Q. Well, there are two points I would like to ask you about

22 finally, if I may.

23 A. Certainly.

24 Q. First of all, was the Fire Service, so far as you're

25 concerned, ever informed before this exercise commenced

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1 that they should not expect the force duty officer to
 2 respond and follow that sequence of events that we've
 3 just been through?
 4 A. I have no idea, but I wouldn't expect that that would be
 5 the case.
 6 Q. You'd be very surprised, wouldn't you?
 7 A. I would, yes.
 8 Q. Conversely, therefore, would you have expected the
 9 position to be that the Fire Service would have
 10 anticipated that this operation was intended to work in
 11 a way whereby the force duty officer could make
 12 effective communication with the Fire Service?
 13 A. I'm sorry, I'm not sure what you're asking me. You're
 14 asking me whether the FDO should have been able to
 15 communicate with the Fire Service?
 16 Q. Forgive me, it's my fault, and I'll ask it in a slightly
 17 different way.
 18 A. Okay.
 19 Q. Did you consider, as the exercise coordinator, that the
 20 Fire Service ought to believe that the force duty
 21 officer should be capable of making contact with them
 22 in the course of this exercise?
 23 A. Yes.
 24 Q. Was the Fire Service ever told, "Bear in mind that it
 25 might be impossible to contact the force duty officer"?

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1 A. I have no knowledge.
 2 Q. Certainly you didn't do that?
 3 A. No. But the Fire Service had a copy of this sequence of
 4 events.
 5 Q. Of course. Then finally this, please. Could I take you
 6 to your statement at paragraph 33, which is
 7 {INQ034427/6}.
 8 It reads, doesn't it:
 9 "In the actual OCR at the time there would have been
 10 three or four supervisors, a force duty supervisor, and
 11 then a couple of room supervisors to supervise the room.
 12 They could have made phone calls for the force duty
 13 officer in the event of a major incident. There would
 14 also have been other staff members the force duty
 15 officer could call on if necessary such as the PNC
 16 operator and CK channel operators. In addition, other
 17 divisional staff would probably assist."
 18 Having read that to you, were you there making
 19 reference to the situation that would occur in a real
 20 life incident?
 21 A. Yes.
 22 Q. So finally, this, please. Can you agree that
 23 a situation in which the task of answering the force
 24 duty officer's telephone line was given to a radio
 25 operator who hadn't been trained in call-taking,

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1 couldn't provide necessary information to other
 2 agencies, and felt overwhelmed and stressed by the
 3 responsibility placed upon him is not something that you
 4 would ever have contemplated would have occurred in the
 5 course of an Operation Plato incident involving GMP?
 6 A. I would expect other staff to be answering the force
 7 duty officer's line, yes. As to whether they've been
 8 trained in call-taking, I don't know, I don't know what
 9 training radio operators currently get. When I was
 10 a supervisor, I was trained in call-taking, but I can't
 11 answer that question after 2017, February 2017, because
 12 I don't know.
 13 Q. But before 15 February 2017, which I think was the day
 14 you retired; is that correct?
 15 A. It was, yes.
 16 Q. Before that time, you would have been astonished,
 17 wouldn't you, if you'd been told of circumstances in
 18 a real life MTFA incident in which the force duty
 19 officer's line was being answered by a radio operator
 20 who had no experience or training in call-taking and
 21 couldn't provide the necessary answers to other
 22 agencies?
 23 A. I would be astonished that they had received no training
 24 in call-taking. I wouldn't be astonished that they had
 25 answered the force duty officer's line. And the

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1 information that other agencies were asking about,
 2 I would have expected to be on the FWIN, but again
 3 I don't know whether it was or it wasn't.
 4 Q. And do you agree it wouldn't be satisfactory, would it,
 5 if such a radio operator couldn't provide basic
 6 information in response to requests from other agencies
 7 because that radio operator couldn't obtain the
 8 information from any police officer or senior officer in
 9 the control room?
 10 A. I would say that was totally unsatisfactory.
 11 MR SMITH: Thank you. Those are all my questions. May
 12 I thank you for your answers.
 13 SIR JOHN SAUNDERS: Thank you, Mr Smith.
 14 MR GREANEY: Next, Mr Weatherby who is taking the lead on
 15 behalf of the families.
 16 Questions from MR WEATHERBY
 17 MR WEATHERBY: Can I first of all reassure you that many of
 18 the points I was going to raise with you have already
 19 been dealt with by Mr Greaney and Mr Smith, so I'll be
 20 a little quicker than I would have been.
 21 Firstly, a general point. I think you've already
 22 alluded to this already, but between around about 2011
 23 and when you retired, there were swingeing cuts to
 24 Greater Manchester's budget which affected all areas.
 25 Would it be right to say it particularly affected the

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1 planning and policy making that you were involved in?
 2 A. I don't know whether it affected us any more than any of
 3 the other areas, if I'm perfectly honest, but yes, all
 4 areas were hit very badly by the cuts and the additional
 5 responsibilities on everyone.
 6 Q. No criticism obviously on you, you don't set the budget,
 7 but it had an effect on the ability of you and your
 8 colleagues to do the tasks that were before you?
 9 A. It did.
 10 Q. That's very fair, if I may say so, thank you.
 11 I'm going to concentrate on the overloading issue of
 12 the FDO. You referred to a Strategic Coordination
 13 Centre plan. When you were asked by Mr Greaney, I think
 14 you agreed that there was a general awareness -- I'll
 15 come to that in a little more detail -- of overloading
 16 of the FDO and you referred to this plan that you were
 17 developing at the time; is that right?
 18 A. I had developed it and it was used for the first time in
 19 Winchester Accord.
 20 Q. Right. I think I know, but many watching might not
 21 know. The Strategic Coordination Centre, that is
 22 basically a room at Force HQ; is that right?
 23 A. It's several rooms at Force HQ that allow multi-agency
 24 partners to come together and work together.
 25 Q. Yes. So is it in previous historic times the Gold

1 suite?
 2 A. We didn't... No, we did have a Strategic Coordination
 3 Centre plan, it just wasn't very well-developed. But
 4 yes, two Silvers and a Gold within the force
 5 headquarters.
 6 Q. So the plan that you're referring to there, where
 7 you were, I think, saying that you were cascading some
 8 of the FDO's responsibilities to the Strategic
 9 Coordination Centre plan within the SCC plan, that would
 10 mean that some of the responsibilities that the FDO had
 11 in a Plato incident would cascade to those working
 12 within the SCC; is that right?
 13 A. That's correct, yes. I can't remember the exact detail
 14 and I don't have a copy of the plan, but yes, the idea
 15 was that we would utilise some of the specialist cadre
 16 officers to make some of those phone calls.
 17 SIR JOHN SAUNDERS: I'm sorry to stop you, I just want to be
 18 assured by Mr Greaney that in dealing with locations
 19 we're not actually going into sensitive areas.
 20 MR GREANEY: The same thought was occurring to me. This is
 21 no fault of Mr Weatherby's. I know that Mr Mansell
 22 intends to ask questions on behalf of Greater Manchester
 23 Police and I think he will be best placed to indicate
 24 whether we are treading into areas of operational
 25 sensitivity.

