

OPUS2

Manchester Arena Inquiry

Day 98

May 6, 2021

Opus 2 - Official Court Reporters

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Thursday, 6 May 2021

1
2 (9.30 am)
3 CHIEF INSPECTOR DALE SEXTON (continued)
4 Questions from MR GREANEY (continued)
5 MR GREANEY: Sir, good morning. We'll return to the
6 recording, of which there's about 5 minutes left
7 shortly. I thought it might be helpful just to indicate
8 on whom we will call once I've concluded my questioning.
9 We propose first of all to invite Mr Horwell on
10 behalf of Greater Manchester Police to ask his
11 questions, followed by Mr Smith, on behalf of
12 North West Fire Control. Then the questions on behalf
13 of the Greater Manchester Combined Authority, then
14 questions on behalf of the bereaved families, and
15 Mr Weatherby is taking the lead, and then finally,
16 subject to any questions that we ultimately have,
17 Mr Davies, who represents the witness.
18 So, sir, just to remind you, we were at page 48
19 in the transcript at the very top. The time, it's
20 a counter time, 125:58, and once you're there and
21 Mr Lopez has that on the screen, we can recommence the
22 recording.
23 (9.35 am)
24 (Audio recording played to the inquiry)
25 (9.41 am)

1

1 MR GREANEY: We can stop the recording.
2 So that was right at the end, you having
3 a conversation with Superintendent Thompson, and at
4 a time that we know is in fact 00.18, you time it as
5 quarter past, and Superintendent Thompson takes over the
6 role and responsibilities of tactical firearms commander
7 from you.
8 A. That's correct, yes.
9 Q. As I indicated yesterday, I'm going in a moment to ask
10 you questions about that period of time, but first of
11 all there are two matters that I know you want to
12 address.
13 First of all, yesterday, an aspect of your account
14 emerged for the first time, at least so far as your
15 statements are concerned, namely that there came a point
16 in time at which you recognised the desirability of
17 a second FDO and as a result you sent out a WhatsApp
18 message to the other FDOs within Greater Manchester, but
19 none was available immediately to help you.
20 A. Yes.
21 Q. At our request, so the inquiry legal team's request,
22 overnight or this morning, Mr Davies who represents you
23 has spoken to you to ask you to make an enquiry to see
24 if you can ascertain the timing of that message; is that
25 correct?

2

1 A. Yes.
2 Q. First, I believe you want to make clear that the
3 WhatsApp group, which involved you and your FDO
4 colleagues, was an informal WhatsApp group?
5 A. Yes.
6 Q. And that generally, it was dedicated not to work issues
7 but to social issues?
8 A. Yes.
9 Q. Have you made an attempt to see if you can identify the
10 timing of the message that we are most concerned about?
11 A. I have.
12 Q. With what outcome?
13 A. I'm unable to. I believe that the WhatsApp group was
14 stopped a number of years ago and the messages
15 thereafter will have gone.
16 Q. So in the result you haven't been able to ascertain the
17 time of the message?
18 A. No.
19 Q. It would seem therefore we can't take that particular
20 issue any further forward than we took it yesterday?
21 A. No.
22 Q. Secondly, Mr Davies was good enough to say to me that at
23 the end of his entirely proper conversation with you,
24 you indicated to him that there was something about your
25 evidence yesterday that you wished to correct. He

3

1 rightly invited you to stop and to tell me and the
2 chairman what it is you want to correct. So this is
3 your opportunity to do so.
4 A. Yesterday, you asked me -- I think it passed as quite
5 a minor point, but I think it's quite a key point,
6 what was the firearms authority. My response to that
7 was more along the lines of an explanation of the
8 administrative side of a firearms authority rather than
9 what the firearms authority is, and I think it is very
10 crucial and a key piece of information.
11 GMP or firearms officers in this country -- officers
12 in this country are not routinely armed other than the
13 firearms officers, but although firearms officers have
14 immediate access to firearms, they don't have the
15 authority to just deploy themselves to firearms
16 incidents unless they come upon one without any kind of
17 notification and there's an immediate threat to them or
18 others and then they can self-deploy.
19 If they're not self-deploying, which is very rare,
20 then it has to go through a command structure, so for
21 them to utilise a potential lethal weapon in the public,
22 it has to go through a command structure, as I've said,
23 which is through the ITFC or the TFC, ITFC if it's
24 spontaneous and TFC for planned. That means that the
25 TFC will look at all the information that's available,

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1 run through the NDM, as I have already said, have
 2 a discussion with the tactical adviser about what
 3 tactics are best utilised under the circumstance we are
 4 dealing with, and then that authority is conveyed to the
 5 firearms teams and that then sets up the structure of
 6 an OFC, et cetera.
 7 I just wanted to make clear that just because we
 8 have firearms officers on the ground doesn't mean they
 9 can always utilise their firearms unless they've got
 10 that authority.
 11 SIR JOHN SAUNDERS: Thank you. And the deployment and the
 12 authority are two different things? So you could send
 13 them to the arena without giving them the authority?
 14 A. Very much so. As a deployment --
 15 SIR JOHN SAUNDERS: Actually, that's what you did in this
 16 case?
 17 A. Initially, yes, because we can deploy firearms officers
 18 to routine jobs, just because they've been deployed,
 19 they're being deployed almost as an unarmed resource
 20 rather than an armed resource, they just happen to be
 21 carrying firearms. If the firearm is needed, that's
 22 where the firearms authority comes into place, so
 23 I apologise if I confused matters.
 24 SIR JOHN SAUNDERS: No, no, I don't think I was misled in
 25 any way and I'm grateful for that, thank you.

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1 MR GREANEY: Sir, you are quite correct: armed officers were
 2 deployed to the scene no later than 10.36 and firearms
 3 authority was granted as 10.40, which was just as the
 4 ARVs, the first ARVs, were arriving at the scene.
 5 Chief inspector, we have now listened to the
 6 recording, which I hope all will regard as having been
 7 valuable. I'm going to ask you questions about the
 8 period that we've just listened to, so 10.46 up until
 9 about 00.15, and indeed about the subsequent period
 10 because your recording ends at shortly after 1.30 in the
 11 morning of the 23rd.
 12 I'm going to deal with matters in topics, but also
 13 chronologically so far as that is possible, and it won't
 14 always be possible, I warn you.
 15 Obviously, as you'll appreciate, I'm not going to
 16 deal with every single entry in the very substantial
 17 schedule that we have and so it's important that
 18 I should make two things clear at the outset.
 19 (1), as all listening carefully will have realised,
 20 you do on a number of occasions make clear that over
 21 a period of time you were concerned about a secondary
 22 device and/or a secondary attack. So let's be clear:
 23 there is contemporaneous evidence that those thoughts
 24 were in your head at the time.
 25 And (2), from 11.16 pm, the situation that you were

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1 dealing with became more complicated, perhaps even
 2 confused, because you were from that point faced with
 3 a report, or even reports, of another suspicious
 4 character or characters that needed to be dealt with.
 5 So there's the person that's spoken about near the
 6 cathedral, there's a thought that someone is going to
 7 Piccadilly, and you were also confronted with
 8 a discarded jacket near to the cathedral which was
 9 thought to be on top of something and therefore to be
 10 suspicious.
 11 So those were matters that complicated the situation
 12 you were dealing with; is that correct?
 13 SIR JOHN SAUNDERS: And a person in an Audi car?
 14 MR GREANEY: And the person in an Audi, car.
 15 A. Yes, sir.
 16 Q. Although that was quite short-lived, I think, was it
 17 not?
 18 A. Yes.
 19 Q. Let's get to the topics that I wanted to deal with.
 20 First of all, the declaration of Operation Plato.
 21 We've been over some of this ground but I just want to
 22 be as clear as we can about it.
 23 Could we have the first page of the transcript?
 24 This is {INQ024325/1}. We're at the very bottom of that
 25 page, please, where at 22.47 hours, just passing into

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1 22.48. I'll read out what you said:
 2 "Yeah, in view of that obviously my first call was
 3 for Op Plato, that's what we've got, declaring Op Plato
 4 in relation to a report that we now have confirmation of
 5 a male who would appear to have strapped a device to his
 6 body and detonated it inside the arena causing multiple
 7 victims and injuries."
 8 Then you said:
 9 "Update when you're (background noise) able to get
 10 inside to give me any fatalities, et cetera. But
 11 obviously we're not -- we expect that there's anyone
 12 else involved. At this moment in time I can't negate
 13 that it was a lone actor on this one."
 14 I think we'll be able to agree about this: first of
 15 all, there is no reference in what was in effect your
 16 declaration of Operation Plato to an active shooter?
 17 A. Other than a lone actor, no, you're right, no
 18 suggestion.
 19 SIR JOHN SAUNDERS: Can we go back to page 1?
 20 MR GREANEY: Yes, certainly.
 21 SIR JOHN SAUNDERS: Just for my benefit, it may be we just
 22 don't know this, but Mr Sexton is saying:
 23 "Yeah, in view of that obviously ..."
 24 Is that a response to the message before:
 25 "Just had confirmation from a member of the public

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1 saying that an individual has detonated a device
 2 attached to his back and blown himself up inside the
 3 venue."
 4 Next on this list is:
 5 "Yeah, in view of that obviously ..."
 6 Do we --- is it obvious whether it's a response or ---
 7 A. Yes. That would have confirmed my fears with that
 8 response based on what I knew prior to that conversation
 9 as well.
 10 SIR JOHN SAUNDERS: But you are responding to what comes
 11 before?
 12 A. Yes.
 13 SIR JOHN SAUNDERS: Thank you very much.
 14 MR GREANEY: That's a very good question.
 15 We'd seen that it was building up, there had been
 16 the radio operator passing a message at 10.37 referring
 17 to Plato, it was in your thoughts at that time. Then
 18 we have, at about 10.41, I think, and a little bit
 19 later, Lee Moore, the firearms officer referring
 20 expressly in conversation with you to Operation Plato.
 21 Another firearms officer, Christopher Charlton, has then
 22 provided you with further information, and that does
 23 seem, as the chairman's identified, to be the basis for
 24 you to decide, "I'm declaring Operation Plato". Is that
 25 correct?

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1 A. Yes.
 2 Q. And it does then go on the log at 10.47. So the lone
 3 actor in what you said seems plainly to relate to the
 4 bomber himself, so I think you're agreeing that at the
 5 moment that you declare Operation Plato there is no
 6 express reference to an active shooter?
 7 A. No, there isn't. That transmission there that we've
 8 just discussed is the briefing, albeit a very brief
 9 briefing, to the firearms officer, to the OFCs on the
 10 ground. Because the officers were already there on the
 11 ground, as I think I said yesterday, APP for armed
 12 policing allows for the best briefing in the time that
 13 you've got. When you've got officers on the ground
 14 dealing with it, then you've got no time. Is that
 15 a perfect briefing? By far it's not a perfect briefing,
 16 it doesn't cover the key points.
 17 Q. I'm not going to be suggesting that you didn't have
 18 within your mind the thought that there was
 19 a possibility that there was an active shooter somewhere
 20 within the building. But what I'm going to suggest
 21 is that that, certainly when one listens to the whole of
 22 that recording, does not seem to be a thought that was
 23 at the forefront of your mind.
 24 A. Yes, it was always at the forefront of my mind. I think
 25 I mentioned it once or twice in conversations, but as

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1 I said yesterday, the mention of an active shooter would
 2 start potentially affecting the way that resources were
 3 deployed, and I did want to avoid that. I would
 4 suggest ---
 5 Q. Sorry, you did or didn't want to avoid that?
 6 A. I did want to avoid that. I think with the briefing
 7 there to firearms officers, I think it should have been
 8 expressed that there is a potential due to the report of
 9 gunshot wounds, although they were already aware of that
 10 because I think I'd already relayed that over the radio
 11 as they were going to the scene.
 12 But yes, ideally I should have mentioned that, but
 13 I didn't. But it wasn't that it wasn't a consideration,
 14 it was certainly a consideration.
 15 Q. I'm going to jump ahead just a little bit, which, as
 16 you'll realise, I do tend to do, just to understand
 17 something you've just said. You wanted, I think, you've
 18 explained, to avoid the consequences of saying that
 19 there might be an active shooter.
 20 A. Yes.
 21 Q. So do you mean by that that you wanted to or felt the
 22 need to declare Operation Plato, but you wanted to avoid
 23 the consequences on the ground of that declaration?
 24 A. Yes.
 25 Q. What then was the point of declaring Operation Plato?

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1 A. Operation Plato was important to the firearms officers,
 2 just by saying Operation Plato they would have
 3 understood what the risk was in relation to an MTFA. So
 4 it was crucial that the initial declaration to the
 5 firearms officers was made. And as I said yesterday,
 6 I knew that Op Plato --- the circumstances fitted
 7 Op Plato, but once I'd declared Op Plato it wasn't until
 8 that point that I started thinking about the
 9 implications of Plato and how that affected our response
 10 on the ground. So there was still a threat there, but
 11 obviously I've already declared Op Plato.
 12 Q. When you say "affect our response on the ground", the
 13 response on the ground ought to have been the zoning of
 14 particular areas as hot, warm and cold?
 15 A. Yes.
 16 Q. And therefore ensuring that there were not in the hot
 17 zone anyone, apart from any emergency responders at any
 18 rate, apart from armed officers there to neutralise the
 19 threat?
 20 A. That's right.
 21 Q. But you never zone that area, do you?
 22 A. No, once I start talking about zones, I knew what I was
 23 treating as a hot zone but as I --- if I start talking
 24 about zones, then --- we only talk about zones within an
 25 Op Plato deployment. That's where I would get partners,

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1 NWAS, for instance, or even unarmed staff on the ground
 2 asking, what is the true threat here, and that's where
 3 I would have had to be honest with them. You're right,
 4 I don't talk about zones, but I know that I am dealing
 5 with a hot zone.
 6 Q. I don't think the word "zone" -- it might appear once
 7 right at the end, but during the golden hour I don't
 8 think the word "zone" appears anywhere in this
 9 recording.
 10 A. No, you're most probably right.
 11 Q. So you don't say, "The City Room is a hot zone", but
 12 equally, not a single firearms officer, at least so far
 13 as is revealed in the communications with the OCR, asks
 14 what area is what zone.
 15 A. Yes.
 16 Q. Is that not a very surprising situation?
 17 A. It was a very new situation to us all dealing with it,
 18 never, ever experiencing it before. Should we have
 19 talked about zones? I certainly should have talked
 20 about zones if I'm following the letter of the law.
 21 Would I have expected armed officers on the ground to
 22 start talking about zones once they knew it was
 23 Op Plato? Then yes, and the OFC would have been the
 24 obvious person to start asking about that.
 25 I knew I was dealing with it, I didn't declare it,

1 I know why I didn't declare it. Did I wonder why
 2 I wasn't -- any of my firearms officers weren't talking
 3 about zoning? No, it really didn't cross my mind at
 4 that point.
 5 Q. You were hugely busy and anyone listening to that
 6 recording will accept that. But now when you look back
 7 it is a striking feature that the OFC and other firearms
 8 officers don't say, "Boss, where is the hot zone?"
 9 A. Yes.
 10 Q. Because after all, they need to know, if this is really
 11 a Plato situation, where the hot zone is so that they
 12 know where to go to find the active shooter so that they
 13 can take him out.
 14 A. Mm--hm. I think, as I said yesterday, the hot zone now,
 15 my understanding is very much, and the change in policy,
 16 is that actually the hot zone should be as small as
 17 possible. I can only take a reasonable assumption that
 18 the firearms officers would have been looking at the
 19 arena, as I was as, as almost a complete hot zone at
 20 that point rather than just the City Room.
 21 Q. If that is so, they ought to have had had some direction
 22 to that effect, should they not?
 23 A. Yes.
 24 Q. And in any event there are a number of ways of looking
 25 at this I'm going to suggest. One is that the reason

1 you don't mention zones and the reason no one asks you
 2 about zones is because no one at that scene really
 3 thought that this was truly an Operation Plato
 4 situation. Do you accept that that's a correct
 5 characterisation?
 6 A. No, I don't. The officers at the scene wouldn't have
 7 had all the information that was coming in to me. I was
 8 receiving reports of people with injuries consistent
 9 with gunshot wounds, and reports of people being shot or
 10 having been shot. That might not have been apparent and
 11 certainly available to the officers whilst they're
 12 dealing with the actual incident on the ground. I think
 13 the very reason that or the very fact that I declared
 14 Op Plato would have been certainly reason enough for the
 15 firearms teams to understand that I was talking about an
 16 ongoing firearms threat. But it was never verbalised,
 17 no.
 18 SIR JOHN SAUNDERS: It's actually maybe confusing. Again
 19 this is a completely artificial exercise, we do
 20 understand that, but nevertheless this is the only thing
 21 we can do to look into your mind at the time. The
 22 direction that you give them, the armed police, about
 23 going in to look for other armed terrorists, is:
 24 "But obviously we're not -- we expect that there's
 25 anyone else involved. At this moment in time I can't

1 negate that it was a lone actor on this one."
 2 And you're not going to mislead, are you, your armed
 3 officers going in as to the extent of the risk of
 4 another armed person, meaning they're going to be met by
 5 another man with a gun? You're not going to underrate
 6 the risk to them, are you?
 7 A. No, not at all, and I think I've covered that by saying
 8 I can't negate that there's a risk from another
 9 offender. If I'd said, "It's a lone actor and that's
 10 it", then why we do we have Plato in place, but the fact
 11 is with the information and intelligence coming in
 12 I couldn't negate and by the very fact I say I can't
 13 negate a second offender, that automatically puts the
 14 firearms teams on a slightly higher alert, plus the fact
 15 they've been given a high-risk tactic of an emergency
 16 search, which is only used to neutralise an ongoing
 17 threat.
 18 SIR JOHN SAUNDERS: In fairness to you, you're actually
 19 putting the "negate" other way round:
 20 "I can't negate that it was a lone actor on his
 21 own."
 22 So you're actually putting it the other way round,
 23 which makes your point more strongly, I think.
 24 A. Right, yes.
 25 MR GREANEY: I'm going to come back to another potential

1 explanation for what we see and hear in this recording,
 2 but what you seemed to me to be saying overall in that
 3 passage was that you thought it was unlikely anyone else
 4 was involved but you couldn't exclude it .
 5 A. Yes.
 6 Q. As I said , one explanation for what we see happening,
 7 you not zoning and no one asking you about zoning,
 8 is that no one thought that there was any prospect of an
 9 active shooter in that area. The other possibility is
 10 that the firearms officers on the ground didn't really
 11 understand what Plato was and what responsibilities it
 12 placed upon them.
 13 A. I really don't believe that that would be the case. As
 14 I said yesterday, within the firearms world Op Plato is
 15 very well understood, all our firearms officers are
 16 highly trained and kept up to speed with all changes in
 17 legislation , et cetera. So I would find it difficult to
 18 believe that they didn't know what Op Plato was and
 19 maybe that's a question that needs to be asked of the
 20 OFC, PC Richardson. I would be surprised if he wasn't
 21 aware of it .
 22 Q. Obviously, the Operation Plato plans that have been
 23 devised in the first instance by CTPHQ had been the
 24 result of a good deal of thinking by experts; is that
 25 correct?