1 Mr Weatherby, would you mind just pausing for one
 2 moment whilst I invite Mr Mansell on to the line?
 3 SIR JOHN SAUNDERS: It may be that Mr Weatherby is not going
 4 to go more into location than he already has.
 5 MR WEATHERBY: Absolutely not. Before Mr Mansell helps us,
 6 can I just clarify? I think it was established that the
 7 strategic command was at Force HQ. I don't think I've
 8 put anything into the public domain that hasn't already
 9 been put into the public domain. I was certainly going
 10 to go no further than that.
 11 SIR JOHN SAUNDERS: I'm grateful. Mr Weatherby, I'm not
 12 criticising you in any way, I may be being
 13 oversensitive.
 14 Mr Mansell, have we done anything wrong?
 15 MR MANSELL: I don't believe so, sir, no.
 16 SIR JOHN SAUNDERS: Thank you very much. Mr Weatherby, on
 17 we go.
 18 MR WEATHERBY: Thank you very much. I can deal with this
 19 very swiftly and then move on.
 20 You're talking about cascading some of the
 21 responsibilities in a Plato incident to the strategic
 22 command at HQ. It's right, isn't it, that the strategic
 23 command would take some time to set up in a Plato --
 24 A. It is, and we're not talking purely about a Plato
 25 incident, we're talking about any major incident when

1 the Strategic Coordination Centre or in fact the force
 2 command modules were opened. It started out as
 3 a Strategic Coordination Centre plan and morphed into
 4 a force command module activation, so there were five
 5 levels to the plan.
 6 Q. Okay. I'm not going to go into the plan and that's very
 7 helpful that you've clarified that. But before I move
 8 on, the cascading of FDO responsibilities within a Plato
 9 that would have been included in the work that you're
 10 referring to would necessarily have not been the initial
 11 response to the Plato incident, would it?
 12 A. Well, it would have been because the force (inaudible:
 13 distorted) special officer who was on duty would have
 14 had some actions, so the force duty officer would have
 15 had to contact them anyway in the event of a Plato and
 16 they would then have taken on some of the other actions
 17 around contacting operational planning staff, et cetera.
 18 Q. Yes, okay. So as one of the initial actions, the FDO
 19 would contact the strategic commander and then he or she
 20 would then be able to take on some of the
 21 responsibilities; that's as far as it goes?
 22 A. Tactical commander, not the strategic commander, so the
 23 force specialist cadre with tactical level, Silver
 24 level. And they would also have come (inaudible:
 25 distorted) ACPO, which is the strategic.

1 Q. Right, okay. The FDO is in fact the initial tactical
2 firearms commander. And you're referring to the fact
3 that somewhere down the line, the initial TFC appoints
4 a scene tactical commander, tactical firearms commander,
5 and also hands over to a duty tactical firearms
6 commander; yes?
7 A. Yes, correct.
8 Q. At what point in that chain does the cascading that
9 you're referring to kick in with this policy that you
10 were developing?
11 A. It would kick in quite early because the strategic --
12 sorry, the specialist cadre would have taken on one of
13 those roles, be it the incident -- the tactical firearms
14 commander at the incident or the tactical firearms
15 commander at the force command module.
16 Q. Right. So you're talking about the ground--assigned TFC
17 or the force command module TFC?
18 A. Yes, sorry, that's the phase I couldn't quite get in my
19 head.
20 Q. I'm sure it's my fault. Would you agree it would take
21 a little time for those two officers to deploy?
22 A. One of them would already have been on duty, but the
23 other one, yes, probably wouldn't have been on duty at
24 that point in time.
25 Q. I'll move swiftly on.

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1 SIR JOHN SAUNDERS: So I understand it, the Silver Commander
2 would be on duty at wherever at the particular time so
3 could become involved immediately? Is that right?
4 A. Yes. That's correct. We had a cadre of specialist duty
5 officers who were Silver level and could take control.
6 SIR JOHN SAUNDERS: Thank you.
7 MR WEATHERBY: I think we may be hearing from Mr Nawaz in
8 due course, who may be being referred to.
9 To round up that point, in fact in terms of the
10 Plato plans, you may or may not know this, but in fact
11 the Plato plans -- we've heard evidence certainly of the
12 final plan that was apparently in place at the time of
13 the arena bombing where in fact a lot more
14 responsibility or a certain amount more responsibility
15 was placed on the FDO. Is that something that surprises
16 you in the light of the evidence that you've given?
17 A. It does, yes.
18 Q. Can I pick up a point that Mr Greaney made and the chair
19 asked you a little about. It's the massive
20 responsibility point. That was your phrase in your
21 statement, and in your statement and your evidence you
22 told us that you were aware from very early in your
23 involvement with the operational communications branch,
24 the control rooms, of the massive responsibilities on
25 the FDO; yes?

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1 A. Yes.
2 Q. The chair made the point that the fact that somebody has
3 massive responsibilities doesn't in fact imply one way
4 or the other whether they're able to discharge them or
5 not. Many people have massive responsibilities but with
6 a proper structure in place they can discharge those.
7 That's a matter of common sense, isn't it?
8 A. Yes.
9 Q. Okay. So you had recognised this because of your work
10 in the operational communications branch, but in fact
11 although you'd never worked as an FDO, you had worked as
12 a supervisor in that area, so you'd had a close working
13 relationship with FDOs but not in fact done the job.
14 Later in your statement, we don't need to turn it up
15 unless it becomes apparent that we do have to, but for
16 the record at paragraph 23, you go on to say that you
17 were aware of the content and breadth of emergency plans
18 and that you had capacity concerns about the role of the
19 FDO. The period we're talking about there is 2008.
20 So certainly by 2008, both massive responsibilities
21 but also capacity concerns, yes, about the role of the
22 FDO?
23 A. Yes.
24 Q. So that's you, approximately maybe 9 years before the
25 arena bombing, and we have heard other evidence that it

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1 was a widespread understanding between management in the
2 Greater Manchester Police that there were capacity
3 problems with the FDO position. Is that something that
4 surprises you?
5 A. No, not at all.
6 Q. At paragraph 24 of your statement, you go on to say
7 that:
8 "The FDO was the only officer who could deal with
9 [a number of different functions] and they had to
10 understand the plans of who needed to turn out and that
11 a lot of their role involved the making and receiving of
12 telephone calls and it would be difficult to keep track
13 of the radio whilst doing all of that."
14 Are you there setting out some of the problems of
15 the capacity concerns or overloading of the FDO that you
16 perceived at that time? Is that right?
17 A. Yes.
18 Q. Given that the position at that time was that there was
19 a real need -- the position was crying out for
20 a solution, wasn't it, given the centrality of the FDO
21 in these incredibly dangerous situations that from time
22 to time they might have to deal with? This was an issue
23 that really ought to have been dealt with; do you agree
24 with that? Again, I'm not criticising you, it's
25 a general proposition.

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1 A. In my opinion, yes. Way above my pay grade.
 2 Q. Yes. As I say, I'm not being critical of you, I'm just
 3 seeking your help as somebody who was there, involved
 4 both in the operations communications branch, knowing
 5 the position with the FDO, and also being involved in
 6 emergency planning.
 7 In fact, around that time, just to complete the
 8 picture, there was the allocation of a force duty
 9 supervisor to assist the FDO; isn't that right?
 10 A. They did instigate an FDS role. I don't know when that
 11 was, I'm sorry.
 12 Q. In terms of this capacity problem or the overloading,
 13 you made the point that the FDO is at the centre of
 14 these responsibilities. Would you agree with me, again
 15 as a general point, the point of planning and plans is
 16 to identify and set out what responsibilities are, what
 17 needs to happen in an emergency situation?
 18 A. Yes.
 19 Q. Secondly, the plan needs to set out not just
 20 responsibility but how those responsibilities are going
 21 to be discharged; yes?
 22 A. No, I think that's a little bit too specific.
 23 Q. Well, if a plan sets out what needs to happen but gives
 24 those responsibilities mainly to one person and
 25 everybody knows that there's a potential point of

1 failure there, then the plan should assist that person,
 2 shouldn't it, in terms of how those tasks might be
 3 delegated or split between people under their control?
 4 A. No, I'm sorry, I disagree. That's like saying the
 5 chief constable has to go to every single incident that
 6 Greater Manchester Police attend. The chief constable
 7 has overall responsibility for policing
 8 Greater Manchester, which he delegates. The force duty
 9 officer has a list of responsibilities there, which they
 10 can delegate to other officers under their command.
 11 They have the overall responsibility for achieving those
 12 objectives, but they can be delegated to other people.
 13 Q. Yes, okay.
 14 A. And it is (inaudible: distorted) for everyone else to
 15 tell the FDO that they will delegate.
 16 Q. Let me just put it a different way and then I'll move
 17 on. If the FDO is allocated a number of, a long number
 18 of tasks which everybody who is engaged with the
 19 management of this position is aware of and historically
 20 is a list which potentially can lead to problems and
 21 overloading, if something goes wrong is it the fault of
 22 the FDO in failing to delegate or is it a failure of the
 23 planning in working out who should do what in the heat
 24 of the moment, or both?
 25 A. Probably both. But every situation is different.

1 Q. Yes.
 2 SIR JOHN SAUNDERS: Mr Weatherby, I hope we have identified
 3 an issue which is: should the delegation be
 4 pre-delegation, whoever's job it is to do it, or is it
 5 just something that should be left to the night as we're
 6 going along? I'm aware of that issue.
 7 MR WEATHERBY: Thank you. One connected issue but I'm
 8 moving on from that.
 9 You have referred to support for the FDO and there
 10 are various other people of different training and
 11 positions within the control rooms. You've already
 12 referred to them having, or at least some of them
 13 having, had major incident training. That's right,
 14 isn't it?
 15 A. Yes.
 16 Q. So you were making the point, I think, that in terms of
 17 helping the FDO there were staff around, some of them
 18 supervisors, some of them radio operators, some of them
 19 control room telephone operators, but some of them at
 20 least had major incident training, which would be useful
 21 in assisting the FDO?
 22 A. I can't say whether the officers had received major
 23 incident training. I can tell you that when I was
 24 in the operational communications branch, as
 25 a supervisor (inaudible: distorted) incident training

1 and it was being rolled out to radio operators and
 2 call-takers, et cetera. I think it stopped, but I don't
 3 know at what point.
 4 Q. Would that be part of the cuts?
 5 A. I'm not sure, to be honest with you. Quite possibly.
 6 Q. So if people in the operations communications branch,
 7 the control rooms, had had major incident training then
 8 your point is that that would make them more useful to
 9 the FDO in terms of delegation and assisting with tasks?
 10 A. They would certainly have an understanding as to
 11 what was expected, yes.
 12 Q. In a Plato situation, it would, as night follows day,
 13 wouldn't it, make a big difference if staff had been
 14 trained on the Plato response?
 15 A. Not necessarily, because the Plato response isn't
 16 massively different to a major incident response.
 17 I can't imagine that the FDO would be delegating --
 18 I don't know -- some of the particular firearms
 19 responsibilities to their staff: they are their
 20 responsibilities and they would have to do them. But
 21 the other things like contacting NILOs and contacting
 22 partner agencies are the same in any plan, they're the
 23 same in a major incident plan.
 24 Q. Yes, okay. I'll move on from that then --
 25 SIR JOHN SAUNDERS: Mr Weatherby, before you move on, if

1 I can just take this opportunity. Can I just ask
 2 something? I've heard somewhere, or I've read
 3 somewhere, that the FDO, as well as all these other
 4 things he was doing, calls from the press would actually
 5 come through to his line. Is that something you're
 6 aware of or have I got that wrong?
 7 A. No, no, you're absolutely correct. You've probably read
 8 it in the FDO script because we scripted some calls from
 9 the press in Winchester Accord to try and, again,
 10 replicate reality. So the press did have the FDO's
 11 number, to the best of my knowledge.
 12 SIR JOHN SAUNDERS: Okay. I'm certainly not trying to
 13 minimise the importance of the press, particularly with
 14 a number of them listening today, obviously it's
 15 important they know what's going on, but that would
 16 appear to be something which could perhaps be
 17 permanently delegated.
 18 A. Yes, quite possibly, providing the person it was
 19 delegated to knew enough about the incident to be able
 20 to respond to the press enquiries. But yes, I think
 21 that would only be in the stages before the GMP Media
 22 Department was activated.
 23 SIR JOHN SAUNDERS: The early stages are in some ways the
 24 most critical, aren't they?
 25 A. Yes, absolutely.