17

1 A. Yes.
 2 Q. And attempts had been made to implement them in Greater
 3 Manchester Police. To what extent those plans were
 4 successful is obviously a question for the chairman to
 5 consider. At their heart the Operation Plato plans were
 6 the consequence of a good deal of thinking?
 7 A. Very much so yes.
 8 Q. Why did you know better than those who had decided how
 9 an Operation Plato situation was to be dealt with?
 10 A. I think as with any policy, direction, guidance,
 11 whatever, on paper it always looks good. However, no
 12 policy can cover the changing picture of an ongoing
 13 dynamic incident. If Plato was followed rigidly then
 14 a lot of these questions you're asking me we wouldn't be
 15 having, but would it have been right to do? No, it
 16 wouldn't have been right to do. Ultimately, regardless
 17 of what policy or legislation is there, the overarching
 18 responsibility as a police officer is to save lives
 19 under Article 2. That takes priority over everything.
 20 I was very much aware of that and policy, for me, is
 21 very much being able to use it as a guide rather than as
 22 a rigid structure.
 23 I think it's worth saying at this point: why did
 24 I think I could do that? In numerous inputs, certainly
 25 going back to previous Chief Constable Sir Peter Fahy,

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1 a lot of leadership inputs that we had, the opening
 2 gambit was always stressed: policy is there to help you
 3 and guide you; however, if you deviate away from policy
 4 and it's justifiable, then the force will support you.
 5 So I believe that I had the ability and the
 6 authority to move away, but regardless of that, the fact
 7 that I'm looking to save lives is what I did, is what
 8 I think I tried to achieve. You're right, in a perfect
 9 world, the gold standard is following policy, but
 10 actually policy doesn't always fit in with reality, as
 11 can be seen from the night of the 22nd. In a very
 12 dynamic changing picture, it is impossible to follow
 13 rigid guidelines, but yes, I agree, if it was possible
 14 then it is the gold standard.
 15 SIR JOHN SAUNDERS: Just before we go on, I don't think this
 16 is a matter where guidance can't help because I think it
 17 can. You said to Mr Greaney:
 18 "I thought it was unlikely that anyone else was
 19 involved at the time I sent the officers in but
 20 I couldn't exclude it."
 21 So the question arises: should Operation Plato apply
 22 until you are satisfied that there is no one else
 23 involved or should Operation Plato only apply when
 24 you are satisfied that someone else is involved? Do you
 25 see the distinction?

19

1 A. Very much so, sir. My own observation on it is that
 2 it is much easier, and the new guidance allows this to
 3 happen, to declare Plato, get the ball rolling with it
 4 because of all of implications that it carries. But
 5 then, as the information changes, and if it is deemed
 6 that actually it's not what it initially seemed, it is
 7 easy to scale down then. I don't believe the original
 8 policy allowed that to happen, but I would always say
 9 that if you think there is a possibility of an active
 10 shooter, the amount of fatalities that they could cause
 11 in a very, very short period of time is significant, and
 12 therefore erring on the side of caution, I think is
 13 a better approach.
 14 SIR JOHN SAUNDERS: Okay, but the corollary of that actually
 15 must be, mustn't it, you stop it as soon as you possibly
 16 can?
 17 A. Yes, sir .
 18 MR GREANEY: And also perhaps in a sense this takes us back
 19 to a place we were yesterday, that really what was
 20 needed was not something that was overly prescriptive
 21 but something which did give a degree of discretion to
 22 the commanders to say to what extent is there a risk of
 23 an active shooter and to what extent is there a need to
 24 have emergency services in that area treating people who
 25 are badly injured?

20

1 A. Very much so and that's what the new policy now allows.
 2 Q. Having asked you at the beginning of this sequence of
 3 questions a very direct question, in light of your
 4 answer I think it is only fair to recognise that the
 5 practical consequence of the decision that you made that
 6 night, if it was a decision, was that at least some
 7 people who are likely to have been removed from that
 8 area, such as Paddy Ennis, Lea Vaughan, and
 9 Mr Hargreaves, remained when otherwise they would have
 10 been removed.
 11 A. I can't say that. If I had followed policy, then
 12 certainly people would not have been removed from that
 13 location. The fact that I didn't follow policy meant
 14 that treatment was continued and injured victims were
 15 able to be removed from the location.
 16 SIR JOHN SAUNDERS: It's a comment, really, but the reality
 17 is, I may conclude, that not enough paramedics went in
 18 and there seemed to be a limbo state going on there
 19 rather than, once someone had gone through and said,
 20 "There are no gunmen here", then everyone would have
 21 known they could have got enough paramedics in there to
 22 do the job and get people out. That's the corollary of
 23 it.
 24 MR GREANEY: I'm coming to that, sir.
 25 SIR JOHN SAUNDERS: So sorry.

21

1 MR GREANEY: Not at all.
 2 I'm sure you have understood the point
 3 the chairman's made.
 4 A. Yes.
 5 Q. On the one hand it might be thought that what you did or
 6 didn't do enabled a small number of paramedics to remain
 7 in there. On the other hand, the question arises of why
 8 more didn't go in, and I am going to get to that, as I
 9 said.
 10 A. Yes.
 11 Q. Where I was seeking to go before I diverted myself was
 12 the question of whether Plato should ever have been
 13 declared in the first place and, even if it should have
 14 been, or it was a decision within a reasonable range,
 15 whether it should have been cancelled or withdrawn much
 16 earlier than in fact happened, which took a long time.
 17 This takes us back to where we were, namely what you
 18 said right at the outset at the time of declaration.
 19 One of the things you said just before 22.48 was:
 20 "Update when you're able to get inside to give me
 21 any fatalities, et cetera."
 22 So it would seem, and tell me if I've got this
 23 wrong, that you intended that officers should get inside
 24 somewhere; is that right?
 25 A. Yes.

22

1 Q. And was the somewhere that you expected them to get
 2 inside the City Room?
 3 A. Yes.
 4 Q. To whom was that instruction or request directed?
 5 A. That was over the national firearms channel, so it was
 6 to my firearms officers.
 7 Q. So you expected, at 22.47, firearms officers to go into
 8 that area and then to update you?
 9 A. Yes.
 10 Q. And really, this takes us back, doesn't it, to what you
 11 said yesterday, that the OFC, Mr Richardson, was your
 12 eyes and ears on the ground?
 13 A. Yes.
 14 Q. He was how you were going to get situational awareness?
 15 A. Yes.
 16 Q. He was how you were going to discover whether the
 17 maintenance of Operation Plato was appropriate?
 18 A. Yes, but not in the entirety. He is one person. I'm
 19 still looking at all the information that's coming in on
 20 the FWIN and listening to the radio chatter, but yes, he
 21 certainly is my eyes and ears.
 22 Q. He's critical, isn't he?
 23 A. Yes.
 24 Q. He's the OFC, he's the one with responsibility for the
 25 firearms officers there, he's the one who's going know

23

1 if there's an active shooter in that area?
 2 A. Yes.
 3 Q. So we need to understand then what was happening with
 4 the firearms officers over this period and we did look
 5 at some of this yesterday but I want to put it together
 6 against the background of the discussion that we've just
 7 had.
 8 First of all, the period before your declaration.
 9 Mr Lopez, could we have, please -- and don't put this on
 10 the screen until I give you the page number --
 11 {INQ035612/67}.
 12 22.41.27, so 6 minutes before your declaration.
 13 This, I think, is the first armed response vehicle that
 14 we see, just outside the railway station. So fix that
 15 time in your mind.
 16 Next, please, {INQ035612/69}, 22.41.52. A second
 17 armed response vehicle has arrived in the area.
 18 Next, please, {INQ035612/75}. It's now 22.42.44.
 19 Two of the armed officers from one of those vehicles
 20 have entered the arena via the lower Trinity Way exit
 21 doors and they are heading towards the City Room. Okay?
 22 A. Mm-hm.
 23 Q. Essentially, they're doing exactly what you would have
 24 expected them to do?
 25 A. Yes.

24

1 Q. And indeed, what you instructed should be done at 22.47.
 2 {INQ035612/78}, please, 22.42.52. We can see two
 3 further GMP firearms officers and they are entering the
 4 station via another entrance. So in other words, via
 5 Station Approach.
 6 A. Yes.
 7 Q. So you've got officers coming from one side towards the
 8 City Room and from the other side towards the City Room.
 9 You're nodding your head in agreement with me.
 10 A. Yes.
 11 Q. Then at {INQ035612/79}, at 22.42.56, we can see those
 12 same two officers are running up the stairs, heading
 13 towards the City Room.
 14 So we're just under 12 minutes after the explosion
 15 and we have firearms officers about to enter the
 16 City Room from both sides, do you agree?
 17 A. Yes.
 18 Q. {INQ035612/82}, next, please. Let's remind ourselves
 19 that this is a full 4 minutes before you have declared
 20 Operation Plato. It's 22.43.21. Two further armed
 21 officers are approaching the City Room from the same
 22 direction as the first two officers that we looked at,
 23 so via the lower Trinity Way exit.
 24 A. Yes.
 25 Q. One of these officers is PC Edward Richardson --

25

1 A. Yes.
 2 Q. -- the OFC, and therefore your eyes and ears?
 3 A. Yes.
 4 Q. So by that stage, 4 minutes before the declaration, he's
 5 in the building and approaching the City Room.
 6 Next, please, {INQ035612/84}, 22.43.32. We see two
 7 of the other officers that we saw earlier, getting yet
 8 nearer to the City Room.
 9 INQ035612/85, please, 22.43.35. The officers who
 10 have entered via the war memorial entrance and run up
 11 the stairs to the overbridge are really very near, by
 12 that stage, to the City Room.
 13 {INQ035612/87}, 22.44.06. Nearer still.
 14 {INQ035612/91}, 22.44.37. Two GMP firearms officers
 15 enter the City Room from the station and they've exited
 16 the City Room. This is all before your declaration.
 17 Next, {INQ035612/101}, please, 22.46.04. Four
 18 firearms officers, including the OFC, running towards
 19 the City Room.
 20 Then {INQ035612/103}, 22.46.24. We have six
 21 firearms officers, a minute and a half before your
 22 declaration, outside the City Room, and at least two of
 23 those officers have by that stage been through the
 24 City Room and the OFC is about to go in.
 25 Have you followed all of this so far?

26

1 A. Yes.
 2 Q. So we have a substantial contingent of firearms officers
 3 there a minute before your declaration. Two have
 4 actually been into the City Room and your eyes and ears
 5 is about to go in; okay?
 6 Before I put up the next image, could I warn people
 7 that this is an image from within the City Room.
 8 Obviously, it is post-explosion. It has been edited so
 9 as to remove any image of any person dead or injured,
 10 but nonetheless I warn people that I am going to display
 11 this image on the screen because it's an important one.
 12 The image that we are going to see next is timed at
 13 22.48.06, and so this is almost certainly during that
 14 passage of conversation that we looked at a short time
 15 ago during the course of which you declare
 16 Operation Plato.
 17 Mr Lopez, could we have on the screen, please,
 18 {INQ035612/114}? GMP Inspector Michael Smith,
 19 Bronze commander, has a brief conversation with
 20 Sergeant McGowan and two GMP firearms officers inside
 21 the City Room.
 22 Many other firearms officers arrive in the minutes
 23 that follow. Twenty minutes nearly have passed since
 24 the original explosion and I would like you to accept
 25 that the area that we are looking at in that photograph

27

1 is not an area in which there is any threat of an active
 2 shooter.
 3 A. I think with the benefit of the CCTV, yes. However,
 4 I didn't have the benefit of CCTV. I was not aware,
 5 other than updates I received over the radio, of who had
 6 been through the City Room. So my situational awareness
 7 was obviously not as good as it is when we've had
 8 a chance to look back with hindsight. However, as
 9 I said yesterday, I didn't know what the picture was,
 10 the full picture was, inside the City Room. So again,
 11 I couldn't negate any risk from a potential active
 12 shooter there or within the arena area.
 13 Q. Can I invite you to consider whether hindsight has
 14 nothing to do with this? Because your OFC was there and
 15 able to provide you with the information that there was
 16 no such threat in that room or he was there for you to
 17 ask him the question.
 18 A. I wasn't aware that he'd actually entered the room
 19 fully. In an ideal world, a much more detailed update
 20 or question from me as to what I required is obviously
 21 more beneficial, and likewise a full update from him
 22 from the scene would have been more beneficial. Despite
 23 what he would have told me, would I have still been
 24 satisfied that there was an ongoing threat there with
 25 the information that coming in from other sources that

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1 he wouldn't aware of it? Then no, I don't believe that
 2 I would hand on heart have said I didn't think that
 3 there was a potential risk still in that location.
 4 SIR JOHN SAUNDERS: So you wouldn't remove, on the basis of
 5 what you see in that picture, Operation Plato?
 6 A. No.
 7 SIR JOHN SAUNDERS: Would you have said that is not a hot
 8 zone?
 9 A. No, I would have still thought that that was a hot zone.
 10 SIR JOHN SAUNDERS: So you've got injured in there to be
 11 treated?
 12 A. Yes.
 13 SIR JOHN SAUNDERS: But you would still say it's a hot zone,
 14 which technically should mean no one should be in there?
 15 A. Yes.
 16 SIR JOHN SAUNDERS: I know you weren't using it like that.
 17 A. Yes.
 18 SIR JOHN SAUNDERS: Okay. Thank you.
 19 MR GREANEY: I'm going to press you on that in a moment, but
 20 first of all I'd like to remind you of what happened
 21 almost immediately after the images that we've just
 22 seen.
 23 Could we have on the screen, please, Mr Lopez,
 24 {INQ024325/2}. This is the transcript. So it's the
 25 large block of text in the middle of the page.

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1 This is 22.48, almost straight after your
 2 declaration, and this is a radio transmission by the
 3 OFC, Eddie Richardson, so this is something you'd be
 4 able to hear, would it not?
 5 A. Yes.
 6 Q. He states:
 7 "At the moment we've got a large number of
 8 casualties inside the entrance to the arena. Some are
 9 not in a good way. We've got paramedics and people
 10 administering first aid."
 11 So from that, do you agree, it would be clear to you
 12 that either he had been into the room or he had received
 13 information direct from someone who'd been into the
 14 room?
 15 A. Yes.
 16 Q. "We've got to consider also a secondary device."
 17 And I have no doubt that's correct, my comment:
 18 "We've got no one else coming forward in relation to
 19 anyone else who's been involved in this, but we need to
 20 start getting the public out the way from the front.
 21 We've got 3 ARVs inside at the moment, two are armed
 22 contingency, and we've got a number of paramedics who
 23 are administering first aid."
 24 He had been into the City Room, he was not reporting
 25 any risk of an active shooter, he was making plain that

30

1 there was no one else coming forward in relation to
 2 anyone else that's been involved in this. Again, could
 3 I invite you to accept that this was not a Plato
 4 situation and, even if it was, the City Room was not
 5 a hot zone?
 6 A. I still disagree that it wasn't a Plato situation. He,
 7 as I said earlier, was not fully aware of the
 8 information that was coming in to me in relation to the
 9 ongoing threats and the additional reports of gunshot
 10 wounds. I should possibly have relayed that over the
 11 air to him, yes. But did I still think that there was
 12 a threat there because what he was dealing with was the
 13 aftermath of what appeared to be or what was an
 14 explosion, but I was receiving reports of potential
 15 gunshot wounds as well, so was this still a Plato for
 16 me? It most definitely was a Plato still at that point.
 17 Q. Was this a hot zone?
 18 A. And I was treating it as a hot zone. The picture I had
 19 formed in my own mind based on what was coming through
 20 the radio transmissions, what was being updated on the
 21 FWINS, quite clearly for me it still had a risk to it,
 22 that area.
 23 SIR JOHN SAUNDERS: In fact, any area had a risk, didn't it?
 24 Anywhere that a gunman could have run to from the arena,
 25 the risk could be on the street outside?

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1 A. Yes. And as I said earlier, for me the risk could have
 2 remained still within the hot zone and/or within the
 3 arena itself. Does the Op Plato policy now make it
 4 a lot more clear about how to manage a hot zone?
 5 I think it does. But at that time, with what I knew or
 6 what I believed was happening, then there was still an
 7 ongoing risk. So as I said, Op Plato still stands.
 8 Should I have removed people from that area? Yes,
 9 I should have, as in people providing aftercare.
 10 I wasn't going to do that, obviously for the reasons
 11 I have already said. But for me, there was still an
 12 ongoing threat within the City Room.
 13 SIR JOHN SAUNDERS: I'll hand back to you in just one
 14 moment.
 15 Suppose Richardson had said to you, "We're here
 16 in the City Room, but it's so convoluted it's going to
 17 take us a while to actually look round the area and make
 18 sure there's no gunman there, so we will get back to you
 19 as soon as we have done that", would you then have said,
 20 "Until you've done that, you need to get everybody out
 21 of there"?
 22 A. No, I wouldn't have. I think he would have made clear
 23 that he understood that to be a hot zone if he'd said
 24 that, and I know we're talking hypothetically here, but
 25 very much so because we didn't have a definitive suspect

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1 that we were looking at and threat by an individual
 2 there within the room, then, no, I wouldn't have
 3 removed — I would have still taken the same course of
 4 action. If we had identified that there was actually
 5 a gunman within the room then automatically all the
 6 personnel who were providing treatment would have been
 7 removed from that room. But that is based on a 100%
 8 acknowledgement that there was someone there.
 9 SIR JOHN SAUNDERS: Okay. I'll leave it now to Mr Greaney,
 10 but can I just ask you this, before I do that: there's
 11 a phrase in what Mr Richardson that I don't fully
 12 understand, so if you could tell me what you understand
 13 by it. It's:
 14 "We got to also consider a secondary device."
 15 I understand that:
 16 "We've got no one else coming forward in relation to
 17 anyone else that — who's been involved with this."
 18 Can you say what you understood that to mean at the
 19 time?
 20 A. At that point I think he was relaying to me that, as far
 21 as he was concerned, no one was coming forward to say
 22 that there were other people involved in this attack.
 23 SIR JOHN SAUNDERS: Thank you, that makes sense.
 24 MR GREANEY: I'm going to come to the JOPs definitions of
 25 hot, warm and cold zone with you a little later on. But

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1 what I'm going to suggest for the moment for your
 2 consideration is that strict definitions and differences
 3 don't really matter in this situation. What you had
 4 here was a situation in which firearms officers had
 5 approached the City Room from one side and from the
 6 other side, they had gone inside, and here we have
 7 a couple of firearms officers standing around with the
 8 unarmed Bronze commander. And whilst of course there
 9 may have been a risk of a gunman somewhere, you had to
 10 consider whether that risk was real and, if real,
 11 sufficient to justify a decision that, if properly
 12 applied, would have meant paramedics leaving and none
 13 coming in. And the reality, when you look at that
 14 photograph, when you look at what had happened, what
 15 I invite you to accept is that there was no good reason
 16 to prevent paramedics and fire officers from flooding
 17 into that room.
 18 A. Again, I can see exactly how it would appear. I would
 19 say looking at those pictures, with the way that
 20 obviously those officers are standing around and
 21 obviously bearing in mind that I wasn't aware of that —
 22 SIR JOHN SAUNDERS: "Standing around" is an unfair phrase,
 23 actually.
 24 A. Yes.
 25 SIR JOHN SAUNDERS: I was going to say that at the end of

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1 the question because they are standing there, but the
 2 suggestion they're sort of standing around having
 3 a quiet chat, which is conveyed by the question that
 4 way, I think is not real.
 5 MR GREANEY: They are standing around.
 6 SIR JOHN SAUNDERS: They're in a moment of time, they are
 7 caught standing there. It could be a second before they
 8 rush off somewhere else. "Standing around" indicates
 9 leisurely activity.
 10 MR GREANEY: They have a discussion, sir.
 11 SIR JOHN SAUNDERS: I'm sure they do, but "standing around"?
 12 MR GREANEY: I'll strip away "standing around".
 13 A. I think "standing around" has negative connotations and
 14 I am sure that anything they were doing was not
 15 negative.
 16 Q. I didn't intend to suggest it was, in fact, so it's that
 17 what I conveyed, I'm sorry about that.
 18 A. Absolutely.
 19 Q. But you get what I mean, it might be thought they are
 20 not personally concerned about the possibility of being
 21 shot any moment?
 22 A. Yes, looking at that CCTV then there was no indication
 23 from those officers that they were concerned about any
 24 ongoing threat within that room.
 25 Q. That's a fair way of putting it, thank you.