1 SIR JOHN SAUNDERS: Okay. But that was not thought about,
 2 thought of, considered? Because there could be a lot of
 3 calls, couldn't there?
 4 A. Sorry, in relation to delegating FDO duties, is that
 5 what you're asking?
 6 SIR JOHN SAUNDERS: Yes. That they immediately are
 7 automatically delegated to someone else within there who
 8 no doubt would have to be briefed what he or she could
 9 say to the press, but that would take that off the FDO,
 10 because the FDO — they'd have to pick up a phone and
 11 they wouldn't know where they're coming from perhaps.
 12 A. Yes, that's something they could quite easily have
 13 delegated.
 14 SIR JOHN SAUNDERS: Okay. Sorry, Mr Weatherby, I won't
 15 interrupt again.
 16 MR WEATHERBY: That's very helpful, thank you.
 17 In terms of the point I was making about the Plato
 18 training and the usefulness for the control room staff,
 19 were you ever informed of the debrief or the feedback
 20 from the HMIC review later in 2016?
 21 A. No.
 22 Q. One of the points that we've heard that was raised on
 23 that was the lack of awareness in the control room staff
 24 as to what to do in a Plato incident. I'll move on from
 25 that.

1 Winchester Accord. You had been asked a number of
 2 questions, I'm going to come back to them and deal with
 3 them very quickly, but particularly by Mr Smith before
 4 me, about some serious failures in the actions of the
 5 FDO at that exercise. You recognise that, don't you?
 6 A. Yes.
 7 Q. Would it be fair to say that one of the things that
 8 you were particularly concerned about was this move of
 9 the FDO to the HQ?
 10 A. That's correct, yes.
 11 Q. Proposed move, yes. And that was one of the things that
 12 you had an eye on. Would it be fair to say that the
 13 role of the FDO and the way it was dealt with in
 14 Winchester Accord, there was a preoccupation with that
 15 issue rather than this well-known issue of overloading
 16 the FDO?
 17 A. The objectives in Winchester Accord were to test — were
 18 to exercise that proposed move.
 19 Q. In a way the eye was taken off the ball, that the
 20 obvious overloading of the FDO became secondary to the
 21 effect of moving the FDO from the control room to the
 22 HQ?
 23 A. Not at all, because if the FDO had moved to the HQ,
 24 then, as was proved in the exercise, the overloading
 25 would have been even worse.

1 Q. Even worse, but overloading there most certainly was,
 2 wasn't there, and that was what happened within the
 3 Winchester Accord exercise? Is that fair?
 4 A. Yes.
 5 Q. And even within the context of a highly organised
 6 exercise, with prompters in the wings, even with that,
 7 the exercise went catastrophically wrong in terms of the
 8 multi-agency response, didn't it?
 9 A. It would appear so, yes.
 10 Q. Mr Greaney has put to you the view of the
 11 Ambulance Service that if this had been a real-life
 12 scenario, the failures would have led to further loss of
 13 life. I'm summarising, but that's what was put to you,
 14 yes, and you'd agree with that?
 15 A. Yes, I can't disagree with that at all.
 16 Q. In fact, the Fire and Rescue Service officer involved
 17 that you've been referred to, Mr Gaskell, he's going to
 18 give evidence later, and in his statement he makes the
 19 same point that if this had been a real-life scenario,
 20 the failure to call up the Ambulance and Fire and Rescue
 21 Service for 2 hours and 20 minutes would be likely to
 22 lead to further loss of life. So a catastrophic
 23 failure?
 24 A. Yes.
 25 Q. We've looked at the debriefing and some of the

1 recommendations. I'm not going to take up time by going
2 back to them. The chair has seen them and can make his
3 own mind up.
4 Can you just help us at a general level? First of
5 all, was there real concern in Greater Manchester Police
6 about the failure to call up the Fire and Rescue Service
7 and the Ambulance Service in Winchester Accord?
8 A. In Winchester Accord? I wasn't aware that the FDO
9 hadn't contacted them until much later in the exercise
10 and I think that was just a passing comment that someone
11 said to me. So during the exercise, it obviously
12 affected the exercise, but I wasn't aware of it. Later
13 on, yes, it's a real concern that they weren't contacted
14 as they should have been.
15 Q. And can you help us with what was done about that?
16 A. I'm sorry, I can't. As I've already explained, I had
17 stepped away from the contingency (inaudible: distorted)
18 at that point in time.
19 Q. So you'd expect, just to help us — who were the key
20 players in GMP that you would expect to pick that up?
21 Let me just throw a couple of names at you to try to
22 assist. You'll agree or not depending on whether I'm
23 right. Mr Giladi, at the time the head of the firearms,
24 responsible for the Policy and Compliance Unit, he took
25 part in Winchester Accord debriefs, I think. You'd

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1 expect him to take up an issue as central as that, would
2 you?
3 A. Yes.
4 Q. Mr Booth, Chief Inspector Booth, I think responsible for
5 the control rooms at that time. Again involved in
6 Winchester Accord. You'd expect him to be particularly
7 concerned, wouldn't you?
8 A. Yes, and he had actions allocated to him from the
9 debrief.
10 Q. Just to finish on this point, and again I'm not being
11 critical of you, but you were one of the people involved
12 in the running of Winchester Accord, weren't you?
13 A. Yes.
14 Q. You refer at paragraph 36 of your statement:
15 "I was not a player during the exercise, I was
16 roving around in FHQ and coordinating the exercise
17 activity. While I was walking around, I remember
18 somebody, I cannot recall who, telling me that they had
19 not received an activation phone call from the FDO and
20 my own impression was that the FDO managed extremely
21 well under the circumstances."
22 Again, I'm not asking you to be critical of the FDO
23 in that exercise, that's beyond what really we're
24 looking at, but the FDO role in that exercise didn't go
25 extremely well, did it?