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1 A. However, I was not aware that that was the case.
 2 Q. You should have been aware, shouldn't you?
 3 A. I should have been updated potentially more fully, more
 4 accurately. Again, would I have taken one officer's
 5 assessment of that area, although it's my OFC, as a full
 6 basis to change my whole approach, bearing in mind the
 7 information that I was aware of that he may not have
 8 been aware of, then no, it was still my decision whether
 9 or not Op Plato stood and whether or not that was being
 10 treated as a potential risk area or hot zone.
 11 So I can say exactly where, looking back at it,
 12 where we could agree that it would appear that there's
 13 no risk there, but that's not certainly the picture
 14 I formed in my mind.
 15 Q. I'm going to press you for a moment more and then
 16 I promise I'll move on to a different, although
 17 connected, topic.
 18 If you'd been told by the OFC, this time just
 19 a minute after the declaration had been made, "We've got
 20 a significant number of firearms officers here, they've
 21 approached the City Room from both sides, I'm in the
 22 City Room now with the Bronze commander, there is no
 23 active shooter to be seen, no one has suggested that
 24 anyone else was involved", if you had been told that,
 25 what else did you know that would have meant that it was

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1 appropriate to keep that a hot zone?
 2 A. The reports of more than one person being involved,
 3 injuries consistent with gunshot wounds. I think it
 4 would have been part, and a significant part, of my
 5 assessment. If I'd been given a much more clear picture
 6 of inside, and that could have either been through
 7 PC Richardson obviously delivering that himself or
 8 equally I should have potentially asked more pertinent
 9 questions, then that may have changed how I assessed the
 10 City Room at that point.
 11 Q. The definition in JOPs, which we can go to if necessary,
 12 of a hot zone is as follows:
 13 "Where attackers are present and/or there is an
 14 immediate threat to life."
 15 The definition of a warm zone is:
 16 "Where the attacker is believed to have passed
 17 through but could enter/re-enter imminently. These
 18 areas cannot be guaranteed safe."
 19 Now that we have looked at all of this and seen what
 20 you knew or should have known, on what objective basis
 21 was it appropriate to continue to deem the City Room
 22 a hot zone as opposed to a warm zone?
 23 A. As the hot zone says, either an active shooter present
 24 and/or a threat to life. It was threat to life. That's
 25 how I saw it: a potential imminent threat to life. If

1 I've assessed it wrong, and with hindsight, yes, it was
 2 assessed — now, with what we know, potentially it could
 3 have been assessed differently, but what I knew at the
 4 time, that's how I assessed it. So I believe that the
 5 rationale I used was sufficient to justify a hot zone.
 6 SIR JOHN SAUNDERS: You read out, I think "immediate" and
 7 then when reading it back said "imminent". There can be
 8 a distinction I think. Which is actually in JOPs?
 9 MR GREANEY: We can bring JOPs up, sir. I hope it's
 10 {INQ008372/4}.
 11 SIR JOHN SAUNDERS: I may have misheard.
 12 MR GREANEY: I'm sure you didn't, sir. It will be my fault.
 13 There is the hot zone:
 14 "Where attackers are present and/or there is an
 15 immediate threat to life."
 16 So we can agree, I think, that attackers weren't
 17 present, were they?
 18 A. No.
 19 Q. And there was no basis for you to think attackers were
 20 present bearing in mind what Eddie Richardson said to
 21 you?
 22 A. I think there was a basis still. There was still a risk
 23 there. In the cold light of day, it's easy to make
 24 a decision and say that there was no risk there. Well,
 25 you know, potentially there was still a risk. My

1 understanding of the hot zone, I wouldn't have known the
 2 difference between a threat to life or an immediate
 3 threat to life. That wouldn't have been my
 4 understanding. I would have understood that it's
 5 a threat to life within that area and that's what
 6 I based it on.
 7 Yes, there it is, immediate, which potentially might
 8 change the approach, but I just considered it as
 9 a threat to life for the hot zone. But I couldn't ...
 10 I can only give you how I assessed it on the night and
 11 my understanding was that there was still a threat
 12 in that area.
 13 Q. I do understand that and, can I be plain, if my
 14 questions have appeared critical, underpinning it all is
 15 an acceptance that you were doing your best on the night
 16 and you were genuinely seeking to preserve life. But
 17 I do just want to press you for one moment longer.
 18 On the basis of what you should have known, having
 19 regard to those officers in that room plainly not
 20 perceiving any threat to themselves, do you accept that
 21 it would not be appropriate to conclude that attackers
 22 were present in that room?
 23 A. No, I think you're right there. With a more clear
 24 update from the scene it would have been more difficult
 25 for me to assume that there was still a definite active

1 shooter because there was never at any point a definite
 2 active shooter within that room. However, as I said, my
 3 assessment was that there was still a threat within that
 4 room. Whether it was someone who could have been just
 5 the other side of the doors or coming back from the
 6 arena, due to the amount of people that were still
 7 in the arena, but yes, I accept that with what we know
 8 now there wasn't that immediate threat.
 9 Q. Not just what we know now but what you should have known
 10 at the time: there wasn't an attacker actually in the
 11 room and there wasn't an immediate threat to life, was
 12 there?
 13 A. I think again the gold standard for managing any type of
 14 incident that carries an ongoing risk is for the best
 15 updates and best briefings that can possibly be given.
 16 Unfortunately, for everyone involved on the night, this
 17 was the first time that anyone had dealt with, within
 18 GMP, an Op Plato. Would our understanding of Op Plato
 19 been 100%? Absolutely not. Is it easy to give clear
 20 and concise updates from the scene that those officers
 21 would have seen and had to deal with? No. Should
 22 I have been given it? Ideally, yes. Would that have
 23 changed my approach? Potentially, yes.
 24 Q. I'm just going to move on.
 25 SIR JOHN SAUNDERS: Just before you do, I'm really sorry.

1 There is a factor which maybe shouldn't be factored in,
 2 but Mr Richardson was actually saying to you, "We've
 3 still got the question of a secondary device". Now, as
 4 I understand it, the risk of a secondary device is not
 5 of itself a reason for declaring Operation Plato.
 6 A. No, it's not.
 7 SIR JOHN SAUNDERS: But if you declare Operation Plato
 8 because of the belief that you've got a gunman in there,
 9 you're then satisfied there's no gunman but you're still
 10 worried about a secondary device, then the question may
 11 arise: what's the position then?
 12 MR GREANEY: I think we agreed yesterday the position then
 13 is that the rigid rules associated with a hot zone in
 14 Plato don't apply and it's then for the commanders as
 15 part of a JESIP discussion to balance on one hand the
 16 risk to their staff in going in against, on the other
 17 hand, the risk to those who are in that room injured and
 18 in need of help.
 19 A. Yes, if we are satisfied that obviously it is not
 20 an MTFA type incident, yes.
 21 SIR JOHN SAUNDERS: Okay, thank you.
 22 MR GREANEY: I am just going to finish off this first topic
 23 I wanted to ask you about and the other topics I hope
 24 we can deal with much more quickly. This obviously was
 25 a very important one.

1 I'm going to take you to another passage in the
 2 transcript, which again records what the OFC had to say,
 3 and invite you to consider whether this piece of
 4 information should have made a difference to the
 5 maintenance of Operation Plato.
 6 This is {INQ024325/5}. If you could enlarge,
 7 please, the bottom half of that page.
 8 This is shortly before 22.54, so 7 or 8 minutes
 9 after the declaration. This is the OFC, Mr Richardson
 10 transmitting over the radio:
 11 "Yes, no change to the situation that we've got.
 12 Some area (sic) staff coming in. They're assisting --
 13 any medical assistance they can do. We've got mass
 14 casualties. It does look like it has been like a nail
 15 bomb: there's bolts, there's shrapnel everywhere inside.
 16 We believe that the male responsible is ..."
 17 And a description of where he is and his condition
 18 is given. Then this:
 19 "There is nothing to suggest anyone further but have
 20 you got any movements in relation to an explosives dog?"
 21 Take that from the screen, please.
 22 SIR JOHN SAUNDERS: I suspect it was "some arena staff"
 23 rather than "area staff".
 24 MR GREANEY: Yes, that's probably right, sir, yes. I'm sure
 25 you're right about that.

1 This would have been, I think, at about the time
 2 that, for example, Mr Billington was arriving into the
 3 room.
 4 SIR JOHN SAUNDERS: Yes.
 5 MR GREANEY: You will appreciate what I want to draw your
 6 attention to because your OFC, your eyes and ears, was
 7 saying at this stage there is nothing to suggest anyone
 8 further. Was that a piece of information which ought to
 9 have led you to conclude that it was no longer
 10 appropriate to maintain Plato or at least conclude that
 11 the City Room was not a hot zone?
 12 A. I can only take you back to my previous answers. He was
 13 giving me an update of the picture as he saw it from the
 14 City Room and yes, he is my eyes and ears on the ground,
 15 but he again wasn't aware of the information and
 16 intelligence that was coming in to me. My understanding
 17 of Plato now, with the new policy, I think, yes, there
 18 should have been clear reassessment of that area. Was
 19 I overly concerned about not declaring or
 20 re-establishing the zone? I knew that there was medical
 21 treatment being given to the casualties, I knew that
 22 paramedics were there and my understanding of the way
 23 that paramedics work with their mass casualty plans,
 24 they would be putting structures in place.
 25 I still wasn't minded to inform them of Plato.

1 I believed that there was still potentially a threat
 2 within the arena, although as time progresses, that
 3 threat obviously diminishes. Could it have been an
 4 opportunity for me to reassess the threat there? Then
 5 yes. I believe that with everything that I was dealing
 6 with, and I was satisfied that treatment was being
 7 given, that I really didn't consider it any further at
 8 that point.
 9 Q. There's just one other aspect of what was said I would
 10 like your help with -- we did touch on it yesterday --
 11 and then I'll ask the chairman whether now is the time
 12 for a break.
 13 You were being asked here, I think probably not for
 14 the first time, about an explosives dog.
 15 A. Yes.
 16 Q. It's probably obvious but worth stating nonetheless: was
 17 an explosives dog needed in order to check that there
 18 was no secondary device?
 19 A. Yes.
 20 Q. So it was quite an important step --
 21 A. Yes.
 22 Q. -- that needed to be taken? And I think you did in fact
 23 agree yesterday that there was an unacceptable delay,
 24 not at all your fault because you were certainly
 25 pressing for this to happen, before an explosives dog

1 did arrive?
 2 A. Yes.
 3 Q. Because it wasn't in fact until about 11.47 that Mojo,
 4 a BTP explosives dog, entered the City Room.
 5 A. Yes.
 6 Q. And that wasn't good enough, was it?
 7 A. No.
 8 SIR JOHN SAUNDERS: We'll have a quarter of an hour break.
 9 If we break until 11 o'clock. Is that long enough for
 10 you?
 11 A. Yes, sir.
 12 SIR JOHN SAUNDERS: Thank you very much.
 13 (10.47 am)
 14 (A short break)
 15 (11.00 am)
 16 MR GREANEY: Next topic: communication with the North West
 17 Ambulance Service. You made a reference to NWS in the
 18 recording. This is the transcript, {INQ024325/3}, at
 19 the bottom of page 3. This is just after 10.50 and
 20 another firearms officer, Lewis Adams, it's the
 21 antepenultimate entry on that page, states:
 22 "Yeah, boss. So far as I probably -- estimated
 23 we've got about 10 fatalities and probably 50 to 60
 24 wounded and being worked on. We do need a lot more
 25 trauma kits and staff, et cetera."

1 And you recognise that you've been told that there
 2 are, as it was then understood, 10 fatalities.
 3 Ian Randall says something that doesn't seem terribly
 4 relevant.
 5 You then continue at the top of {INQ024325/4}:
 6 "... and multiple injuries, serious injuries.
 7 Obviously I'll feed this back to NWS to try and get as
 8 many resources they've got as we can. Obviously you're
 9 getting 3 ARVs from the airport to come and assist and
 10 we are trying to clear the personnel from outside in
 11 case there is a secondary device or another offender."
 12 So there's one example of what I mentioned right
 13 at the outset of you expressing such a concern.
 14 It might be an obvious question, but why was it
 15 important, to use your words, to "get as many NWS
 16 resources as they've got"?
 17 A. Again, to provide that potential best treatment that
 18 they can or that could possibly be given to the victims
 19 at the scene.
 20 Q. Can you see that on the one hand it might be thought
 21 there is an inconsistency that on the one hand you're
 22 declaring Operation Plato, the purpose of which is to
 23 stop other emergency services coming to the scene,
 24 whilst, at the same time, or very shortly afterwards,
 25 minutes afterwards, saying, "I'm going to try and get as

1 many ambulance staff there as I can"? How do you square
 2 those two things in your mind?
 3 A. As I said yesterday, I was extremely conflicted with the
 4 decision I'd made around Op Plato and the
 5 non-notification to the other services. I think that is
 6 almost a throwaway comment that I've made in the heat of
 7 the moment. I knew that NWS were at the scene. They
 8 didn't need me to start pestering their control room,
 9 who would be extremely busy, I presume, to ask them for
 10 what is obviously more resources.
 11 Q. Pause for one moment because you're in fact answering
 12 what was going to be my next question, so let me ask it:
 13 in the result, did you get in touch with NWS and ask
 14 for as many resources as they had?
 15 A. No, I didn't. I think I made an attempt to contact the
 16 ILO but again, as I said yesterday, that was one of
 17 these conversations that I knew I should have, but
 18 didn't really want to have, couldn't get through at the
 19 end of the day, so that was it. But again it is not the
 20 FDO's responsibility to start directing and controlling
 21 how the other resources or how other partners will
 22 deploy their resources. They knew what they were
 23 dealing with because they had representation on the
 24 ground anyway. So I don't believe that it was necessary
 25 for me to state the obvious to them.

1 Q. Do you think it's unfortunate that you told one of your
 2 armed officers at the scene that you were going to ask
 3 NWS for as many resources as they had and then not do
 4 anything about that or anything effective about it?
 5 A. No, I don't.
 6 Q. Do you think it's unfortunate that NWS were not told by
 7 the GMP FDO that officers on the ground were saying that
 8 a lot more trauma kits and staff were needed?
 9 A. I would have presumed that, and it would have been
 10 a reasonable assumption, that they would have known the
 11 level of trauma that they were dealing with and
 12 therefore they would be arranging their own resources.
 13 Q. Is it fair to suggest that the making of that kind of
 14 assumption, which might be right or might not be right,
 15 is what JESIP is designed to avoid?
 16 A. Yes.
 17 Q. Because where you co-locate, communicate and cooperate,
 18 one doesn't have to make an assumption, one can actually
 19 have a conversation?
 20 A. Yes.
 21 Q. I'm going to come back to JESIP, as you'll perhaps
 22 expect.
 23 Next, my third topic, your knowledge about the
 24 location of the assets of the Greater Manchester Fire
 25 and Rescue Service. This requires us to look at the

1 incident log, as I've called it, FWIN as you and your
 2 colleagues describe it.
 3 Mr Lopez, this is {INQ007214/17}, please.
 4 It's bang in the middle of the page as we look at
 5 it. It's an entry timed at 22.51.44. Do you see that?
 6 It begins "From fire".
 7 A. Yes.
 8 Q. "They have a holding point of Philips Park Fire Station.
 9 There are four pumps."
 10 So at 22.51, it seems that you will have known,
 11 assuming you looked at this or were told about it, that
 12 the Fire and Rescue Service were at a "holding point at
 13 Philips Park".
 14 A. I can see it hasn't been switched through to the FDO, so
 15 it wouldn't have been a direct input that I would have
 16 been immediately aware of. Did I know at that early
 17 stage or did I read it later on? I can't say. I knew
 18 that they were going to Philips Park, but at what point
 19 I knew they were going to Philips Park I'm not sure.
 20 Q. This is the problem that we discussed between us
 21 yesterday about the incident log, that you might miss
 22 something through no fault of yours?
 23 A. Yes.
 24 Q. At some stage, you do become aware that the Fire and
 25 Rescue Service were holding, to use the language of the

1 incident log, at Philips Park?
 2 A. Yes.
 3 Q. And can you do any better than that in the sense of
 4 helping us with how long after 22.51, if it wasn't that
 5 time, you learned of that?
 6 A. I honestly can't. If it had been switched through to
 7 the FDO then it would be reasonable to suggest that
 8 I would have looked at it quite quickly. It hasn't
 9 been, so I can't give a time of when I became aware of
 10 that.
 11 Q. But at all events, you did become aware at some, as I've
 12 understood it, relevant stage that the Fire and Rescue
 13 Service was not deploying to the scene?
 14 A. Yes.
 15 Q. I think from what you've said to us, that accorded with
 16 your wishes or your intentions.
 17 A. Yes.
 18 Q. Did you know that the Fire and Rescue Service had
 19 an MTFA response?
 20 A. Yes.
 21 Q. What therefore was your reasoning for not wanting the
 22 Fire and Rescue Service at the scene of this explosion?
 23 A. What I didn't want, as I said yesterday, was more
 24 unarmed resources going into what I was dealing with or
 25 what I was treating as a hot zone. They have

1 their specialist response team who can go into warm
 2 zones, but as I said yesterday, I wasn't treating that
 3 as a warm zone, I was treating it as a hot zone, so
 4 I didn't want unarmed staff or unarmed resources to be
 5 going to the scene, which potentially would have
 6 increased the risk to unarmed staff from any potential
 7 ongoing threat.
 8 Q. Did you know where Philips Park was?
 9 A. Yes.
 10 Q. And you knew therefore it was a little distance away
 11 from the arena?
 12 A. Yes.
 13 Q. You've explained, thank you for that, why you didn't
 14 want the Fire and Rescue Service, even their MTFA
 15 response, there at the scene. I'm going to draw your
 16 attention to a passage in the transcript and ask you to
 17 consider whether that opinion that you held might be
 18 mistaken.
 19 Mr Lopez, {INQ024325/11}, the middle of the page.
 20 This is the OFC broadcasting over the radio. It's
 21 about 23.04 hours, and Mr Richardson said:
 22 "Anyone who's walking wounded to be extracted out of
 23 the venue. We've got a number of staff here who are --
 24 obviously they're not first aid trained but they're
 25 doing the best they can. If you can get anyone who can

1 to come in and basically extract anyone who can stand up
 2 and walk."
 3 Do you see that?
 4 A. Yes.
 5 Q. Do you think that the Fire and Rescue Service were
 6 perfectly placed to perform that function of extracting
 7 those people and indeed people who couldn't walk?
 8 A. Yes, they would have been.
 9 Q. So do you think, now I've drawn that to your attention,
 10 it was a mistake to regard it as not helpful to have the
 11 Fire and Rescue Service at the scene?
 12 A. I think that... Yes, that request had come in from
 13 PC Richardson. I did know that we had resources down
 14 there dealing with it, dealing with the aftermath. Was
 15 I still concerned about ongoing threats at that
 16 location? Yes, although it was starting to diminish
 17 because of the time lapse, until the next piece of
 18 information came in, which then raised the potential
 19 threat again.
 20 Q. Which piece of information are you thinking of?
 21 A. Where a second offender had been identified.
 22 Q. I understand that, so that's 11.16.
 23 A. Yes. If JESIP was in place then I believe potentially
 24 that at that point, that discussion between
 25 Silver commanders would have been made and potentially

1 the Fire Service may have gone into that area. Would
 2 I have changed it again potentially based on the
 3 information re a second offender? I don't know.
 4 I don't know is the honest answer.
 5 We're 35 minutes into the incident there, lots of
 6 information, lots of demand. Did I give it the full
 7 consideration that I potentially should have? Possibly
 8 not. But was I aware that the treatment was still being
 9 given? Again, against national guidelines and policy.
 10 And did I think that NNAS would have had sufficient
 11 resources there? I knew that we had lots of paramedics
 12 at the scene. I wasn't aware that we only had a few
 13 paramedics inside the scene. But as far as the
 14 extractions are concerned, I don't know if I would have
 15 still deployed the Fire Service. But I can see the
 16 benefit of doing that, yes.
 17 Q. Thank you. Now, topic 4 is the FDO telephone. We're
 18 getting through these topics fairly quickly. My aim is
 19 to finish my questioning as soon after midday as we can
 20 so we have as good a chance as possible of finishing
 21 your evidence today, and maybe starting Mr Randall,
 22 although that seems unlikely.
 23 This is the transcript again, but we're now at
 24 {INQ024325/7}, please. It's just below halfway down, so
 25 the bottom half of the page, please. We can see at

1 22.57, you say something about your phone, which I'll
 2 read out in a moment. But as I listen to the recording,
 3 and I've listened to it a number of times, as I told
 4 you, I thought I could hear you or someone clicking
 5 their fingers before you said this. Did you hear that
 6 or do you remember it?
 7 A. I think someone did. I think that was potentially -- it
 8 was either myself or Ian.
 9 Q. You said:
 10 "Right, I want one of you down there to come up
 11 here, please, to answer my phone for me -- someone from
 12 IMU."
 13 Was the reference to the phone a reference to the
 14 FDO phone on which, as we identified yesterday, the Fire
 15 and Rescue Service and the Ambulance Service might try
 16 to contact the FDO?
 17 A. Yes.
 18 Q. So what was happening here? What were you seeking to
 19 achieve?
 20 A. I wanted to take the pressure off me in relation to
 21 answering phone calls, which were coming through on my
 22 dedicated line, so that I could concentrate on the radio
 23 transmissions and the information that was coming
 24 through on the FWIN and potentially to continue with
 25 contacts that I needed to make.

1 Q. So this, it would seem, gives us a sense of the pressure
 2 that you were under at this time?
 3 A. Yes.
 4 Q. And is an indication of your attempts to prioritise
 5 certain aspects of your work over other aspects?
 6 A. Yes.
 7 Q. As we know, David Myerscough, who will give evidence
 8 tomorrow, or I think next week, was to assume the role
 9 of answering the telephone?
 10 A. Yes.
 11 Q. He was, as you told us, not someone that you knew?
 12 A. No.
 13 Q. And you didn't know how qualified he was for the role
 14 that he was to undertake?
 15 A. I didn't. However, again, a reasonable assumption
 16 is that if he's working with IMU and has been
 17 previously, as I believed, a radio operator, then he'd
 18 be more than capable of undertaking the tasks that
 19 I gave him.
 20 Q. If it proves to be the case that he was not suited to
 21 that role that he was given, or even not competent for
 22 it, whose responsibility would that state of affairs be
 23 in your view?
 24 A. I'm not sure who identified him to come up and be
 25 released, whether it was Ian or one of the other

1 supervisors. I find it really hard to believe that any
 2 other supervisors who would potentially have been
 3 involved would have given me someone who was not capable
 4 of doing the role, but I'm not sure who identified him
 5 to come up.
 6 Q. Did you have an opportunity to check his qualifications?
 7 A. No.
 8 Q. Would that have been quite impossible given the other
 9 tasks that you were undertaking at the time?
 10 A. Extremely impossible. I wouldn't have given it
 11 consideration.
 12 Q. Can we just look at two examples now of the performance
 13 of Mr Myerscough and can I make plain, in case he is
 14 watching, that I'm not seeking in any way to criticise
 15 him. It may prove to be the case that he was put in
 16 a position that he should never have been put in.
 17 Again, that's not directed at you, but I do want to look
 18 at two examples of his performance and seek your views.
 19 First of all, do you still have available to you the
 20 schedule that we looked at yesterday?
 21 A. Yes.
 22 Q. I don't know on which page it is going to be of your
 23 version. It's page 7 of mine. It's entry 4206. It's
 24 an entry timed at 23.04.52. It involves a conversation
 25 on the FDO line between Mr Myerscough and someone called

1 David Murtagh. Do you know who David Murtagh is?
 2 A. Yes.
 3 Q. Who is he, please?
 4 A. He's a colleague who works within the firearms wing.
 5 His role at the time was the regional coordinator for
 6 CTSFOs.
 7 Q. And Mr Murtagh wanted to speak to you and I think he was
 8 told effectively that you weren't available and
 9 Mr Murtagh said:
 10 "No problem, I've spoken to Mark Dexter and he has
 11 declared it as a Plato incident but I am on a conference
 12 with a liaison officer. I just want that to be made
 13 confirmed. Can you ask him [him being you], is he going
 14 to confirm it as a Plato incident?"
 15 And then mobilisations were going to start and
 16 Mr Myerscough said:
 17 "Yes, I'll ask him now."
 18 This was 23.04 hours, so going on for 20 minutes
 19 after you had declared Operation Plato. Does it
 20 surprise you that Mr Myerscough didn't seem to know, or
 21 at any rate have confidence, in the fact that Plato had
 22 actually been declared?
 23 A. It would all depend on whether or not that was one of
 24 the first telephone conversations he'd had. If he'd
 25 literally just sat down and received that telephone

1 conversation, he may not have known that Plato had been
 2 declared if he'd just come up from the IMU position.
 3 Q. He was in the same room.
 4 A. Yes, but that doesn't mean that everyone in that room
 5 knew it was Op Plato.
 6 SIR JOHN SAUNDERS: He'd have to know whether he was able to
 7 tell the particular person because you weren't telling
 8 everybody, were you?
 9 A. That's correct. Again, if he'd been sat with me for 5
 10 or 10 minutes, I think he would have understood that it
 11 was Plato, but if he'd just literally sat down, he may
 12 not have known at that point.
 13 MR GREANEY: You weren't keeping this secret from people
 14 in the room that Plato had been declared, were you?
 15 A. To an extent, I was. The less people that knew that it
 16 was Op Plato -- I did what was necessary. Ian Randall
 17 obviously knew about it, he updated the log on my behalf
 18 to show that. That would have meant that the radio
 19 operators potentially had seen it. As I say, after I'd
 20 declared Operation Plato, that's when I understood the
 21 implications of it, and having done that. So I was
 22 really not shouting about the fact that we were dealing
 23 with an Op Plato. And again, that is purely down to the
 24 fact that I wanted to keep it away from, to an extent,
 25 as best I could, unarmed resources and the other

1 partners as well.
 2 Q. It might be thought problematic or potentially
 3 problematic that the person who is answering the FDO
 4 telephone doesn't know Plato has been declared. And it
 5 might be thought problematic, whichever way one looks at
 6 it, because on the one hand if it's being treated as
 7 a true Plato situation, so emergency services know not
 8 to go into a hot zone, you would want the person on the
 9 FDO line to be able to communicate that to people. On
 10 the other hand, if it was being kept a secret from the
 11 other emergency services, as here, you wouldn't want
 12 a situation in which he created a situation in which
 13 people did flood into the City Room.
 14 A. Yes.
 15 Q. What I was really looking at is the performance of
 16 Mr Myerscough and it may be that that wasn't the best
 17 example. Let's look at another one and see whether this
 18 is any better. This is the transcript, {INQ024325/48}.
 19 As I said, we will come back at the appropriate
 20 point to another example of Mr Myerscough's performance,
 21 which I think is probably the best one.
 22 You can see here on this page, towards the top of
 23 it, Mr Myerscough says to you -- and this is almost
 24 quarter past midnight, so he's been in the role of
 25 answering your telephone for a considerable period of

1 time now -- he says to you:
 2 "Who is the Gold commander, sir?"
 3 And you said:
 4 "Sorry?"
 5 He asks again who's the Gold Commander and you say:
 6 "The Gold commander is ACC Ford."
 7 Is it surprising that the person who is answering
 8 the FDO telephone doesn't know at nearly 00.15 who is in
 9 Gold command?
 10 A. Yes.
 11 Q. Next topic, one I know that Mr Cooper on behalf of his
 12 families has a particular interest in -- I can assure
 13 him it was always my intention to ask about it -- which
 14 is the question of the media, which we did touch upon to
 15 some extent yesterday.
 16 It may be that we can see strain in relation to this
 17 issue starting to develop. {INQ024325/10}. It's the
 18 bottom half of the page.
 19 Can you see that you appear to say to Mr Myerscough
 20 at that stage:
 21 "Are you struggling?"
 22 Do you see that?
 23 A. Yes.
 24 Q. Should we take it from that that it became apparent to
 25 you that he was finding the situation in which he'd been

1 placed a difficult or stressful one or both?
 2 A. No, I think that refers to him -- I think that would
 3 have been an early entry -- him logging on to the
 4 computer beside me and being able to set up the
 5 telephone system to accept and answer the FDO calls. So
 6 it's more of a technical issue rather than his ability.
 7 Q. You have an actual memory of that, do you?
 8 A. No, but that's what I'm presuming.
 9 Q. He then says to you:
 10 "Boss, do you want media enquiries cancelling or
 11 do you want me to answer them?"
 12 And you replied:
 13 "No, I don't want you to speak to them at all,
 14 I want you to tell them that we're too busy, they're
 15 going to have to wait. We've just turned out the media
 16 officer who should be able to start fielding those
 17 questions. It's the FDO Jude..."
 18 I don't know what that means; do you?
 19 A. No.
 20 Q. Maybe it has been mistranscribed:
 21 "Anyone who rings up on the FDO line, answer that,
 22 and then let me know who it is and I'll decide
 23 if we need to speak to them. Okay? Like that one."
 24 So it seems that the media had been calling on the
 25 FDO line and you were giving an instruction that you

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1 didn't want to speak to them.
 2 A. Yes.
 3 Q. Was there anything that could be done to physically stop
 4 those calls from the media coming through to the FDO
 5 line?
 6 A. No. Not by me or anyone in the room.
 7 Q. So you might be able to get rid of them quite promptly
 8 when they came through, but there was nothing you could
 9 do to avoid time being, it might be said, wasted by
 10 answering the phone to see who it was?
 11 A. Yes, it's not only time wasted, it was the fact that
 12 they were -- the amount of calls that were coming
 13 through from the media were tying up the lines going
 14 through to the FDO, so it meant other crucial calls
 15 couldn't get through and they would just get an engaged
 16 tone.
 17 Q. So that is a good point, not only was the time being
 18 wasted of those in the OCR but if, for example, someone
 19 from the Fire and Rescue Service was trying to get
 20 through at the moment that a newspaper was calling, they
 21 would just get the engaged tone?
 22 A. That's correct.
 23 Q. So a double problem. Yet it would seem it was a problem
 24 that persisted throughout the whole of the period that
 25 you were the ITFC. Could you go to {INQ024325/48} of

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1 the transcript?
 2 It's the top of that page. You're talking to
 3 someone called Ben. Was he the press officer or a press
 4 officer?
 5 A. Duty press officer.
 6 Q. The time is just before 00.13, so very much towards the
 7 end of your period as tactical firearms commander:
 8 "Ben, it's Dale. I've got loads of media coming
 9 through. Have you sent anything out to tell them to
 10 stop ringing me and to give another number? Tell them
 11 they're not going to get any results from me whatsoever:
 12 they're just going to keep on getting cut off. Okay,
 13 cheers."
 14 So does it follow, now that we've seen that that was
 15 well gone midnight, that the problem that you've
 16 described persisted throughout the whole of the period
 17 that you were the initial tactical firearms commander?
 18 A. It was relentless, yes.
 19 Q. And at the risk of understatement, is a lesson that
 20 needs to be learned, not just in Manchester but
 21 throughout the country, that the FDO number is not the
 22 number that the media should be ringing?
 23 A. Not at the time of a critical or a major incident, no,
 24 that is correct. I think out of hours for a normal
 25 business--as--usual type job, then I don't see any reason

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1 why it can't be managed.
 2 SIR JOHN SAUNDERS: I'm not sure if you tell the press, with
 3 greatest respect to all of them, "Don't ring in an
 4 emergency or if it's really urgent, only ring us if it's
 5 not urgent", I'm not sure that would be -- you'd get --
 6 that wouldn't work, would it?
 7 A. No, I think it's a case of -- absolutely you're right,
 8 sir, they want the story, and understandably, but it
 9 makes the FDO's role extremely difficult.
 10 SIR JOHN SAUNDERS: This can't be the first time this has
 11 happened though.
 12 A. No, it's a regular occurrence.
 13 SIR JOHN SAUNDERS: Over many years has this been a regular
 14 occurrence?
 15 A. Ever since I've been an FDO.
 16 SIR JOHN SAUNDERS: Have you ever said or has anyone said,
 17 "This needs sorting, this is stopping us carrying on our
 18 proper business"?
 19 A. I think it is only times of major incidents that it
 20 becomes a real problem. And thankfully, they're few and
 21 far between, despite the size of GMP. So I would say
 22 the demand that the media put on the FDO is manageable
 23 95% of the time. It's the 5% which causes a problem.
 24 SIR JOHN SAUNDERS: So? It's really quite a big problem.
 25 We've just been told even the Fire Service can't get

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1 through to you, we know BTP couldn't get through to you
 2 because of all the other calls . It may only be 5% of
 3 the time, but are you still suffering it , has it been
 4 dealt with, this problem, yet?
 5 A. I'm unable to answer that question, sir. I know it was
 6 being looked at post-incident, but whether or not any
 7 technical solution has been put in place I'm unsure.
 8 SIR JOHN SAUNDERS: No doubt we'll hear.
 9 MR GREANEY: No doubt we'll hear, but although you can't be
 10 sure about that, I'm confident you'll be sure that if it
 11 hasn't been put right in Greater Manchester, it needs to
 12 be?
 13 A. Absolutely.
 14 Q. And indeed, other forces in other parts of the country
 15 need to make sure they don't have the same kind of
 16 problem?
 17 A. Yes. This would not be a unique problem to GMP. It'll
 18 be replicated through every force in the country if the
 19 FDO or the FIM is the first point of contact out of
 20 hours.
 21 Q. To what extent did it make your job and the job of your
 22 staff more difficult that night?
 23 A. As you could hear from the tape, that constant buzzing
 24 you listen to is the FDO line ringing. What happens is
 25 the structure within the FDO telephone line is there's

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1 two lines that come in, so you can be answering one call
 2 and then a second call could come in, which you can hear
 3 ringing. That is not a good working environment to be
 4 able to concentrate effectively .
 5 To enable me to make calls, outgoing calls that
 6 I want to make, I have to first cut that call off and
 7 possibly the second call that's coming in, until I've
 8 freed up my lines to then make an external call. So
 9 that can impact on the command and control of an
 10 incident, but it can be a significant problem.
 11 SIR JOHN SAUNDERS: Can I just say, we are not trying to get
 12 at the press. I'm quite sure if the press knew or
 13 thought that by ringing you they were stopping and may
 14 be delaying the rescue effort going on, they would
 15 welcome some other system being put in place so they
 16 could speak to someone who wasn't doing everything else
 17 to get the information they needed. So I'm sure they
 18 would cooperate with it as well.
 19 A. I'm certain that bearing in mind the media enquiries
 20 were not just local enquiries, there were international
 21 calls coming into the FDO from all sorts of agencies and
 22 they all come into that line. I know that, locally, the
 23 local media certainly have contact with the force, as in
 24 almost a liaison with the force, and I am aware that
 25 with some media outlets this issue has been raised and

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1 assurance was given that at times of demand, actually
 2 they would bear that in mind and only ring when it was,
 3 I suppose, acceptable to do so, or to ring a different
 4 number, because there is -- although there's the force
 5 duty officer who's the first point of contact, all media
 6 outlets do have a secondary number which goes through to
 7 the duty press officer and I don't believe that was
 8 happening. But all the local ones have access to that
 9 number.
 10 SIR JOHN SAUNDERS: So I may have oversimplified the
 11 problem, but it can't be insoluble, can it?
 12 A. No, I don't think so.
 13 SIR JOHN SAUNDERS: Okay.
 14 MR GREANEY: And needs to be solved?
 15 A. Needs to be solved.
 16 Q. I'm going to move on next to topic 6, although this does
 17 cross over with what I was asking you about right at the
 18 beginning. We've moved on now to the period between
 19 23.12 and 23.14 hours. This requires us to go to
 20 {INQ024325/15}, please, of the transcript. We'll have
 21 the top half of the page enlarged for the time being,
 22 please, Mr Lopez.
 23 This is shortly before Mr Randall is to leave the
 24 OCR to go to involve himself in setting up Silver,
 25 I think. He asks:

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1 "Right, just give me a quick overview before they
 2 answer. What's a quick overview now?"
 3 Do you see that?
 4 A. Yes.
 5 Q. "Quick overview -- at this moment in time we're setting
 6 up a Silver and we've got multiple fatalities , multiple
 7 casualties . We've put a sterile area, a cordon, we are
 8 trying to put a sterile cordon area around the MEN.
 9 I am bringing in ARVs from neighbouring forces, moving
 10 ARVs from other forces to our border area should we need
 11 to utilise them. I've declared Op Plato which is
 12 a marauding -- which is a terrorist attack. I'm just on
 13 to military assets now to update them. Everyone knows
 14 who needs to know about it, so the priority at this
 15 moment -- I am satisfied, reasonably satisfied, that it
 16 was a lone actor on this one and therefore the priority
 17 now is for the casualties ."
 18 There are two aspects of that that I want to ask you
 19 about. First of all , you have said to Mr Randall -- you
 20 said:
 21 "I've declared Operation Plato."
 22 And you went on to say you were updating another
 23 organisation and then you said:
 24 "Everyone knows who needs to know about it."
 25 What did you mean about that?

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1 A. Yes, that wasn't a specific reference to Op Plato. That
 2 was just a reference to the incident. During
 3 a significant incident, as we had, certain contacts
 4 needs to be made and the majority of those contacts, key
 5 contacts, were made, but that was in relation to the
 6 incident, not necessarily to the Op Plato.
 7 Q. So insofar as anyone reading that might have thought
 8 that you were seeking to conceal from Mr Randall the
 9 fact that some of those who perhaps ought to have known,
 10 Fire and Rescue Service and the Ambulance Service,
 11 didn't know, that would not be the correct way of
 12 reading that?
 13 A. It wouldn't, no.
 14 Q. You also said, and I just want you to hold this thought
 15 in your mind for a moment:
 16 "I'm satisfied, reasonably satisfied, that it was
 17 a lone actor on this one and therefore the priority now
 18 is for the casualties."
 19 So just hold that thought.
 20 The next minute, 23.13, you went on to have
 21 a telephone conversation with the duty sergeant. You
 22 introduced yourself and then said:
 23 "I've declared Operation Plato on a confirmed --
 24 what would appear to be a terrorist attack in one of our
 25 large arenas, multiple fatalities. Looks like

1 a body-worn explosive device with nails. I was mindful
 2 of any secondary devices or a second people involvement.
 3 We have not had that and the job has been in for about
 4 45 minutes now. So it's really a courtesy call ringing
 5 you to let you know what we've got at this moment in
 6 time."
 7 There was then what I think was probably
 8 a continuation of the same call at the very bottom of
 9 the page:
 10 "I don't know if you would be thinking of turning
 11 out on that, but at the moment the focus now is on the
 12 casualties at the scene. I think we've got the scene
 13 itself reasonably safe at this moment in time."
 14 Do you see that?
 15 A. Yes.
 16 Q. So in the course of those two conversations, you seem to
 17 be communicating a number of connected or similar
 18 things. First of all, that you are reasonably satisfied
 19 that there was just a single actor, a lone actor.
 20 Secondly, that you had been concerned, were mindful as
 21 you say, about a secondary device or a second attacker
 22 but that the job had been in for 45 minutes and that
 23 hadn't occurred. And that the scene was "reasonably
 24 safe", and in both conversations you referred to the
 25 priority being for the casualties.

1 A. Yes.
 2 Q. Was this the moment at which Plato should have been
 3 withdrawn or, at the very least, the City Room not been
 4 a hot zone in your mind?
 5 A. Potentially. That first conversation is the quick
 6 overview, bearing in mind it is when I'm on hold to the
 7 second call, the second conversation that we've just
 8 discussed. So I was literally on the phone, waiting for
 9 someone to come back to me. In view of the timing, the
 10 end of that second phone call at 23.14, yes, I think
 11 I said yesterday that the information -- and I've put in
 12 my statement that there were times when the threat for
 13 me was reducing.
 14 Q. Yes.
 15 A. And to get to the point where, actually, review it and,
 16 actually, is there a threat there, and then some new
 17 piece of information would come in. I think 23.16 is
 18 where a new piece of information came in in relation to
 19 a second offender, which basically meant: hang on,
 20 reassess all this.
 21 Q. There was never any suggestion that that second offender
 22 was anywhere within the arena complex. The nearest the
 23 information got was that he was at the cathedral and the
 24 thought seemed to have been that he was moving towards
 25 Piccadilly.