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1 A. It doesn't appear so, sir, no.
2 Q. And was it really just somebody telling you that they'd
3 not received an activation phone call or was it really
4 something far more serious than that, that your two
5 partner agencies hadn't been told at all?
6 A. I'm sorry, I don't understand what you're asking me.
7 SIR JOHN SAUNDERS: I understand that from — were you told
8 anything rather more serious than you put in your
9 statement? Did you know at the time during the exercise
10 going on that there had been this really pretty awful
11 failure because the people hadn't been moved forward or
12 is that something you learned later?
13 A. It's something I learned later. If I'd have known that
14 that had happened, I would have gone into (inaudible:
15 distorted) area and assisted they inform the various
16 people because that was part — it's a major part of the
17 sequence of events that they need to get brought forward
18 so that we can train them and exercise them.
19 Unfortunately, the ODU were more interested in military
20 relicensing than they were in multi-agency exercising.
21 MR WEATHERBY: Yes. I'm almost finished. Just on this
22 point, the multi-agency aspect of this wasn't something
23 that was taken terribly seriously, was it, by GMP?
24 A. I would disagree. If it wasn't being taken seriously,
25 we wouldn't have had any multi-agencies present.

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1 Q. Well, in fact, as it happened, you didn't, did you, for
2 2 hours and 20 minutes?
3 A. (inaudible: distorted).
4 SIR JOHN SAUNDERS: This is getting into rather unhelpful
5 questions as far as I'm concerned.
6 MR WEATHERBY: Okay. That's all I have then. Thank you
7 very much.
8 SIR JOHN SAUNDERS: Thank you very much, Mr Weatherby.
9 MR GREANEY: Sir, Mr Cooper indicated before he had heard
10 the questions of Mr Weatherby that he might have a small
11 number of questions of his own, so can I ask Mr Cooper
12 whether that remains the position, please.
13 Questions from MR COOPER
14 MR COOPER: They have reduced even further, I can reassure
15 the hearing. But may I have 5 minutes, please, and that
16 should clear up a few outstanding matters? Thank you.
17 Again, I ask questions, Ms Roby, on behalf of the
18 families. We have heard evidence, so far as
19 Winchester Accord is concerned, that a police inspector
20 at the inner cordon at the Trafford Centre would not
21 allow Fire and Ambulance Service personnel into the
22 inner cordon. Were you aware of that?
23 A. No, I've only become aware of that whilst reading
24 documents for the inquiry.
25 Q. Do you know who it was, who that police inspector was?

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1 A. I could find out from the exercise participant list .
 2 Q. Thank you. Effectively, are you aware now that that was
 3 a direct cause of at least the 1.5-hour delay that
 4 we have heard of in this operation?
 5 A. I think it was one of the causes. I would imagine that
 6 the FDO not making the phone call was another one.
 7 Q. That's a fair answer. You gave us information
 8 concerning a previous force who was due to take part in
 9 Winchester Accord and could not. Which force was that,
 10 please?
 11 A. I'm sorry, I've no idea.
 12 Q. Do you know why they couldn't take part, what it was
 13 that caused them to have to withdraw?
 14 A. I don't, but I suspect it was probably something going
 15 on nationally at that point in time. As you'll be
 16 aware, there were a lot of national and international
 17 incidents happening around that time. I would imagine
 18 it was something to do that, but that's just me
 19 guessing.
 20 Q. So we can assume, can we, that the cause for them having
 21 to withdraw from Winchester Accord was a very serious
 22 matter and certainly required their withdrawal? Can we
 23 assume that safely?
 24 A. I would make that assumption, yes, because forces did
 25 like to participate in military relicensing. It was

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1 a bit of a bun fight actually to try and get yourself on
 2 the road to the military relicensing .
 3 Q. I see. Again, it is subject to the chair's discretion ,
 4 but if you can find out for us what the reason was that
 5 the force, on your evidence, put you into a little bit
 6 of a bounced situation, that would be very helpful.
 7 A. I'm afraid it's not something that I would be able to
 8 find out for you. I'm retired, I don't have any
 9 contacts with the North-west CTU now (overspeaking).
 10 SIR JOHN SAUNDERS: Mr Cooper, we'll try and find out if
 11 we can and then we'll let you know if it's relevant.
 12 MR COOPER: Thank you, sir.
 13 A. I would imagine that Mr Barlow may be able to assist if
 14 you're calling him at any point.
 15 MR COOPER: I'll leave that as a matter with the chair and
 16 we'll deal with it .
 17 Let me move on to a number of short matters. It
 18 concerns material which is in your second statement.
 19 I don't need you to refer to it unless you want to. But
 20 it's at paragraph 7, it's {INQ036860/1}.
 21 It's your paragraph 7 dealing with Operation Sherman
 22 or the Exercise Sherman, 26 July 2016. It's just your
 23 references to the City Room, which you can understand is
 24 of particular interest to those we represent. You say:
 25 "The City Room was not seen particularly as

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1 a target. It was selected merely because it was part of
 2 the area surrounding the station."
 3 Why was it at the time, in July 2016, that the
 4 City Room was not, as you put it, particularly seen as
 5 a target?
 6 A. I meant any more than any other crowded place in the
 7 city centre, essentially. There are lots of crowded
 8 places in the city centre, all of which could have been
 9 targets, and the City Room was no more or less than any
 10 of the others. But we had exercised quite a few of the
 11 other areas within the city centre previously. We
 12 hadn't exercised the City Room and the arena and the
 13 station, so that was chosen.
 14 Q. Were there not particular concerns, for instance, about
 15 the juxtaposition of the City Room to the station and
 16 the complexities we've heard already about in chapter 7
 17 of people moving into grey areas and that sort of thing?
 18 Did that not mean that perhaps the City Room might have
 19 been a target or might have been an area of particular
 20 complexity needing attention?
 21 A. Not that I'm specifically aware of. I think we chose
 22 that particular venue because of some concerns about the
 23 interaction between GMP and BTP and how that would play
 24 out. But I didn't actually choose that venue, it was
 25 chosen by my staff and the AGMA staff. I had no

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1 objections.
 2 Q. What do you mean, the concerns between interaction
 3 between GMP and BTP?
 4 A. For me personally, that was always a bit of a grey area
 5 around who had responsibility for what and how that
 6 would play out in a major incident and I wanted to
 7 examine that and make sure that our plans were correct
 8 in relation to who was doing what and when.
 9 Q. When you say "for you", would you agree not only for you
 10 then, given that you've highlighted it as a concern for
 11 you, it was a concern in the higher echelons of both
 12 organisations or just GMP?
 13 A. I can't answer that question. I have no idea. I wasn't
 14 operational and had never been operational on that
 15 particular division, so I'd never had operational
 16 experience of interaction with BTP at either of the two
 17 stations, but for me, reading a plan, it looked a bit
 18 grey and I wanted to make it clear so that the plan
 19 could be made clear.
 20 Q. And did Sherman clarify that for you or did it throw up
 21 any further concerns that needed to be dealt with
 22 in relation to GMP and BTP?
 23 A. I can't recall, but I'm sure it probably clarified a few
 24 of the areas I had concerns about. I can't recall
 25 whether it clarified it completely or not, sorry.