1 A. Yes. I think there was a... I can only assume that --
 2 to answer your question, yes, it would have been
 3 a reasonable point to consider the rezoning of the
 4 City Room. I think that we still hadn't had an
 5 explosives dog do a sweep of the City Room and I think
 6 that's potentially something that's been in my thoughts
 7 and decisions, that there is still the potential for
 8 a secondary device, albeit as time progresses, that risk
 9 is reducing.
 10 Q. And this goes back to something that we discussed
 11 yesterday, which is a problem or a potential problem.
 12 If your concern was no longer really an active shooter
 13 but was a secondary device, those were not Plato
 14 circumstances?
 15 A. No, they weren't, but we were in a Plato situation. The
 16 Op Plato had been declared for the right reasons and
 17 I think that at 23.16 it reinforces again that Op Plato
 18 should still be in place when we're talking about
 19 a second potential offender, who may be the
 20 outstanding -- as I saw it, the subject who's
 21 outstanding for any potential firearms discharges.
 22 Q. I'll just ask about one further aspect of this and then
 23 we'll move on.
 24 Having stated that the casualties should now be the
 25 priority, what did you do to make them the priority?

1 A. I don't believe that I did anything proactive at that
 2 point. I may have changed -- if it hadn't been for the
 3 second piece of information that came in, I may have
 4 been more proactive, but again I was aware that as far
 5 as the casualties were concerned, we did have numerous
 6 paramedics at the scene who would have been best placed
 7 or were best placed and my assumption was that they were
 8 providing that aftercare that was necessary.
 9 Q. I suppose at the risk of repeating myself, that's an
 10 assumption that may or may not be correct, and the need
 11 for an assumption is removed if there's proper joined-up
 12 JESIP thinking --
 13 A. Yes.
 14 Q. -- which, I'm going to invite you to accept at the end
 15 of my questions, didn't happen.
 16 Let's move on.
 17 SIR JOHN SAUNDERS: Before you do, this is sort of a general
 18 question just to take you away from the particular.
 19 We've heard in lots of other areas of policing what has
 20 been emphasised in training and doing things is if
 21 you're in the middle of a situation, if you're in
 22 command, you need to take a step back and be able to
 23 look at the whole situation. You never get the chance
 24 to do that as the FDO, do you?
 25 A. The role doesn't allow for that, no.

1 SIR JOHN SAUNDERS: So it might be possible -- duty Silver
 2 is not close to you in the building, really?
 3 A. No.
 4 SIR JOHN SAUNDERS: So there's no one of a senior rank there
 5 who can be looking at the overall picture with you?
 6 MR GREANEY: He's in a different building.
 7 A. He may not even be in the building, he may be en route
 8 to a location.
 9 SIR JOHN SAUNDERS: We've heard, I'm not sure whether GMP
 10 want to take lessons from BTP, that BTP actually do have
 11 someone close by who can maybe have more of an overall
 12 picture.
 13 A. Yes, GMP has learned lessons from that, sir. My current
 14 role is one of the force critical incident managers,
 15 which is that very role, which is when that major
 16 incident, major or terrorist-type incident occurs, the
 17 FCM, as we're known as, take over the command and
 18 control of that incident, releasing the FDO to carry on
 19 doing a supporting role and also to carry on with
 20 day-to-day stuff, and they're literally sat two desks
 21 away. That's how close they are in the same room. So
 22 that structure is now in place and there's been quite a
 23 bit of investment within GMP to do that.
 24 So 24/7, there are force critical incident managers
 25 on there to support the FDO.

1 SIR JOHN SAUNDERS: Yes, I have heard about that.
 2 Thank you.
 3 MR GREANEY: Moving on to topic 7, which relates to command
 4 and control. At 23.23 hours, Chief Inspector Dexter
 5 arrives at the scene. We're going to look at some
 6 images of that on the screen.
 7 Can I warn those who are watching that there will be
 8 at least one image of the City Room, but cropped in the
 9 way in which the earlier image was cropped. I'm a bit
 10 concerned this reference might not be correct. If not,
 11 I know someone will help me. We're going to look at the
 12 sequence of events that Mr de la Poer went through
 13 at the very beginning of chapter 10. INQ035612 -- and
 14 could you look to see whether 302 shows Chief Inspector
 15 Dexter? Excellent.
 16 {INQ035612/302}. As I said, 23.23:
 17 "Chief Inspector Dexter arrives at the scene and
 18 takes up the role of ground-assigned tactical firearms
 19 commander."
 20 Over the page, {INQ035612/303}, please. That isn't
 21 what I wanted.
 22 Let's go next to {INQ035612/325}, please.
 23 This is the image I wanted. It's now 23.28.
 24 Chief Inspector Dexter has made his way to the
 25 City Room, and there are going to be four images from

1 that area.
 2 {INQ035612/332}, first of all, please. We've just
 3 seen that he's on his mobile telephone in the City Room.
 4 23.29:
 5 "Chief Inspector Dexter walks across the City Room
 6 and exits on to the footbridge and seems to have
 7 a conversation with some firearms officers who are stood
 8 near the exit doors."
 9 {INQ035612/336}, please. He's in company with
 10 Eddie Richardson at 23.30.
 11 {INQ035612/337}, please. He's now walking down the
 12 stairs back into the station at 23.31. So he has been
 13 into the room, had a conversation with people just
 14 outside the room and been on his telephone.
 15 There are two points that I would like to explore
 16 with you, both short. Do you agree that what we are
 17 seeing in the images of the City Room is not a situation
 18 in which there is either an attacker present or an
 19 immediate threat to life?
 20 A. Yes.
 21 Q. Can we agree therefore that certainly at that time there
 22 was absolutely no reason for ambulance and Fire and
 23 Rescue Service staff not to be in there in numbers?
 24 A. It would appear so.
 25 Q. Point 2. Chief Inspector Dexter, as I've said, is the

1 ground—assigned tactical firearms commander. And it
 2 follows from that that he has a Silver role?
 3 A. Yes.
 4 Q. He arrived at the scene 52 minutes after the bomb had
 5 exploded and was the first Silver or tactical commander
 6 of any sort, I think, to arrive on the scene. Is it
 7 acceptable, in your view, that there was no tactical
 8 command at the scene, either for armed or unarmed
 9 officers, for that period of time?
 10 A. No, it's not acceptable. However, I would just like to
 11 qualify that.
 12 Q. Yes, of course.
 13 A. There was a command, albeit a very loose command
 14 structure, with Inspector Mike Smith, who was there as
 15 Bronze.
 16 Q. Yes.
 17 A. But you're correct, there was no dedicated Silver.
 18 Q. No. So no tactical command until 23.23. To be fair to
 19 you, you were expressing concerns about command and
 20 control around this time.
 21 Could we have, Mr Lopez, the transcript back on the
 22 screen? {INQ024325/26}.
 23 It's the very middle of the page, 23.31. You are
 24 saying — it's not immediately clear to me to whom
 25 you're saying it — you might be able to help:

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1 "I need the — I need someone in command and control
 2 unarmed staff down at the scene. Can we get the
 3 inspector for the A Division just down there until we
 4 get things sorted?"
 5 "Okay", someone says, and you then say:
 6 "I need someone to take control."
 7 This is precisely an hour after the explosion. Were
 8 you expressing there a concern that there was no command
 9 for the unarmed assets at the scene?
 10 A. I knew that we did have a Bronze at the scene in
 11 Inspector Smith. However, he would have been very much
 12 tied up with the immediate vicinity of the incident and
 13 it needed someone to take control of the outer areas of
 14 the arena.
 15 Q. Was it your view that what should have been in place
 16 at the scene was Silver commanding the firearms
 17 operation, there was then Mr Dexter, and also Silver
 18 commanding the unarmed assets?
 19 A. Yes.
 20 Q. And this really goes back to a view that you expressed
 21 yesterday, that really you would have expected
 22 Superintendent Nawaz, the duty Silver, to have been to
 23 the scene?
 24 A. Yes, but as I said yesterday, that's not the common
 25 approach that GMP has taken in the past.

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1 Q. In fact, this was a theme that continued, even after you
 2 had ceased to be the tactical firearms commander.
 3 Because if we go to {INQ024325/85} of the transcript,
 4 the time of this is 01.24, so it's nearly 3 hours after
 5 the explosion, and the block of text in the middle of
 6 the page — thank you, Mr Lopez.
 7 You had apparently been asked a question on the
 8 telephone and you said:
 9 "I don't know. I don't know to be honest.
 10 Mark Dexter is the ground TFC so I don't know who's been
 11 assigned as the non—armed command and control ground
 12 commander. Sorry about that. Yeah, yeah, with the —
 13 they're going to come into me most probably..."
 14 And you talk about suspect devices and
 15 Superintendent Thompson. So from that it seems, and
 16 you'll correct me if I'm wrong, that even at 01.30, you
 17 still didn't know who was in command of the unarmed
 18 assets at the scene.
 19 A. No, I wasn't at that time. I think I subsequently found
 20 out that we did have another inspector managing, as
 21 I understood it, or as I understand it now, the unarmed
 22 resources on the outer cordon.
 23 SIR JOHN SAUNDERS: There was an inspector there from BTP.
 24 Would it have been possible to use her?
 25 A. Yes, absolutely.

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1 MR GREANEY: Chief inspector I think you meant, sir.
 2 SIR JOHN SAUNDERS: I'm so sorry, yes.
 3 A. Absolutely. There wouldn't have been an issue.
 4 SIR JOHN SAUNDERS: It doesn't matter which force they come
 5 from?
 6 A. Yes.
 7 MR GREANEY: I mentioned Superintendent Nawaz a moment ago
 8 and, whilst we're dealing with him, let's come back to
 9 an issue that we discussed yesterday. We're going to
 10 come earlier in time therefore.
 11 At 22.50 hours you spoke directly to
 12 Superintendent Nawaz, the night—time duty Silver.
 13 A. Yes.
 14 Q. We have a transcript of this conversation, which I hope
 15 Mr Lopez can find. It's {INQ018855T/2}, please.
 16 Towards the bottom of that page, we see the first
 17 reference on it to Superintendent Nawaz.
 18 A. Yes.
 19 Q. "Dale, it's Arif. Sorry, just very quickly we've got
 20 confirmed 10 dead with multiple injuries to other people
 21 significant numbers, still trying to make sure that
 22 there's no further devices inside."
 23 "Yeah."
 24 "But obviously try and deal with it bearing in —
 25 with that in mind. We're trying to clear the members

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1 from outside — public from outside so we've got
 2 a sterile area. Need to get some more resources down
 3 there to assist with that. I'm going to have to pull in
 4 from other divisions."
 5 "Yes."
 6 Then over the page {INQ018855T/3}, please. You
 7 inform the duty Silver that:
 8 "ACC Ford is aware of it, [you] understand. I'm
 9 bringing some ARVs across from the airport and that's
 10 pretty much what we've got at the moment."
 11 "Right, okay."
 12 "So I've just printed off the evacuation plan.
 13 I take it you've got that, have you?"
 14 "Boss, I haven't had a chance to look at the
 15 evacuation plan, I'm just dealing with what we've got at
 16 the moment."
 17 And this was really the point you were making
 18 yesterday: in the situation that you were in, the idea
 19 of actually pulling out a plan was not feasible?
 20 A. Absolutely.
 21 Q. And if you were going to a plan, it probably wouldn't
 22 have been the evacuation plan anyway?
 23 A. It wouldn't have been, no.
 24 Q. Superintendent Nawaz:
 25 "Right, so it's confirmed 10 dead at the location?"

1 "Confirmed 10 dead at the location, yes."
 2 "Okay."
 3 "It looks like there's been a male — it looks like
 4 there's a male who's had a device strapped to him and
 5 exploded it."
 6 "Right."
 7 "Ball bearings, et cetera, inside. So I have
 8 declared an Op Plato, which is a terrorist attack."
 9 We've seen a number of times now that you use that
 10 term terrorist attack interchangeably with
 11 Operation Plato. I'm not going to go over the same
 12 ground again about whether it described a terrorist
 13 attack or something more specific.
 14 Then Superintendent Nawaz says:
 15 "Op what?"
 16 And you say:
 17 "Op Plato, which is a terrorist attack."
 18 And he said:
 19 "Yeah."
 20 "Okay? And obviously on the face of it at the
 21 moment we've only got one individual, a lone terrorist,
 22 but I've got to bear this in mind, that it might
 23 escalate even further."
 24 Which is the thought process you have told us about
 25 a number of times.

1 Superintendent Nawaz says:
 2 "A secondary device?"
 3 You say:
 4 "Yeah."
 5 He says:
 6 "Yeah."
 7 "So I've given authority for the ARVs to do an
 8 emergency search of the — premises, obviously bearing
 9 in mind we've still got a load of casualties there as
 10 well."
 11 "Yeah, okay."
 12 "Okay?"
 13 And the conversation then comes to an end.
 14 If it proves to be the case that the
 15 Silver commander didn't know what Operation Plato, which
 16 had just moments earlier been declared, was, that would
 17 be an unsatisfactory state of affairs?
 18 A. Not ideal, yes.
 19 Q. And the reason why "not ideal", might I suggest, not put
 20 it high enough is because it might be thought that to
 21 devise a tactical plan for an operation was, after all
 22 to be Superintendent Nawaz's job, you need to know what
 23 that operation is and involves?
 24 A. Yes.
 25 Q. And as I hope I made clear, I'm not suggesting fault on

1 the part of Superintendent Nawaz for not knowing if
 2 that's the position, that might well be down to those
 3 who had responsibility for training him and putting him
 4 in that position. We'll need to wait and see.
 5 Next, let's move back to the chronology, and I'm
 6 going to take you to 23.42. So this is 1 hour and
 7 11 minutes after the explosion and it is about
 8 36 minutes before you are relieved as tactical firearms
 9 commander.
 10 At that stage, you had a conversation with
 11 Chief Inspector Rachel Buckle, the cadre TFC.
 12 A. Yes.
 13 Q. Again, we have a transcript of this conversation and
 14 I want to draw it to your attention. It's
 15 {INQ018857T/2}.
 16 We don't need to read all of this out. Towards the
 17 bottom of the page we can see you say to the cadre
 18 tactical firearms commander:
 19 "Yeah. Right okay. So what's the plan for the
 20 handover? Obviously you've got Mark Dexter..."
 21 "He's ground—assigned."
 22 "So he's ground—assigned now so he can control
 23 there."
 24 "Yeah."
 25 "Obviously we're currently — we've got to set up

1 Silver. Where are you now?"
 2 "I'm at Silver."
 3 So this is a development. She has got from where
 4 she was at home and now she's at Silver, as I indicated,
 5 at 23.42.
 6 You say:
 7 "You're at silver now?"
 8 She answers:
 9 "Yeah, with Gold and everybody else."
 10 And you say:
 11 "Right."
 12 Over the page {INQ018857T/3}, please. You say:
 13 "So when you're in a position to take over it'd be
 14 much appreciated."
 15 "Okay."
 16 "But obviously not until you're ready -- not until
 17 you're ready to."
 18 "Right, okay. I don't know if you're ever going to
 19 be ready for these types of ones. Have you got other
 20 jobs ongoing at the moment?"
 21 "Ma'am, I'll still assisting. I've obviously got
 22 the rest of the force room but that's by the by."
 23 And you then indicate that you are happy to continue
 24 for the moment.
 25 Although you indicated that she would take over when

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1 she was ready and you were happy to carry on for the
 2 time being, were you by this stage, at nearly 11.45,
 3 very keen for the TFC role to be taken from you?
 4 A. Extremely.
 5 Q. Chief Inspector Buckle was by this stage, as we've seen,
 6 at Silver with the Gold commander. Do you know why she
 7 didn't take over the TFC role at that stage?
 8 A. I didn't know at that time. I subsequently understand
 9 or understood why there was a delay in that handover.
 10 Q. I'll ask you in a moment to give that explanation. But
 11 in the result on the night, were you surprised that it
 12 was 35 minutes or 36 minutes later that you were
 13 relieved of that stressful duty?
 14 A. Yes.
 15 Q. I said I'd give you an opportunity to give what you
 16 understand to be the reason for that delay. What is it,
 17 please?
 18 A. The TFC, as soon as they're in a position to take over
 19 the running of a firearms incident from the ITFC, should
 20 do so. I believe that potentially the fact that she was
 21 at force headquarters gave her -- put her in a position
 22 where she could potentially have taken effective command
 23 and control earlier. However, I do understand that
 24 a decision was made, and I'm not sure by whom, that
 25 rather than hand it over twice, ie me to her and then

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1 her to the specialist TFC who was going on,
 2 Superintendent Thompson, that I would just remain with
 3 it. That's not an ideal state of affairs, but it was
 4 a decision that was made on the night.
 5 SIR JOHN SAUNDERS: Were you told it at the time?
 6 A. No.
 7 MR GREANEY: The upshot of all of this was that you were
 8 termed the initial tactical firearms commander, weren't
 9 you?
 10 A. Yes.
 11 Q. But it might be suggested that there wasn't much initial
 12 about you being the tactical firearms commander for
 13 going on for an hour and 45 minutes?
 14 A. No.
 15 SIR JOHN SAUNDERS: You should at least know what's going
 16 on.
 17 A. Yes, sir.
 18 MR GREANEY: Topic 9, and I'm nearing the end of my
 19 questions. I indicated that I would come to another
 20 example of the performance of Mr Myerscough, which may
 21 indicate that he wasn't suited, perhaps through no fault
 22 of his own, to the role he was given. This takes us to
 23 23.50 hours and to a discussion that he had with
 24 Andy Berry, who was the GMFRS NILO. I haven't given you
 25 any warning of this, Mr Lopez, it is on Magnum. I'm

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1 going to give you reference to a recording,
 2 {INQ018335A/1}.
 3 Once you have found the recording, it'll probably
 4 take a second or two to download it, I'm going to ask
 5 that you play between 22:19 -- it's not timed by the
 6 24-hour clock, but the counter time -- 22:19 and 27:04.
 7 This is Mr Myerscough and Mr Berry.
 8 (Pause)
 9 You don't have that. Well, then we'll ...
 10 SIR JOHN SAUNDERS: Do you want me to rise for 5 minutes?
 11 MR GREANEY: Yes, would you mind, sir?
 12 SIR JOHN SAUNDERS: Tell me when you're ready.
 13 (12.13 pm)
 14 (A short break)
 15 (12.20 pm)
 16 MR GREANEY: Thank you, sir, that was my fault, I'd given
 17 the wrong reference. I'm sorry. We'll lose no time
 18 because we'll treat that as having been the break and
 19 now we'll sit through until 1 o'clock, which will give
 20 me time to finish and may even give Mr Horwell a chance
 21 to finish as well but we'll see.
 22 I'm now going to ask that we play that discussion
 23 between Mr Myerscough and Mr Berry, which starts at
 24 23.50 hours, as I have said. There is a gap in the
 25 middle of it, chief inspector, when in fact

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1 Mr Myerscough is consulting you. I'm not going to stop
 2 the recording and we'll look at the discussion you have
 3 with him subsequently.
 4 Thank you very much, Mr Lopez. We can play that
 5 recording now. {INQ018835_C1/1}.
 6 (Pause)
 7 Mr Suter is going to have another attempt to see
 8 what's happening, sir.
 9 (Pause)
 10 (12.23 pm)
 11 (Audio recording played to the inquiry)
 12 (12.27 pm)
 13 MR GREANEY: So let's draw some of the strands together and
 14 then see what is being said to Mr Myerscough by others
 15 in the OCR. Andy Berry was the GMFRS NILO that night?
 16 A. Yes.
 17 Q. And he was, I think, someone that you knew?
 18 A. Yes.
 19 Q. Indeed, earlier that day, before the explosion, you had
 20 spoken to him, do you remember?
 21 A. I don't recall that, but it's very possible, yes.
 22 Q. It is apparent from what he was saying to Mr Myerscough
 23 that there was a desire on the part of the Fire and
 24 Rescue Service to deploy at least their MTFA capability
 25 to the scene; do you agree?