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1 Q. It's a general question, really linked in to that
 2 section of questioning I was asking of you. We've heard
 3 throughout evidence, not just your evidence, Ms Roby,
 4 that there were certain policies initiated generally and
 5 certain policies that were either inadequate or
 6 misunderstood. Is the truth, I put this to you, is the
 7 truth here really that the police never really thought
 8 that there was going to be a terrorist attack such as
 9 that that occurred on 22 May 2017? Was the reality that
 10 the police never really examined this attack, which is
 11 why the policies perhaps were, I suggest, so inadequate?
 12 A. No, I disagree. I think Mr Whittle said in his
 13 evidence, and I agree with him entirely, I started every
 14 single exercise with: this is not a case of if this
 15 happens, for me it's a case of when this happens. There
 16 was so much going on in the world that
 17 Greater Manchester cannot remain this little bubble
 18 where nothing happens, we are going to get something at
 19 some point.
 20 Q. This is the last couple of questions on Sherman.
 21 I would just like to understand attendees and observers.
 22 I have seen your paragraph 12. In short, what was the
 23 criteria for being an attendee and what was the criteria
 24 for being an observer, because clearly attendees had far
 25 more input, didn't they?

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1 A. Yes. In my opinion, they were all attendees. Observers
 2 wouldn't generally sit at a table outside the room. So
 3 as far as I was concerned they were all attendees and
 4 had every opportunity to provide an input.
 5 Q. Do I understand by that that those that weren't
 6 attendees, I'm going to go no deeper into it, ie
 7 observers, did not have a right to input into the
 8 process?
 9 A. Not at all. Everyone had a right to input into the
 10 process. I had an expectation that attendees would
 11 input.
 12 Q. So why the difference between attendees and observers?
 13 Why not simply say all attendees?
 14 A. Good question, I suppose. As I say, I had an
 15 expectation that attendees would have an input, that
 16 they would have something important to say, and
 17 observers would — sorry?
 18 Q. Sorry, it's my fault, I talked across you and the system
 19 just doesn't like that. Observers what? Attendees
 20 obviously have input, but observers what?
 21 A. Observers for me were there to learn, but if they had
 22 a question, I was always more than happy to take it. In
 23 fact at the end of every plenary session I would open up
 24 to the room: do you have any burning issues that hasn't
 25 been addressed within this session that you want to

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1 raise? So everyone was given an opportunity.
 2 Q. Last question. The lessons and the findings, for
 3 instance, of Sherman. You explained what happens at the
 4 end of it. How are these findings and lessons, for
 5 instance from Sherman, cascaded down or indeed upwards
 6 to people after the event?
 7 A. We invite the exercise attendees to fill in a feedback
 8 form and actually the observers get a feedback form as
 9 well. We collate all of those feedback forms on to
 10 a spreadsheet and pull out any major observations that
 11 have been made that would lead into a recommendation.
 12 Those recommendations then get placed on to the
 13 recommendations tracker. If it's a multi-agency
 14 recommendation, it would go to the Resilience
 15 Development Group and then up to the GMRF group to look
 16 at those recommendations and do with them what they felt
 17 was required. If it was an internal single agency
 18 recommendation, from a police point of view that would
 19 go to the Major Incident and Public Order Steering Group
 20 for them to deal with and action out as required.
 21 Q. Can I suggest to you that's quite a convoluted process
 22 by which, perhaps, important messages might be lost or
 23 diluted during that process.
 24 A. No one came up with a better idea.
 25 Q. Well, cutting the process down to direct contact with

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1 direct people who should know what's going on rather
 2 than, as it were, having a filtering process that could
 3 filter it down to nothing, potentially?
 4 A. It wasn't a filtering process, so they didn't — they
 5 weren't generally invited to take out recommendations,
 6 they were invited to adopt them or action them out, or,
 7 if they weren't going to do something about it, the idea
 8 was that you would have a paper trail, an audit trail as
 9 to the recommendation and why the decision was not to
 10 adopt it. Because those meetings were minuted that
 11 audit trail would be within the minutes.
 12 MR COOPER: I don't think I can take it any further than
 13 that, sir, thank you.
 14 MR GREANEY: Mr Atkinson indicated recently that he may have
 15 what he described as very few questions, so could I ask
 16 him whether that remains the position?
 17 We can't hear you, Mr Atkinson, I'm afraid.
 18 (Pause)
 19 SIR JOHN SAUNDERS: We still can't hear you, I'm afraid, and
 20 we can't lip-read that well.
 21 (Pause)
 22 SIR JOHN SAUNDERS: It's being suggested you dial out and
 23 dial back in. Is that possible for you to do?
 24 MR GREANEY: Sir, in the meantime, there was one short
 25 matter that I was going to ask about, which arises out

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1 of the evidence that Ms Roby has just given. It'll be
 2 very short.
 3 SIR JOHN SAUNDERS: And it may be we can deal with
 4 Mr Mansell's questions, allowing him to come back after
 5 Mr Atkinson.
 6 Further questions from MR GREANEY
 7 MR GREANEY: Ms Roby, this is just a very short point. You
 8 referred to the fact that your office would create
 9 trackers for all exercises; have I understood correctly?
 10 A. For GMP exercises and any that were run under the
 11 auspices of the TCG, yes.
 12 Q. And this was a way of identifying what needed to be done
 13 and checking whether it thereafter had been done?
 14 A. That's correct, yes.
 15 Q. There was such a tracker created in respect of Exercise
 16 Winchester Accord; is that correct?
 17 A. I would imagine so, yes.
 18 Q. And I'm just going to ask you about what I think is that
 19 document. Mr Lopez, it's {INQ007536/1}.
 20 Are we looking, Ms Roby, at a tracker in relation to
 21 Exercise Winchester Accord?
 22 A. Yes, you are.
 23 Q. Could we go to line 25, which is on {INQ007536/3},
 24 please.
 25 This line appears to be referring to paragraph 17,

1 which we looked at earlier, and what was being
 2 identified was:
 3 "Additional support for the FDO would have helped
 4 and would be necessary in the event of a real incident."
 5 Is that correct? So this is what needs to be done?
 6 A. Yes, that's correct.
 7 Q. That was allocated to Chief Inspector Mike Booth. The
 8 entry that follows is:
 9 "Complete. FDS number provided to GMP planners for
 10 plans to be updated and to LRF for multi-agency
 11 planners."
 12 Is that correct?
 13 A. That's what it says, yes.
 14 Q. So does it appear that Chief Inspector Booth and/or
 15 possibly others had identified, following Exercise
 16 Winchester Accord, in relation to the FDO issue, only
 17 the need to provide the number for the FDS to planners
 18 and to the Local Resilience Forum?
 19 A. That's what it appears, yes.
 20 SIR JOHN SAUNDERS: FDS is the force duty supervisor?
 21 MR GREANEY: Yes.
 22 SIR JOHN SAUNDERS: Thank you.
 23 MR GREANEY: I just wanted to be clear about that.
 24 SIR JOHN SAUNDERS: And the date of that document? Well,
 25 we can find that out.

1 MR GREANEY: We can find that out. Sorry, I don't know
 2 immediately.
 3 SIR JOHN SAUNDERS: Before we lose Mr Atkinson again.
 4 MR GREANEY: Hopefully I've managed to give Mr Atkinson time
 5 to get his equipment in order.
 6 MR ATKINSON: I'll test again. Can you hear me this time,
 7 sir?
 8 SIR JOHN SAUNDERS: We can, very good, Mr Atkinson.
 9 Questions from MR ATKINSON
 10 MR ATKINSON: Marvellous, and I'll be able to order you
 11 a taxi with this headset at the end of these questions.
 12 Ms Roby, just going back to GMRF and its role,
 13 clearly one of the purposes of multi-agency exercises is
 14 for there to be multi-agency learning from them.
 15 A. That's correct.
 16 Q. And clearly, GMRF was in a position to encourage such
 17 multi-agency learning. I just want your help as to how
 18 active it actually was in doing that from your
 19 experience of it.
 20 We can see, and I'm not going to take you to them,
 21 that there are occasions in the minutes of the main GMRF
 22 where training exercises are touched on,
 23 Winchester Accord being an example, but without any real
 24 analysis or detail as to what the learning points were.
 25 Does that accord with your experience?

1 A. The GMRF meeting was a strategic meeting. We wouldn't
 2 have expected them to go into too much detail about the
 3 recommendations. I would have expected that to happen
 4 at the RDG meeting, which was the tactical meeting.
 5 Q. And assuming that to be the case, if the concerns for
 6 example with Winchester Accord reached the RDG, what
 7 should then have happened to make sure that there was
 8 a multi-agency learning from those problems?
 9 A. I would have expected them to allocate actions
 10 in relation to those recommendations.
 11 Q. But in terms of those who needed to know that the
 12 problems had been identified and therefore to make sure
 13 that their emergency service dealt with it, how was that
 14 meant to happen?
 15 A. The RDG meeting had representation from all the
 16 category 1 and 2 responders and so they would -- if they
 17 weren't at the meeting, they would have had the minutes
 18 and they would be able to see what was discussed and
 19 what actions came out of those meetings.
 20 Q. So for the chair to have a proper appreciation of what
 21 role GMRF was playing in this, it's necessary to look
 22 both at the minutes of the main group but, more
 23 particularly perhaps, at the meetings of the RDG to see
 24 how much attention was there being given to these
 25 problems that were coming up from exercises?

1 A. I would say so, yes. The RDG was, as I say, the
 2 tactical arm of the LRF. GMRF was the more strategic
 3 arm, so they didn't (inaudible: distorted).
 4 MR ATKINSON: Thank you, sir. For all the trouble it's
 5 taken, that's all I needed to raise.
 6 MR GREANEY: Mr Mansell may have questions. Can I check
 7 whether he does?
 8 MR MANSELL: I do, no more than 10 minutes.
 9 MR GREANEY: I think we're fine to carry on, sir.
 10 Thank you, Mr Mansell.
 11 Questions from MR MANSELL
 12 MR MANSELL: Thank you. Can you hear me, Ms Roby, and see
 13 me?
 14 A. I can, thank you.
 15 Q. I'm going to deal with these as briefly as possible,
 16 please. The first topic is the objectives for
 17 Winchester Accord. I don't want to stray into any
 18 operationally sensitive areas, so please confine your
 19 answers at the outset to yes or no.
 20 The exercise was owned by the military; is that
 21 right?
 22 A. Oh, I'm not sure. Either them or the Counter—terrorism
 23 Unit, ODU, one or the other.
 24 Q. But the primary purpose of the exercise was to relicense
 25 military assets; is that right?

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1 A. That's correct.
 2 Q. You've explained that the agencies involved were invited
 3 to set their own objectives; yes?
 4 A. Yes.
 5 Q. And one of the GMP objectives was to test the proposed
 6 move of the FDO from the operational control room, or
 7 OCR, to GMP force headquarters?
 8 A. That's correct.
 9 Q. To be absolutely clear, did the exercise recreate the
 10 level of support the FDO had in the OCR at the time or
 11 not?
 12 A. Not at all.
 13 Q. You deal with this in your first statement -- it doesn't
 14 have to come up on the screen, but it's paragraph 32 for
 15 your reference -- and you say this:
 16 "The set-up for the FDO during Exercise
 17 Winchester Accord and the set-up for the FDO during
 18 a real major incident at the time are not comparable.
 19 Some roles are comparable, but the location of and the
 20 support available to the FDO were not comparable. The
 21 FDO would have had more support in the operational
 22 control room."
 23 Is that right?
 24 A. That's correct, yes.
 25 Q. I won't take you to it now because Mr Smith did this,

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1 but he took you to the next paragraph, where you deal
 2 with the additional support which would have been
 3 actually available to the FDO at the time.
 4 What was the central lesson about the FDO that you
 5 drew from Exercise Winchester Accord?
 6 A. I think it was mainly around the proposed relocation.
 7 Q. You may not be able to help us with this because you
 8 weren't in the OCB at the time, but were you aware that
 9 Winchester Accord led to a review of the proposed move
 10 of the FDO to force headquarters and how that would be
 11 achieved to ensure sufficient support?
 12 A. I would like to think it did, but I'm not aware that it
 13 did.
 14 Q. Perhaps something you wouldn't be aware of in any event?
 15 A. I would probably have become aware of it at some point,
 16 just because of the personalities within our office and
 17 the various roles that they undertook.
 18 Q. Back to your witness statement, again it doesn't have to
 19 come up on the screen, and paragraph 35. You say at the
 20 end of that paragraph:
 21 "It would not have been possible to test the real
 22 capacity of the FDO as it would have meant closing down
 23 the OCB."
 24 Is that right?
 25 A. Certainly one of the rooms within the OCB, yes. We'd