1 A. Yes.
 2 Q. But he wanted an FCP so that he could co-locate, as he
 3 said it, with the Ambulance Service?
 4 A. Yes.
 5 Q. That was an entirely reasonable request for Mr Berry to
 6 make; do you agree?
 7 A. Yes.
 8 Q. And really, not only reasonable but necessary if JESIP
 9 was to be achieved?
 10 A. Yes.
 11 Q. Do you agree that Mr Myerscough didn't appear to know
 12 what an FCP was or the difference between an FCP and
 13 an RVP?
 14 A. Yes.
 15 Q. And ultimately, that conversation was of no use to
 16 Mr Berry, the NILO, was it?
 17 A. No.
 18 Q. Let's see what was being said in the OCR. This takes us
 19 to the transcript, Mr Lopez, and thank you for sorting
 20 out the playing of the audio, {INQ024325/37}.
 21 This is how Mr Myerscough first of all comes up with
 22 Central Park. In the middle of the page, Mr Myerscough,
 23 this is one of the gaps in the recording says:
 24 "We've got NILO on the phone."
 25 Unknown male:

1 "Oh is that ..."
 2 And Mr Core who had by this stage taken up the FDS
 3 role says:
 4 "The fire station (sic)... Central Park."
 5 As we heard, that's the first information that is
 6 given to Mr Berry, do you agree?
 7 SIR JOHN SAUNDERS: Does he actually say "station"? It's
 8 in the transcript it says "the Fire Service".
 9 MR GREANEY: Sorry, sir, I've not understood.
 10 SIR JOHN SAUNDERS: Mr Core, on my transcription says, "the
 11 Fire Service".
 12 MR GREANEY: What did I say?
 13 SIR JOHN SAUNDERS: "The fire station". It makes more
 14 sense, "fire station".
 15 MR GREANEY: My transcript reads:
 16 "The Fire Service [inaudible] Central Park."
 17 So I misread that, that's unfortunate. I'm sorry.
 18 SIR JOHN SAUNDERS: It's not important, I was just checking
 19 whether you had the correct version.
 20 MR GREANEY: So that's where Central Park seems to come from
 21 in the conversation. That comes from your FDS. Then if
 22 we go over the page to {INQ024325/38}, we see where
 23 Boddington's comes from.
 24 At the top of the page:
 25 "Just spoke to NILO..."

1 Says someone, probably -- well, it would either be
 2 the FDS or it would be the person answering the FDO's
 3 phone, Mr Myerscough. And you say in reply to the
 4 question, "What's the forward command point?":
 5 "The forward command point is -- well, they
 6 shouldn't have a forward com -- oh the Fire Service? If
 7 they go to the Boddington's, the old Boddington's car
 8 park, which is opposite the arena, they'll know where
 9 it is. Just have them there for the time being, they
 10 don't need to go right to the scene."
 11 So you appear to be saying that the Fire Service
 12 don't need a forward command point.
 13 A. No, that's not how I read it.
 14 Q. Tell me how you read it.
 15 A. Very much that I've jumped in saying:
 16 "Forward command -- they don't need a forward
 17 command point", and, "Oh the Fire Service", which is
 18 I presume, for whatever reason, I had another --
 19 certainly not the Fire Service in mind at that point and
 20 then it's clicked that we're talking about the Fire
 21 Service. I'm not telling the Fire Service they don't
 22 need a forward command point.
 23 Q. Well, were you giving them a forward command point?
 24 A. As we discussed yesterday or as I mentioned yesterday,
 25 my assessment of an RVP initially should be -- can

1 double up as the FCP as well. I know we're well into
 2 the incident here.
 3 Q. We are, nearly an hour and a half after the explosion.
 4 A. Yes. I should have known where the forward command
 5 point was, the official forward command point, and under
 6 JESIP they most definitely should have been told where
 7 the best location was for them to muster. I think
 8 because at that point I'm still thinking that I don't
 9 want to send them directly to the scene and
 10 Boddington's -- I think at that point as well there was
 11 some issue around the security at the Cathedral car park
 12 due to the suspect package, if my timings are right.
 13 I think that's where I've identified Boddington's
 14 because it is a big car park and obviously can hold
 15 their equipment. But yes, ideally, he should have been
 16 given a better location.
 17 Q. Is it ideally or is it necessarily?
 18 A. I'd say necessarily.
 19 Q. Because the very essence of JESIP, indeed the first
 20 principle, is co-location.
 21 A. Yes.
 22 Q. Each of the emergency services ought to have been given
 23 an FCP so that co-location could occur?
 24 A. Yes, as the incident progressed.
 25 Q. Can we agree that what we've heard in that recording, as

1 informed by the transcript, is in fact the very
 2 antithesis of JESIP working?
 3 A. Yes.
 4 SIR JOHN SAUNDERS: Had anyone else been given Boddington's
 5 as the RVP point?
 6 A. I think there'd been a new location. Boddington's, from
 7 local knowledge, is the other side of the arena. We
 8 talked about the Trinity Way entrance and it's opposite
 9 the road from the Trinity Way entrance. It's a large
 10 car park, which is ideal. Certainly if at that point,
 11 and again I apologise if I've got the chronology
 12 wrong -- however with the potential of the suspect
 13 package at the cathedral, then the Cathedral car park
 14 was no longer a safe location for an RVP. I don't know
 15 if I directed firearms resources from other forces
 16 towards the Boddington's area or certainly Trinity Way.
 17 MR GREANEY: I think I might have an answer to that
 18 question, sir, given your interest in the issue. If we
 19 go to page 31, I think it's the first reference to
 20 Boddington's in the transcript {INQ024325/31}, the top
 21 half of the page.
 22 There's a reference by Mr Herrington, the RV for the
 23 mutual aid, which would be the armed assets from other
 24 forces, is that correct --
 25 A. Yes.

1 Q. -- is the Old Boddington's site, so certainly not being
 2 described as an FCP, it's just a place for effectively
 3 officers from other forces to muster.
 4 A. Yes.
 5 Q. I'm very much towards the end of my questions about
 6 part 6 of my structure and then we'll deal very shortly
 7 with what went well and what didn't go well.
 8 Finally on this topic, the events of the 22nd, after
 9 you had been relieved as the tactical firearms commander
 10 by, it turned out, Superintendent Thompson at 00.17 or
 11 00.18, as you told us yesterday, the pressure dropped
 12 off?
 13 A. Yes.
 14 Q. Subsequently to that, you were spoken to by
 15 Superintendent Hill. We don't have this on the
 16 transcript, I don't think, but we do have it in the
 17 schedule. I'll give the reference, sir, but I don't
 18 suggest you try to find it. It's just a very short
 19 conversation I need to read out. It's 9973, the time is
 20 00.41.25, so it probably is somewhere in the transcript
 21 but I didn't find it. Superintendent Hill, just remind
 22 us of the role that he had by that stage, Silver?
 23 A. He'd taken over Silver from Superintendent Nawaz,
 24 I believe.
 25 Q. He says to you in a conversation:

1 "Right. Have we declared major incident or critical
 2 incident yet?"
 3 We'll remember this is almost exactly 2 hours
 4 10 minutes after the explosion.
 5 You reply:
 6 "No, I haven't."
 7 Superintendent Hill:
 8 "Right, I'll sort that then."
 9 You say:
 10 "I'm just dealing with the Plato."
 11 So was that correct, in your period as the tactical
 12 firearms commander, and indeed as the FDO commanding the
 13 situation more generally, had you declared a major
 14 incident?
 15 A. No.
 16 Q. Why not?
 17 A. I didn't believe it necessary. The fact that I declared
 18 Op Plato, to me, was... Again, there is the issue
 19 around the notification to other services about that.
 20 However, declaring Op Plato -- sorry, declaring a major
 21 incident, in my opinion, didn't affect the way in which
 22 we policed or other emergency services reacted to the
 23 incident. Everyone knew what they were dealing with.
 24 It didn't need a label putting on it, in my opinion.
 25 Q. But declaring a major incident doesn't simply involve

1 putting a label on something, it also involves the
 2 implementation of a plan, does it not?
 3 A. Yes, which was being put into place anyway.
 4 Q. Did you make a decision not to declare a major incident
 5 or did you just in the pressure of that period of time
 6 omit to do so?
 7 A. I would say that I was aware that ideally under normal
 8 circumstances a major incident should be declared. It
 9 was a fleeting thought and I would assess that under the
 10 pressures that I was dealing with, it didn't appear much
 11 more than a very brief consideration.
 12 Q. Now you look back, was it an error not to declare
 13 a major incident?
 14 A. Ideally, as I said, policy dictates that a major
 15 incident should be declared for the very reason
 16 in relation to the METHANE update, et cetera. If I had
 17 done that and given a METHANE update, then that would
 18 have been to the other emergency services and I take you
 19 back to my rationale for not informing them initially of
 20 Op Plato.
 21 So in that aspect, no, I don't agree that it was
 22 a mistake. Did it affect the way that all the emergency
 23 services set themselves up and responded to the
 24 incident? No, I don't believe it did. So I don't see
 25 what we missed by me not verbalising a major incident.

1 I think I was aware that BTP had already declared
 2 a major incident and it just needs one partner to
 3 declare a major incident, it doesn't need all three to
 4 declare a major incident.
 5 Q. Have I correctly understood that your reasoning or
 6 principal reasoning for not declaring a major incident
 7 really circles back to where we started, namely that you
 8 didn't do so because you didn't want to alert your
 9 emergency service partners to the fact that you had
 10 declared Operation Plato?
 11 A. That was part of the rationale but not the whole
 12 rationale for doing it or not doing it.
 13 Q. That concludes my questioning on the events of the night
 14 or the facts of the night, so part 6. As I indicated,
 15 part 7 will involve me giving you an opportunity to
 16 identify what went well that night and also what did not
 17 go well.
 18 Do you in your opinion — did anything go well? If
 19 so, what?
 20 A. Absolutely.
 21 Q. What went well?
 22 A. The response by all emergency services and members of
 23 the public to the incident, I think is almost faultless.
 24 In the cold light of day you can look at every action
 25 that people did or didn't do, but everyone tried and did

1 their absolute best on that night, whether it was from
 2 the emergency services, members of the public or
 3 whatever.
 4 Q. I'm going to ask you to pause for one moment, but
 5 obviously I will give you an opportunity to give your
 6 full answer. Are you there praising those who were on
 7 the ground and went into the City Room?
 8 A. I'm praising everyone involved and I'm not just talking
 9 about those at the site. I'm talking about those within
 10 control rooms as well who had the pressure of managing,
 11 certainly within GMP, all the call-takers who were
 12 taking the harrowing information, those people who came
 13 in whilst not on duty to assist. It's the whole gambit
 14 (sic). I think the way the emergency services
 15 responded, albeit outside the JESIP principles to
 16 a certain degree, is absolutely commendable. I do not
 17 believe that with the situation as it was that we could
 18 have done much more to maximise, in my opinion, the
 19 survivability and response to the injured and,
 20 unfortunately, those who became victims.
 21 Q. You say that JESIP, I think your phrase was, failed to
 22 a certain degree. Can I invite to you consider whether
 23 that night at a command level there was no joined-up
 24 working and in fact JESIP entirely failed?
 25 A. I disagree with that as well. I think in the early

1 stages of the incident, then JESIP was potentially
 2 non-existent. I concede to that and there's various
 3 reasons for why we got to that position and I take
 4 responsibility for some of that. However, the JESIP
 5 principles, I believe, are geared more towards the
 6 longer term response to an ongoing protracted incident,
 7 which obviously this was becoming, and therefore the
 8 implementation of the Silver control and those who
 9 attended there, who then started the TCG, the SCGs, is
 10 where I think JESIP started to play its part.
 11 Q. Where something as terrible as a terrorist outrage
 12 occurs, does there need to be a speedy emergency
 13 response?
 14 A. Very much so.
 15 Q. And does JESIP involve, as early as possible, the
 16 commanders, the Silver commanders, getting together at
 17 a single location called an FCP?
 18 A. Yes.
 19 Q. So that they can communicate with each other?
 20 A. Yes.
 21 Q. And coordinate?
 22 A. Yes.
 23 Q. Jointly understand risk?
 24 A. Yes.
 25 Q. And develop situational awareness?

1 A. Yes.
 2 Q. So that they can make a joint decision about what to do?
 3 A. Yes.
 4 Q. And none of that happened, did it?
 5 A. For the reasons I've given through my evidence, and
 6 again I take responsibility for that, but overarching
 7 throughout this incident was the intention to save
 8 lives, and that was what I was working to.
 9 Q. Just to return to my question, if those things didn't
 10 happen there was, was there not, a total JESIP failure
 11 in those respects?
 12 A. In the early stages, yes.
 13 Q. And can I invite you to add to that "in the critical
 14 early stages"?
 15 A. Again, I have given my rationale for why I played my
 16 part in JESIP not being implemented. I still hold today
 17 that that was the correct decision for the reasons I've
 18 given. I do not believe that you can expect in the
 19 early stages of a significant and horrendous incident as
 20 officers and commanders were faced with on that night
 21 for a clear command structure, clear JESIP working
 22 protocol, to be put in place in the first critical
 23 moments of an incident.
 24 Was there opportunities for that to be addressed as
 25 the incident progressed? Yes, obviously there was.

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1 However, to suggest that JESIP should have been put in
 2 place immediately I think is a bit naive when you're
 3 looking at the practical implications of that, faced
 4 with such a horrendous situation.
 5 Q. I don't want to be naive and I wasn't suggesting that
 6 the second after an incident, all the principles can be
 7 put into effect. But as soon as possible, the
 8 Silver commanders should co-locate, should they not?
 9 A. Yes.
 10 Q. And it all flows from that?
 11 A. Yes.
 12 Q. And that didn't happen?
 13 A. No.
 14 Q. And the principal reason it didn't happen, whether that
 15 reason was a good one or a bad one, was because of the
 16 decisions you made?
 17 A. Yes.
 18 MR GREANEY: Chief inspector, thank you very much indeed for
 19 answering my questions. I rather optimistically
 20 suggested that there might be an opportunity for
 21 Mr Horwell to ask and conclude his. I will ask him
 22 whether he would prefer an early finish and an earlier
 23 start or whether he'd like to make a start on his
 24 questioning.
 25 MR HORWELL: Sir, I think this is the moment when the

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1 advocate on his feet says he'll be shorter if the
 2 adjournment could be taken now. I am happy to start.
 3 SIR JOHN SAUNDERS: If it's going to be shorter.
 4 MR HORWELL: Sir, could I use a minute or two? You have
 5 rightly raised concern, as have others, about the media
 6 calls that night and you said that there will be an
 7 answer.
 8 In the lessons learnt statement of Mr Pilling, the
 9 problem caused by the media calls was addressed -- and
 10 it's only a short summary because this is a large
 11 schedule. In the summary, it is made clear that
 12 a technological solution to achieve a switching of the
 13 calls, and I imagine that means a diversion, was not
 14 currently available. So the press office had an
 15 arrangement with the press that in times of emergency,
 16 the press would be contacted and told not to contact the
 17 FDO and to direct the media to social media updates from
 18 GMP.
 19 That statement and that schedule were written nearly
 20 a year ago and Mr Pilling is in the course of making
 21 a further statement to update the position as set out in
 22 this schedule. I do know that there is now a dedicated
 23 line for the media so things have moved on since this
 24 schedule. So when the media call the operations room,
 25 because it's a dedicated line, operators are able to

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1 either ignore or cancel the calls and therefore the
 2 interruption is as minor as can be.
 3 So GMP have considered the problem and done their
 4 best to address it. I will ensure that in the statement
 5 that Mr Pilling is in the course of making, he will
 6 bring you up to date and, I'm sure, will be able to
 7 supply more information.
 8 SIR JOHN SAUNDERS: I'm grateful. I'm sorry for forgetting
 9 that part of the lessons learnt document.
 10 MR HORWELL: No, sir, it's a very long schedule.
 11 SIR JOHN SAUNDERS: So, 1.50? Thank you.
 12 (12.50 pm)
 13 (The lunch adjournment)
 14 (1.50 pm)
 15 SIR JOHN SAUNDERS: By how much have you cut down what you
 16 were going to say, Mr Horwell?
 17 MR HORWELL: Enormously.
 18 SIR JOHN SAUNDERS: Oh, thank you very much. I'm reassured.
 19 Questions from MR HORWELL
 20 MR HORWELL: Mr Sexton, you've been asked a lot of questions
 21 about the third edition of JOPs. If we could have the
 22 cover sheet of that document, please, on the screen;
 23 that's {INQ008372/1}.
 24 That is a document with which you were familiar,
 25 Mr Sexton?

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1 A. Yes.
 2 Q. You relied in part on that document when creating your
 3 aide-memoire?
 4 A. Yes.
 5 Q. If I have understood your evidence correctly, you
 6 believe that it is inflexible in its approach?
 7 A. Yes, to a certain degree.
 8 Q. And you used words such as "too rigid" and "too formal"?
 9 A. Sorry, what was the last?
 10 Q. Too formal.
 11 A. Yes, I believe so.
 12 Q. We know that the genesis of this document is the Mumbai
 13 attacks which occurred in 2008, but is it your
 14 understanding that from the way this document is
 15 drafted, it applies to a much wider category of attack
 16 than the one that took place in Mumbai?
 17 A. I wouldn't say much wider.
 18 Q. A wider. Leave out the much. A wider category of
 19 attack?
 20 A. Yes, I think so.
 21 Q. Let us not lose sight of the obvious. It is a document
 22 that is directed at the response to a marauding
 23 terrorist firearms attack, and the word firearms is
 24 obviously important. But in terms of the language used
 25 in the document -- and you've commented on some of

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1 this -- if we could go to {INQ008372/4}, please. It's
 2 the definition of hot zone which just below the middle
 3 part of that page:
 4 "Where the attackers are present and/or there is an
 5 immediate threat to life."
 6 Did you understand "there is an immediate threat to
 7 life" capable of covering a secondary device?
 8 A. Yes, but that is once the Op Plato has been declared and
 9 we're looking at the zones, yes.
 10 Q. Yes.
 11 A. Yes, very much so.
 12 Q. We know from one of the transmissions from the OFC,
 13 Eddie Richardson, I won't ask for it to be put up but
 14 it's at page 10 of your dictaphone transcript, that he
 15 commented about the number of packages that had been
 16 left by people as they ran out of the City Room.
 17 A. Yes.
 18 Q. Were those packages of concern to you?
 19 A. Yes.
 20 Q. Could we go to page 6, please {INQ008372/6}?
 21 SIR JOHN SAUNDERS: Just before we go, your position is that
 22 although the threat of a secondary device would not
 23 justify the declaration of Plato, it would justify its
 24 maintenance?
 25 A. Under these circumstances, yes, sir.