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1 have had to replicate all of the staffing within that
 2 room.
 3 Q. At the time was the OCR running 24/7?
 4 A. Yes.
 5 Q. Would the FDO and surrounding staff be dealing with all
 6 manner of incidents around the clock?
 7 A. Yes.
 8 Q. Second topic, connected, the Winchester Accord debriefs.
 9 You've been asked about the internal GMP debrief and if
 10 we could have this up on the screen, please, Mr Lopez.
 11 It's {INQ007697/1}.
 12 Can you confirm that this is the internal GMP
 13 debrief report?
 14 A. Yes.
 15 Q. It may seem an obvious question, but were all the
 16 debrief participants that we can see there on that first
 17 page internal GMP staff?
 18 A. There's one that I'm not sure of, but other than that,
 19 yes.
 20 Q. Would you expect them to be?
 21 A. Yes.
 22 Q. Would you expect other agencies to conduct their own
 23 internal debriefs or not?
 24 A. Yes, I would.
 25 Q. Would you expect an internal debrief like this one to,

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1 as a matter of course, go to the GMRF or not?
 2 A. No, I wouldn't.
 3 Q. How, if at all, do internal debriefs feed into the
 4 multi-agency debrief?
 5 A. One of the participants at the internal structured
 6 debrief would be a participant at the multi-agency
 7 structured debrief and would bring points from the
 8 internal to the multi-agency one, where they affected
 9 the multi-agency response.
 10 Q. We can turn then, please, to the multi-agency debrief
 11 report, which is, if we could have this on the screen,
 12 {INQ004521/1}.
 13 Is this the multi-agency debrief, Ms Roby?
 14 A. Yes.
 15 Q. We can see there that the debrief has been commissioned
 16 by the GMRF; is that right?
 17 A. That's correct.
 18 Q. Again, would you expect all the debrief participants for
 19 this multi-agency debrief report to be representatives
 20 from the various agencies involved in the exercise?
 21 A. Yes, I would. Everyone would have been invited. It
 22 depends whether they were available to attend, but
 23 everybody would have been invited.
 24 Q. I don't think we need these documents up on the screen,
 25 but did you present the multi-agency debrief report to

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1 the GMRF Resilience Development Group meeting on
 2 21 July 2016?
 3 A. Yes.
 4 Q. For the record that's {INQ012471/5}.
 5 Then following that, was the multi-agency debrief
 6 report approved by the wider GMRF at a meeting on
 7 16 September 2016?
 8 A. Yes.
 9 Q. Again, for the record, that's {INQ012412/5}.
 10 Ms Roby, was the GMRF made aware of the issues
 11 arising out of Winchester Accord or not?
 12 A. As per the debriefs, yes.
 13 Q. Third topic, and final topic, please, the rank of GMP
 14 officers attending GMRF meetings. On occasions, more
 15 senior officers were unable to attend GMRF meetings;
 16 is that right?
 17 A. That's correct.
 18 Q. In those circumstances, where you had attended, what
 19 steps, if any, would you take to inform the more senior
 20 officer who'd been unable to attend what had happened
 21 at the meeting?
 22 A. I would brief them. They would get a copy of the
 23 minutes anyway, so they'd be able to see for themselves,
 24 but if anything came up that I felt needed their
 25 immediate attention, I would brief them about it.

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1 SIR JOHN SAUNDERS: So you would brief the ACC, would you?
 2 A. Yes. We had a close working relationship with the ACC
 3 that was in charge of specialist operations and, yes,
 4 I would quite happily walk up to their office and brief
 5 them.
 6 SIR JOHN SAUNDERS: Thank you.
 7 MR MANSELL: Thank you, sir. That's all I ask.
 8 SIR JOHN SAUNDERS: Just stay there for a moment.
 9 I just want your comment on this, Ms Roby. You have
 10 told us now a number of times how Winchester Accord, one
 11 of its objectives, was to test whether the FDO could be
 12 moved into headquarters and whether that would work and
 13 the conclusion was, well, no, it wouldn't because it
 14 wouldn't get sufficient support, so unless you did
 15 something about that, it wouldn't work. So everyone
 16 said, okay, it didn't work there but the reason for
 17 that is you haven't got enough support, he's in the
 18 wrong place.
 19 I wonder whether that helped to mask what was
 20 actually the real underlying problem that even in the
 21 OCR he wouldn't have enough support unless it was
 22 somehow structured differently.
 23 A. Quite possibly, yes.
 24 SIR JOHN SAUNDERS: Okay. Thank you.
 25 Mr Mansell, do you want to come back on that at all?

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1 MR MANSELL: No, thank you, sir.
 2 SIR JOHN SAUNDERS: Thank you very much.
 3 Ms Roby, I'm extremely grateful to you for your
 4 evidence. I have understood a number of things a great
 5 deal better as a result of listening to it, so thank you
 6 very much for your help.
 7 It does seem to me, bearing in mind the difficulties
 8 of having questioners and answers doing so over the
 9 link, that it's worked remarkably well, so I'm very
 10 grateful for the IT again for that.
 11 MR GREANEY: Thank you very much indeed, sir. As you will
 12 recognise, we've now concluded all of the evidence that
 13 we had scheduled for this week. Can I indicate very
 14 briefly what we will be dealing with next week or hope
 15 to deal with.
 16 On Monday, we will hear evidence from
 17 Margaret Gillespie of the Ministry of Housing,
 18 Communities and Local Government, who will help us
 19 in relation to the concept of the Local Resilience
 20 Forum. We'll also hear from Brigadier John Hodgetts,
 21 who is chair of trustees of CitizenAID and senior health
 22 adviser to the army.
 23 On Tuesday and Wednesday, we have scheduled a number
 24 of firefighters. On the current time estimates that
 25 we've been provided with, pursuant to the Rule 10

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1 procedure, if people's questions run for as long as they
 2 have bid for, if I can put it that way, we will not get
 3 through all the evidence we have scheduled for Tuesday
 4 and Wednesday. I'm not asking you to say or do anything
 5 at the moment, sir, I'm simply indicating to core
 6 participants that they can expect a telephone call from
 7 me today or tomorrow to discuss how the evidence is
 8 going to be handled.

9 SIR JOHN SAUNDERS: Okay. Thank you very much for that.
 10 I hope it has worked for those who have come back into
 11 the hearing room this week and I hope none of you catch
 12 anything as a result. Thank you.

13 (1.17 pm)
 14 (The inquiry adjourned until Monday, 1 March 2021)

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