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1 SIR JOHN SAUNDERS: Thank you.
 2 MR HORWELL: But you were still concerned about a shooter --
 3 A. Yes, as well.
 4 Q. -- for all of the reasons that it is unnecessary to
 5 rehearse?
 6 If we go to {INQ008372/6}, please. It's the section
 7 at the top "Introduction":
 8 "A terrorist attack involving the use of firearms in
 9 a way designed to inflict large numbers of casualties
 10 and fatalities would present significant challenges for
 11 the emergency services. A marauding terrorist firearms
 12 attack (MTFA) may [that's an important word] involve
 13 [first of all] shootings."
 14 It doesn't suggest it must involve shootings.
 15 A. That's correct.
 16 Q. And it may involve the use of explosives, which is
 17 obviously pertinent here.
 18 A. Yes.
 19 Q. One further section at {INQ008372/16}, please --
 20 SIR JOHN SAUNDERS: On your interpretation, the one you're
 21 suggesting, and I know you're not giving the evidence,
 22 it makes the name marauding firearms terrorist attack
 23 rather odd if you're saying it doesn't need to involve
 24 shooting.
 25 MR HORWELL: If you're interested in my interpretation --

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1 SIR JOHN SAUNDERS: Absolutely.
 2 MR HORWELL: It certainly requires a belief that firearms
 3 are present because that is implicit in the first line
 4 of that paragraph, but it doesn't require that there
 5 have been actual shootings.
 6 SIR JOHN SAUNDERS: That's the distinction you're drawing?
 7 MR HORWELL: Yes, in my view that must be the interpretation
 8 of that section. Sir, as you have said, I well
 9 understand that there is a degree of artificiality to
 10 this because no one could or should have expected
 11 Mr Sexton to go through this like a Chancery lawyer.
 12 SIR JOHN SAUNDERS: But I am going to need to be helped, not
 13 by a Chancery lawyer, but on ordinary interpretation of
 14 what this does mean and is known to mean at some stage.
 15 I'm not asking you to be a Chancery lawyer.
 16 A. No.
 17 MR HORWELL: At page 16, just as one further reference to
 18 the width of definitions that can be found in this
 19 document, page 16, 4.15, I will read the first paragraph
 20 and then come back to the obviously important words:
 21 "As soon as it is confirmed that the firearms threat
 22 and other risks have been neutralised for a particular
 23 location, this must be shared immediately with FRS and
 24 ambulance counterparts..."
 25 So that is contemplating the threat from firearms,

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1 of course, but also other risks .
 2 A. Yes.
 3 Q. Would you conclude that that can involve explosives?
 4 A. Yes.
 5 Q. You were asked this morning about the effect or
 6 certainly one of the effects of your declaration of
 7 Plato. It was put to you that there was no good reason
 8 to prevent paramedics flooding into the City Room,
 9 Mr Sexton. Have you been following the evidence?
 10 A. Yes, in parts.
 11 Q. When you have been able to?
 12 A. Yes.
 13 Q. It is clear that Plato had no influence on the decisions
 14 made by NNAS at the scene because they weren't aware
 15 that Plato had been declared.
 16 A. That's correct.
 17 Q. Were you aware, as we were told in the course of
 18 evidence, that NNAS didn't use Plato documents for the
 19 simple reason that they were unaware that Plato had been
 20 declared, but they used their own major incident
 21 documents, which had within them zones? And it was for
 22 that reason that they were not prepared to send
 23 paramedics into the City Room. Do you remember that
 24 evidence?
 25 A. Vaguely, yes.

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1 Q. That had nothing to do with you?
 2 A. No.
 3 SIR JOHN SAUNDERS: Okay, just so you do understand what the
 4 proposition is -- and I don't think I actually used
 5 those words, it wasn't me, but I think what is
 6 contemplated is, and one of the reasons for actually all
 7 getting together, is when the police commander is
 8 satisfied that it is safe for everyone to go in the area
 9 where the casualties are to help them, they can get
 10 together, the ambulance and the police commander, the
 11 police commander says, "You can send as many as you like
 12 in there, it's perfectly safe". It's absolutely correct
 13 that NNAS themselves were treating not only the
 14 City Room but actually the platform as well, the bridge
 15 over, as being an unsafe place to go to. And what's
 16 being suggested, and I understand the restriction of the
 17 question, is: had they known that completely, with
 18 people up there crying out for paramedics -- sorry to
 19 use that word -- asking for paramedics to come, everyone
 20 would have known the real position? Does that put the
 21 proposition more fairly perhaps?
 22 MR HORWELL: Yes, it does. If I could ask one question
 23 arising from that.
 24 SIR JOHN SAUNDERS: Certainly. Not of me, of the witness.
 25 MR HORWELL: Mr Sexton, could you ever have declared the

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1 City Room completely safe?
 2 A. No.
 3 Q. Finally for the moment, on your declaration of Plato,
 4 would you agree that anyone who suggests that your
 5 declaration should have been rescinded within
 6 13 minutes, in other words by 11 pm that night, lacks
 7 operational experience?
 8 A. Most definitely .
 9 Q. Your preparedness for this dreadful event. I'm not
 10 going to take you through the paragraphs because there
 11 are many of them and they are set out in your witness
 12 statement, but in your witness statement, and I refer
 13 of course to your first witness statement, you set out
 14 very carefully the intense training which is required
 15 before a police officer can become an FDO.
 16 A. Yes.
 17 Q. And you have given evidence to that effect yesterday.
 18 In a city the size of Manchester, FDOs and the
 19 operations room were and are regularly tested, would you
 20 agree?
 21 A. Yes.
 22 Q. You had been a police officer for over 20 years when you
 23 became an FDO?
 24 A. Yes.
 25 Q. The FDO training course assessed the candidate's ability

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1 to process a great deal of information and to make
 2 quick, sound decisions?
 3 A. Yes.
 4 Q. In terms of Plato training, as a tactical firearms
 5 commander and an FDO, you participated in Plato
 6 awareness training events and exercises?
 7 A. Yes.
 8 Q. By the night of this attack, you were familiar with the
 9 JESIP principles?
 10 A. Yes.
 11 Q. Plato?
 12 A. Yes.
 13 Q. Plato zones?
 14 A. Yes.
 15 Q. And the importance of an RVP or an FCP in bringing the
 16 emergency services together and achieving a joint
 17 situational awareness?
 18 A. Yes, it wasn't a new idea to me.
 19 Q. One aspect of your training that we haven't heard about
 20 in this hearing, but it's set out in your witness
 21 statement, is that you performed the role of ITFC during
 22 two night training exercises at Manchester Airport.
 23 A. Yes.
 24 Q. You have described those exercises as being invaluable
 25 in gaining an understanding as to how MTFAs develop?

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1 A. Yes.
 2 Q. And how zones are categorised?
 3 A. Yes.
 4 Q. And the effects of those categories?
 5 A. Yes.
 6 Q. As you heard the information coming in, at one stage
 7 possibly not a terrorist attack at all, but that stage
 8 didn't last for long and as the information came before
 9 you, you started to understand what it was that had
 10 taken place at the arena?
 11 A. Yes.
 12 Q. You said in your statement that at that stage you were
 13 confident in your training and your experience.
 14 A. Yes. I still feel that that was the case.
 15 Q. There's a long passage from your Kerslake interview.
 16 I think because it is long, in fairness to you, it
 17 should be put on the screen. It is {INQ023523T/49},
 18 please.
 19 If we could start with the top half. It's the
 20 answer starting "most definitely", if we could look at
 21 that, please.
 22 You said there to the Kerslake committee:
 23 "I volunteered on numerous occasions to take part in
 24 terrorist exercises, Op Plato type exercise, at the
 25 airport and other places. I've done quite a few where

1 they've required an initial tactical firearms commander,
 2 but it's more not testing the ITC, the ITFC, it's about
 3 the ARVs, the firearms officers, on the ground knowing
 4 what it's like. So it was more for that. But having
 5 done those exercises, although I didn't think
 6 I personally got much out of them at the time, on the
 7 night it's... I found it... I found that I was able to
 8 maintain command and control, give clear direction,
 9 because it was almost like an exercise. So I was
 10 drawing on what I'd learned in various live exercises
 11 and putting them into practice in the real situation.
 12 "It was almost like -- my view was, right, deal with
 13 this as you would deal an exercise: calm, be clear, have
 14 command and control. That's the approach I took. Done
 15 a number of tabletop exercises which I thought I didn't
 16 get anything out of, but it's amazing. Actually, you
 17 know what? When push comes to shove, it works."
 18 And you go on to say that it could quite easily have
 19 been a very different type of night without those
 20 training exercises.
 21 A. Yes.
 22 Q. Does that summarise your view of the assistance that
 23 those exercises gave to you?
 24 A. Yes.
 25 SIR JOHN SAUNDERS: I want to dig down on that a bit because

1 it's something that does interest me. There are certain
 2 things that you do in your job every day of the week,
 3 it's almost automatic what you do. And you've been
 4 telling us how in that first critical hour or half hour,
 5 whatever, the difficulties of setting up JESIP
 6 principles. I wonder whether the difficulty's caused by
 7 the fact that you're not doing it on a regular basis,
 8 I think it may have been your phrase, it hadn't become
 9 part of your muscle reaction to what's happening.
 10 A. Muscle memory.
 11 SIR JOHN SAUNDERS: Yes. Because there's no reason in
 12 theory why JESIP principles shouldn't be absolutely
 13 there, instantaneously, as soon as it starts your
 14 thinking in your mind: JESIP, we've got to get everyone
 15 there, we've got to think about an RVP.
 16 No one went to the same RVP, it's quite
 17 extraordinary, on this night, not just -- a forward
 18 control point, no one thought of that. No one was
 19 thinking of commanders getting together. You are
 20 focused very much on the gunman and I just wonder
 21 whether -- is there an inherent reason in JESIP why it
 22 shouldn't operate from the start of an incident or is it
 23 just that because it only happens fortunately rarely,
 24 it's just not part of what you say is the automatic
 25 reaction?

1 A. I think, sir, these types of incidents or even your
 2 major types of incidents are not our everyday incident
 3 that we deal with. I think that if you look at JESIP as
 4 a tool to manage major incidents, despite what I did on
 5 the night, I do believe that it is a worthwhile tool,
 6 most definitely. What I struggle to agree with is that
 7 there should almost be a very well-formalised JESIP
 8 model in place very early doors of an incident
 9 developing.
 10 I think it's almost done that it should be almost
 11 broken down and done at stages and I agree that one of
 12 the quick and crucial parts, if we put aside the
 13 rationale I have given for why I didn't do it, is all
 14 the commanders getting together, the five key principles
 15 of JESIP, most definitely, at the location. Everything
 16 else from there can flow from there once you've got a
 17 more slow-time process or a slow-time period within that
 18 incident.
 19 So JESIP as a principle, I do agree with. Aspects
 20 of that, it doesn't need much to understand the -- by
 21 all people having some kind of command and control over
 22 resources at the scene, all working for the same goal
 23 and understanding each other's requirements, has to be
 24 beneficial.
 25 SIR JOHN SAUNDERS: Let me cut you off for a moment, I'm

1 sorry to interrupt you, and I am taking note of what you
 2 are saying, I assure you.
 3 What you're saying to Lord Kerslake is the training
 4 really helped you, including the JESIP training. The
 5 JESIP training doesn't say: well, don't bother about it
 6 for the first half hour or so, get yourselves all sorted
 7 out and then think about a bit later down the line.
 8 A. Yes.
 9 SIR JOHN SAUNDERS: It didn't help you, did it, training,
 10 in that way?
 11 A. Yes, it did help me, sir. I think as I said in my
 12 statement, my priority became my ITFC role and not my
 13 force duty officer role. There has to be a clear
 14 distinction between the two. The force duty officer
 15 role implements JESIP and if it had been a normal --
 16 normal... a major incident which we recognised and, as
 17 I said, it was a post-event, as in there was no ongoing
 18 uncontrollable threat, then JESIP would have worked.
 19 But that would have been the FDO side of it and
 20 I wouldn't have been concentrating on the firearms side.
 21 But because of the competing demands between the
 22 ITFC role and the FDO role, well, hands down ITFC
 23 command is always going to take priority because of the
 24 immediate risk to life.
 25 SIR JOHN SAUNDERS: I understand that and it chimes actually

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1 with what we have heard from the other emergency
 2 services to an extent, the police attitude, as they
 3 thought of it, when they were practising these sorts of
 4 exercises. They were saying: the police were really
 5 only interested in the gunman and once they've got the
 6 firearms through, then they really just veer off home,
 7 really, they weren't really interested in the rest of us
 8 coming up and indeed they forgot about us in one of the
 9 operations. I wonder if that is always going to be
 10 a problem that you can only actually concentrate on the
 11 firearms, you can't be doing both.
 12 A. As an FDO, or as an ITFC, I don't believe you can do
 13 both.
 14 SIR JOHN SAUNDERS: Okay.
 15 A. I very much don't believe you can do both.
 16 SIR JOHN SAUNDERS: I'm sorry, it's something I wanted to
 17 ask and it's a convenient time to do it.
 18 MR HORWELL: Not at all.
 19 The decisions that you made on the night, Mr Sexton.
 20 We have heard a lot of evidence about them. I'm going
 21 to take this as quickly as I can.
 22 It is clear from what you have said, and indeed from
 23 what you have written, that on that night you made
 24 a series of deliberate and considered decisions.
 25 A. Yes.

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1 Q. I'll come to them in a moment. You took a calculated
 2 risk to leave, as you describe them in your witness
 3 statement, vulnerable unarmed people at the scene to
 4 treat and evacuate casualties.
 5 A. Yes.
 6 Q. As you've already described, you made a number of
 7 dynamic risk assessments.
 8 A. Yes.
 9 Q. You have described, both at this hearing and in your
 10 statement, the fact that you made a deliberate decision
 11 not to bring fire to the scene.
 12 A. Yes.
 13 Q. And in terms of these various decisions you made, you
 14 wrote:
 15 "I made calculated decisions based on my assessment
 16 of the risk, but appreciate that it was not in
 17 accordance with agreed Plato policy."
 18 A. Yes.
 19 Q. That's paragraph 64. There's no need for it to be
 20 shown.
 21 So these considered, deliberate decisions you made
 22 involved a decision not to follow Plato policy?
 23 A. Yes.
 24 Q. Not to inform ambulance and fire that Plato had been
 25 declared?

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1 A. Yes.
 2 Q. And as we've just covered, not to bring fire to the
 3 scene and not to discuss or categorise zones?
 4 A. Yes.
 5 Q. Mr Sexton, just as you made those deliberate and
 6 considered decisions, you could equally have made
 7 another series of deliberate decisions such as to have
 8 followed Plato policy?
 9 A. Yes.
 10 Q. And to have informed ambulance and fire that Plato had
 11 been declared and everything that follows from that?
 12 A. Yes.
 13 Q. You could either have informed those organisations
 14 yourself or you could have delegated that task?
 15 A. Yes.
 16 Q. In terms of contacting those other organisations, there
 17 is a force duty cover daily sheet?
 18 A. Yes.
 19 Q. I can show you an example, but I'm sure you're more than
 20 familiar with the document.
 21 A. I'm very aware of it, yes.
 22 Q. On that daily sheet is the mobile number of the fire
 23 NILO?
 24 A. Yes.
 25 Q. And the number of the NWS control room?

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1 A. Yes.
 2 Q. So although, as we have heard, there were difficulties
 3 that others experienced contacting you, the operations
 4 room had a direct route of contact to the fire NILO and
 5 the ambulance control room?
 6 A. Yes. Those numbers were kept with the FDO though.
 7 Q. Yes. In JOPs 3 there is reference to a three-way
 8 telecommunication link between the emergency services
 9 control room.
 10 A. Yes, which is an inaccurate description, I believe.
 11 Q. All right. The principle --
 12 A. Yes.
 13 Q. -- the principle of the three, here it was four, as it
 14 happens, but the principle was that the three control
 15 rooms can be in contact with each other.
 16 A. Yes, via Airwaves rather than a telephony system.
 17 Q. Yes. Your plan to keep certain information away from
 18 fire and ambulance, that plan might have been ruined if
 19 there was a three-way link between the control rooms,
 20 would it not?
 21 A. Yes, I was aware of that.
 22 Q. Is that the reason why you did not ask for a three-way
 23 telecommunication link to be established?
 24 A. Yes, I think I've made it clear in my evidence that
 25 I really didn't want to publicise that and I would have

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1 had to on a three-way communication.
 2 Q. Your aide-memoire is my next topic. Mr Sexton, I think
 3 in essence --
 4 SIR JOHN SAUNDERS: I'm really sorry, it's a really --
 5 doesn't it strike you as a dangerous decision: that's
 6 the best means of communication with fire and ambulance,
 7 who I might well need at some stage and I'm just not
 8 going to use it because they might get to know my
 9 secret?
 10 A. That facility would have always been available to me,
 11 sir, if I wished to shout up and get direct contact with
 12 fire and NWS if the situation had significantly changed
 13 in a way that I thought I would need to have that
 14 contact. Yes, I was aware, very much aware, that it was
 15 a risky decision, which could have significant
 16 implications down the line, but I believed at the time
 17 it was the right decision to make. I understand fully
 18 the need.
 19 SIR JOHN SAUNDERS: You're under huge pressure. Things are
 20 coming in left, right and centre, you're having to cope
 21 with stuff, we heard it all, it's really difficult, and
 22 somehow you had a chance to think out what is quite
 23 a convoluted plan.
 24 A. It's not that convoluted, sir. It's very quick in your
 25 head.

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1 SIR JOHN SAUNDERS: It's got to be: who can I tell, how do
 2 I stop others getting to know it, which involves not
 3 setting up a telephone link which you otherwise would,
 4 can I tell so--and--so because he might go and tell
 5 so--and--so else? No?
 6 A. It wasn't a telephone link, sir, it's a radio link.
 7 However, in previous major incidents, that tri-service
 8 link had never, ever been used within the FDO role. It
 9 tends to come into play once the Silver command -- once
 10 force command module has been set up --
 11 SIR JOHN SAUNDERS: Okay. What is the reason why you didn't
 12 use it: because you had never used it or in order that
 13 they didn't get to know your secret?
 14 A. I think it was -- on the night it would be because we
 15 never use it, but I knew there were ways of contacting
 16 them if I wished to make that contact. But it was not,
 17 as I said before, muscle memory to use a tri-service
 18 radio channel.
 19 SIR JOHN SAUNDERS: Okay, thank you.
 20 MR HORWELL: Your aide-memoire, and I think in view of your
 21 previous answers, if you had followed that aide-memoire
 22 and the principles that sit behind it, then you would
 23 have informed these organisations that Plato had been
 24 declared and everything that flows from that?
 25 A. Yes.

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1 Q. Last section, command and control. If we confine
 2 ourselves to the language of JOPs and the other manuals,
 3 Dexter was either the ground-assigned TFC or, to use the
 4 language of JOPs, the police on-scene commander.
 5 A. In relation to a firearms deployment, yes. My
 6 expectation of Chief Inspector Dexter was that he was
 7 ground-assigned for the firearms aspect of the incident.
 8 I had no expectation of him taking command and control
 9 of unarmed resources other than to keep them safe,
 10 should the need arise.
 11 Q. But the two terms are interchangeable if you look at the
 12 documents -- and I'll take you to the paragraph if
 13 necessary, Mr Sexton -- and the ground-assigned TFC is
 14 the same as the police on-scene commander.
 15 A. That wouldn't be how I would read it and it could just
 16 be my lack of understanding then, full understanding of
 17 it.
 18 Q. Well, in fairness to you, let me take you to the
 19 document. Police on-scene commander, that is defined in
 20 JOPs in the glossary.
 21 A. Yes.
 22 Q. If you want to see it, I'll happily take you to it.
 23 A. No, sorry, sir, I now know what you mean. Yes, I'd
 24 agree to that. It is interchangeable as in the
 25 terminology.

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1 Q. If we then go to a document that you've seen already,
 2 it's the CTP NPCC Plato guidance and that is at
 3 {INQ007211/1}.
 4 Could you go, please, to {INQ007211/17} of the
 5 INQ version, it's page 16 of the document. That's the
 6 one, thank you.
 7 If we look at 7.2 at the bottom of the page:
 8 "In particular, forces should review their
 9 Operation Plato plans in relation to their ability to
 10 deploy a TFC to undertake the role of on-scene
 11 commander..."
 12 So that's the JOPs language; yes?
 13 A. Yes.
 14 Q. "... or ground-assigned TFC."
 15 My suggestion to you is that the two terms are
 16 interchangeable; do you agree or not? If you agree with
 17 me now, was that your state of mind at the time?
 18 A. Most probably, if we were looking purely within the
 19 firearms aspect of the deployment, yes, I'd say they're
 20 interchangeable, but to me, quite clearly the
 21 ground-assigned TFC is very much linked to the firearms
 22 aspect of it, where I think on-scene commander is
 23 slightly wider.
 24 Q. But it's the term in JOPs.
 25 A. Yes.

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1 Q. I understand what you're saying, Mr Sexton. Those are
 2 the documents. To use the JOPs language for a moment,
 3 Eddie Richardson, the OFC, starts as the police on-scene
 4 commander, and Dexter takes over from him?
 5 A. My understanding of it is that that is not the case.
 6 The OFC will always remain as the OFC, the operational
 7 firearms commander. Again, it could be my lack of
 8 understanding, but I would never have considered him to
 9 be the on-scene ground commander.
 10 SIR JOHN SAUNDERS: Can I just consider the practicalities
 11 of that with the operational firearms commander? What
 12 happened here is perhaps what would normally happen:
 13 firearms go in, their job is to clear the scene.
 14 Separately, unarmed officers will be, as here, clearing
 15 the entrance, trying to get the public away. How
 16 possible would it be for the OFC to command them as
 17 well?
 18 A. No, they couldn't command those; they're purely
 19 commanding the firearms assets.
 20 SIR JOHN SAUNDERS: Okay.
 21 MR HORWELL: There's always going to be a difference between
 22 practicality and definitions, but I'm only exploring
 23 with the witness the actual definitions. They may have
 24 their faults, but those are the definitions.
 25 SIR JOHN SAUNDERS: Right.

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1 MR HORWELL: In terms of other scene commanders, Inspector
 2 Michael Smith, a highly competent and experienced
 3 inspector; yes?
 4 A. Yes, I had worked with him, I was aware of him
 5 previously, yes.
 6 Q. He was the Bronze commander for the City Room and the
 7 station?
 8 A. Yes.
 9 Q. Mainly the City Room. And in terms of the outer area,
 10 we saw this morning a reference on your dictaphone
 11 transcript to the inspector for A Division and that
 12 wasn't a reference to Smith, it was a reference to the
 13 inspector you told us, who came to take command of the
 14 outer area.
 15 A. That's how I --
 16 Q. And that was Lee Cooklynn?
 17 A. Yes.
 18 Q. If it was GMP's practice, as you've told us, for Silver
 19 to be based at force headquarters, that is where you
 20 would have expected Silver to be?
 21 A. I wasn't surprised that Superintendent Nawaz would be at
 22 force headquarters. I think there is very much
 23 a distinction here that if this incident had happened
 24 during the day when you have senior leadership team on
 25 each area, I would expect a Silver, almost a local

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1 Silver, to go to the scene and then the force Silver
 2 would go to the force command module. But no, I'm not
 3 surprised that Superintendent Nawaz went to the force
 4 Silver control.
 5 Q. If you had thought or been told that there was a command
 6 vacuum at the scene, you would have done something about
 7 that?
 8 A. Yes, I would hope so.
 9 MR HORWELL: Those are my questions. Thank you.
 10 SIR JOHN SAUNDERS: Thank you very much.
 11 MR GREANEY: Thank you, Mr Horwell.
 12 Next, Mr Smith on behalf of North West Fire Control.
 13 Questions from MR SMITH
 14 MR SMITH: Chief inspector, when you drafted the
 15 aide-memoire, did you recognise the importance of
 16 ensuring early situational awareness for the other
 17 responder agencies?
 18 A. Yes.
 19 Q. Because one of the aspects of the aide-memoire, is this
 20 correct, is that learnings from Operation
 21 Winchester Accord were built into the document?
 22 A. Yes.
 23 Q. The second bullet point -- I hope I don't need to have
 24 it put on the screen, but please would you say if you'd
 25 like to have your memory refreshed with it. I will read

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1 the second bullet point to you, if I may.
 2 A. Yes, go on.
 3 Q. "The priority is to save life. Initially, this will be
 4 done by getting ARVs to the scene and mobilising the
 5 second and third waves. Then we can start to look to
 6 mobilise the fire and HART, duty CTU."
 7 A. Yes.
 8 Q. Is that the sequence of events that you envisaged would
 9 be necessary in the situation you were facing that
 10 night?
 11 A. I think it'd be fair to say that if these circumstances
 12 were slightly different, yes, that would have been the
 13 approach that I would have taken and would expect to
 14 have taken. Not necessarily in that order, because
 15 it would be a reaction to how an incident was
 16 developing, but I think it'd be fair to say that that
 17 would be a fair point.
 18 Q. So from your point of view, did the Fire and Rescue
 19 Service therefore have a very important role to play in
 20 supporting the treatment and movement of casualties?
 21 A. Yes, they would have.
 22 Q. Did you consider during the course of the incident and
 23 your management of it at any time contacting the duty
 24 GMFRS NILO?
 25 A. For the reasons I've given, it was never going to be top

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1 of my list. I do recall Andy Berry making the phone
 2 call and I can remember that, but because of what I was
 3 doing at the time, I wasn't in a position to speak to
 4 him. But no, I never made an attempt to contact him.
 5 Q. Don't you think you should have done?
 6 A. Under normal circumstances, under different
 7 circumstances I should say, then yes, absolutely. We
 8 did have and do have an understanding or a good working
 9 relationship that we could contact each other at any
 10 point, even if it was just for advice. So there was
 11 a very good working relationship there and under
 12 different circumstances -- in fact, when I was writing
 13 the aide-memoire, I really couldn't envisage a situation
 14 where I wouldn't have contacted him.
 15 Q. So what was the reason why you didn't contact him?
 16 A. I think I've gone through my reasons with my evidence of
 17 the last 2 days as to the reasons why I didn't feel it
 18 necessary to speak with GMFRS. As far as not speaking
 19 directly to the NILO, I believed -- in fact, I know that
 20 I had more pressing and immediate decisions to make and
 21 that was taking up the majority of my time. However,
 22 having said that, I think I've made it clear that
 23 certainly in the early stages I had no desire to speak
 24 to the Fire Service for the reasons I've given.
 25 Q. Can we just break this down a minute? The fact that you

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1 had no pressing and immediate reason to speak to the
 2 duty GMFRS NILO first of all. Did that situation exist
 3 throughout these events?
 4 A. I would say certainly within the first hour, hour and
 5 15, yes.
 6 Q. Is that because you were fully occupied managing the
 7 resources that you were having to deploy on the ground?
 8 A. I think it's twofold. I think that is part of the
 9 reason, and the other reason was the ongoing, as I saw
 10 it, ongoing threat that we were dealing with.
 11 Q. Was your decision not to contact Mr Berry in any way
 12 connected with your decision not to communicate the
 13 declaration of Operation Plato?
 14 A. Yes.
 15 SIR JOHN SAUNDERS: As I understand it, it had everything to
 16 do with it?
 17 A. Yes.
 18 MR SMITH: I would like you to explain this in a little more
 19 detail if you would: how was Fire and Rescue Service
 20 support to the Ambulance Service to be achieved if the
 21 Fire and Rescue Service duty NILO wasn't able to obtain
 22 accurate information from the force duty officer? Just
 23 how was that going to be achieved?
 24 A. As I've already said in my evidence, I didn't want to
 25 increase unarmed responders or the number of unarmed

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1 responders into that location. So I didn't have an
 2 intention for the Fire Service, certainly in the early
 3 stages of the incident, for them to provide that
 4 support. Rightly or wrongly, that's a decision for the
 5 inquiry to come to.
 6 However, I was aware that I had unarmed police
 7 officers there, I had armed police officers there, there
 8 was BTP there, there was members of the public there.
 9 I believed by leaving them there, they would provide
 10 that almost void that the Fire Service, albeit they
 11 would have been in a position to perform medical
 12 treatment -- yes, I understand that. But I had to weigh
 13 that up against the risk that I believed I would have
 14 been putting them in.
 15 Q. Did you appreciate that the Fire Service would have
 16 stretchers with them?
 17 A. Yes, I'm aware that they have access to stretchers.
 18 Q. (Overspeaking) ones?
 19 A. Yes.
 20 Q. That they would have medical training?
 21 A. Yes.
 22 Q. That they could support the ambulance resource that was
 23 at the scene?
 24 A. Yes.
 25 Q. That they could assist with the evacuation of

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1 casualties?
 2 A. Yes.
 3 Q. And that they could, if necessary, be kept stood by
 4 until it was safe for them to enter?
 5 A. Which I think I did by suggesting that they RVP at
 6 Boddington's until we were in a position to utilise
 7 them.
 8 Q. Well, I'll come back to that, if I may, in due course.
 9 I'm sorry if I cut across you just now. Did you want to
 10 say something else?
 11 A. It was just, yes, my expectation would have been that
 12 there would have been some representative from GMFRS,
 13 even if it was a singular person, whether it was the
 14 NILO or someone else, going to the scene. If they were
 15 struggling to obtain full situational awareness, the
 16 commonsense approach would have been to go down to the
 17 scene to try and gain it -- and I'm not talking about
 18 sending, deploying fire and rescue units, but
 19 a commonsense approach would have been to have some
 20 representation going towards the scene to gain better
 21 awareness, in my opinion.
 22 Q. What do you think, whoever that representative was,
 23 might have been told about Operation Plato when he got
 24 to the scene?
 25 A. I don't think they would have been told about

1 Operation Plato unless they'd spoken to a firearms
 2 officer.
 3 Q. Well, indeed. Did that cross your mind?
 4 A. No.
 5 SIR JOHN SAUNDERS: Mr Smith, do you mind if I just ask one
 6 question in between yours?
 7 MR SMITH: Of course, sir.
 8 SIR JOHN SAUNDERS: Some of the firefighters wanted to go
 9 direct to the scene, they didn't want to hang back, they
 10 just wanted to get there and they were frustrated they
 11 weren't getting there. And in certain circumstances,
 12 maybe if a different card had been used to direct
 13 people, they would have gone straight there. So a whole
 14 load of fire engines would have turned up without any
 15 control or direction from you at all.
 16 A. Yes.
 17 SIR JOHN SAUNDERS: How was that going to help?
 18 A. I wouldn't have had any control over that, sir.
 19 SIR JOHN SAUNDERS: Did that occur to you when you were
 20 thinking through all these possibilities?
 21 A. I knew that I couldn't control the deployment of
 22 resources on the ground, unarmed resources, to that
 23 location. But as I said yesterday, sir, I didn't want
 24 a decision that I made -- if they had got there and they
 25 knew it was Plato and that had been fed back to their

1 commanders, I'm sure that they would have been told to
 2 withdraw. But I honestly can't say I gave it that much
 3 consideration.
 4 SIR JOHN SAUNDERS: Okay. Thank you, Mr Smith.
 5 MR SMITH: Just following up on the chairman's point, you
 6 knew, didn't you, that the fire crews were in a holding
 7 position at Philips Park Fire Station?
 8 A. Yes.
 9 Q. Did it cross your mind that without any communication
 10 with the Fire Service NILO, at any time those crews
 11 could have been deployed by the Fire Service to the
 12 incident?
 13 A. Yes, they could have, they could have. I don't think,
 14 again, I gave it that much thought. I believe that
 15 it would be possible, as I say, I've already said, that
 16 if a commander or certainly a representative from the
 17 Fire Service had gone to the scene having struggled to
 18 speak to me, and I believe a number of attempts were
 19 made, then that is the next best way to make contact or
 20 to get an understanding of what's going on. And yes,
 21 going back to your original question, they could have
 22 been deployed. If they were deployed, you know what,
 23 I would have had to live with that, there's not much
 24 I could have done about it other than fully declare an
 25 Op Plato to all partners and risk the withdrawal of the

1 treatment that the injured were receiving at the scene.
 2 SIR JOHN SAUNDERS: So you were knowing that they may deploy
 3 to a scene which may present them with dangers?
 4 A. Yes. I've already got unarmed staff who I'm leaving in
 5 a scene and again, as I said, that was the worst or one
 6 of the most difficult decisions I made, knowing that
 7 there was a threat there and whether that was from
 8 a secondary device or from a shooter, I was taking
 9 a risk in doing it, but again I stand by that decision
 10 to say that it was the right decision in my mind to
 11 preserve life. But yes, I'm fully aware that they could
 12 have deployed again.
 13 SIR JOHN SAUNDERS: Thank you.
 14 MR SMITH: And you would have had no control over that
 15 deployment, would you?
 16 A. Very little.
 17 Q. Well, at any moment Greater Manchester Fire and Rescue
 18 Service, do you agree, from their holding position at
 19 Philips Park may have received instructions from the
 20 duty NILO or the control room to go direct to the
 21 incident?
 22 A. Yes.
 23 Q. And they'd have been there within 4 minutes on blue
 24 lights?
 25 A. Yes.

1 Q. That's the evidence. Well, what were you going to
 2 achieve by not communicating with the Fire Service then?
 3 A. By not communicating with the Fire Service, I would have
 4 had to tell the NILO that I had declared Op Plato.
 5 I couldn't stop that -- it was already out there that
 6 I'd declared Op Plato and it was trying to manage the
 7 transmission of that notification or reduce the
 8 transmission of that notification to other services. So
 9 by telling the NILO, I would have had to have fully
 10 briefed them, I couldn't have --
 11 SIR JOHN SAUNDERS: Okay, but there are no firemen in the
 12 City Room, so they wouldn't have had to come out --
 13 A. No, they're not, you're right, sir.
 14 SIR JOHN SAUNDERS: So you could just tell them,
 15 "Operation Plato, don't go in", to the Fire Service and
 16 you would have achieved what you wanted and they would
 17 at least know what was going on.
 18 A. That's not what I was thinking on the night, sir. What
 19 I was thinking on the night was if I did tell NILO, then
 20 there was a good possibility that was going to get back
 21 anyway to NWS Control, who in turn would have told
 22 their commanders on the ground, who in turn may have
 23 withdrawn their resources.
 24 SIR JOHN SAUNDERS: Okay, thank you.
 25 MR SMITH: Can I be clear about your last answer, please.

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1 Are you saying therefore that you made a conscious
 2 decision that if you told the Fire Service NILO that
 3 Operation Plato had been declared, he might communicate
 4 that to the Ambulance Service and they might then
 5 withdraw their staff? Is that what you're saying?
 6 A. Yes.
 7 Q. Is that really, really the position, Mr Sexton?
 8 A. Yes, very much so.
 9 Q. The declaration of Operation Plato was recorded on the
 10 GMP incident log at 22.48.01. It has been on the
 11 screen, it's page 15, but you're probably familiar with
 12 it, are you?
 13 A. I am, yes.
 14 Q. That page does contain some details about casualties, so
 15 I'd prefer not to put it on the screen if we could avoid
 16 doing so.
 17 Was your evidence that Mr Randall had caused that to
 18 be placed on the incident log?
 19 A. No, I think I caused it. I can't remember if I asked
 20 him to put it on. But the normal way that the FDO and
 21 the FDS work together is at times of significant demand,
 22 as decisions are being made and certainly key decisions,
 23 then there's an expectation that the log would be
 24 updated. I can't remember whether I asked him to do it
 25 or whether or not he did it out of experience, but it's

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1 what I would have expected him to have done.
 2 Q. Well, it reads:
 3 "FDO -- declared Op Plato."
 4 A. Yes.
 5 Q. You have seen that entry, haven't you?
 6 A. Yes.
 7 Q. When you decided that Operation Plato should be
 8 declared, how is that physically done in the operational
 9 control room? Was there a verbal communication by you
 10 and, if so, to whom, or was it in some way conveyed
 11 through a system? Could you just explain that to us,
 12 please?
 13 A. Yes, the declaration of Plato, what should have
 14 happened -- the FWIN did get updated, which is accurate.
 15 At some point the rationale for declaration Op Plato
 16 could have been put on that FWIN so that it was
 17 available to the radio operators who could then pass on
 18 the information to the unarmed resources at the scene.
 19 But it's predominantly within the control room around
 20 the ITFC and the management of that firearms incident.
 21 So it almost takes it away from the OCB, from the
 22 control room, I should say, and it very much then falls
 23 within the firearms world.
 24 Q. Mr Randall would know; is that correct?
 25 A. I would think so.

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1 Q. Mr Core would know?
 2 A. I would think so, yes.
 3 Q. Mr Myerscough, who was sitting just in front of you,
 4 would he know?
 5 A. If he had been briefed properly, then yes. If he didn't
 6 know, then that is something that was lost on him
 7 because of my inability to fully brief him because of
 8 the pressures that I was under.
 9 Q. But once it was placed on to the incident log,
 10 am I correct that any control room operator looking at
 11 the log would be able to read that entry?
 12 A. Yes.
 13 Q. Are you aware that at the same time as that entry was
 14 recorded on the incident log, a control room operator
 15 in the operational control room at GMP was speaking to
 16 North West Fire Control in a call which had been made to
 17 Fire Control, which began at 22.32? It was initially
 18 unconnected with the incident, but during the course of
 19 that call, at 22.34.44, the GMP control room operator
 20 told the Fire Control room operator of the fact of an
 21 explosion, and at 22.35.50, that it was a bomb that had
 22 exploded.
 23 That call remained in progress until 23.01. I have
 24 a series of questions that I want to ask you, please,
 25 about this issue. First of all, was there any

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1 operational reason why the control room operator at GMP
 2 during the course of that call should not have passed to
 3 North West Fire Control the fact that Operation Plato
 4 had been declared, it having been recorded on the log?
 5 A. There is a simple answer to that in that that operator
 6 would have had to be on the right page to look at it.
 7 I'm unaware of the call that you're talking about and
 8 unaware of what entries were put on to the FWIN, but if
 9 the operator was updating the FWIN with the conversation
 10 that she was having or they were having with
 11 Fire Control, then it is extremely — it would have been
 12 extremely difficult for her or for them to have
 13 potentially picked up on every entry prior to that, if
 14 that makes sense.
 15 Q. My question is, first of all, was there any operational
 16 reason why that information should not have been passed
 17 to North West Fire Control on the assumption that it was
 18 read on the log by the control room operator at GMP?
 19 A. No.
 20 Q. Did you listen to and watch the evidence of
 21 Inspector Booth?
 22 A. Yes.
 23 Q. Did you note in his evidence that he agreed that there
 24 was no operational reason why that information should
 25 not have been passed to North West Fire Control?

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1 A. Yes.
 2 Q. Did you agree with his evidence?
 3 A. I agree. I'm glad it wasn't passed, but there is no
 4 operational reason why it shouldn't or couldn't have
 5 been passed.
 6 Q. Do you agree with his evidence, presumably not, that it
 7 should have been passed?
 8 A. No. Let me... As a radio operator, yes, it should have
 9 been passed if that radio operator, as they were, were
 10 unaware of my desire not to communicate it. So because
 11 it was on the FWIN, then yes, the radio operator could
 12 have passed it and potentially should have passed it,
 13 yes.
 14 Q. Did you appreciate at the time that unless an
 15 instruction went out that this was information that was
 16 not to be passed, there was a real likelihood that any
 17 control room operator at GMP reading the log would have
 18 passed to the other agencies the fact that
 19 Operation Plato had been declared?
 20 A. Yes, I think I covered that yesterday in my evidence to
 21 say that once it was on the FWIN, there was nothing
 22 I could do about that. I couldn't stop it being
 23 communicated.
 24 Q. Was any instruction given to Mr Randall or to Mr Core
 25 that Operation Plato, or the fact that it had been

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1 declared, shouldn't be communicated to other agencies?
 2 A. No, I don't believe there was.
 3 Q. When you were speaking to other senior officers in the
 4 course of the incident, for example let's take
 5 Chief Inspector Buckle, did you tell Chief Inspector
 6 Buckle, for example, that you had decided to conceal the
 7 fact that Plato had been declared from the other
 8 agencies?
 9 A. No.
 10 Q. Did you tell anybody that night that you had decided to
 11 conceal the fact that Operation Plato had been declared
 12 from the other agencies?
 13 A. No, and as I said yesterday, it was because it was such
 14 a deviation away from policy that, really, I wanted to
 15 keep it to myself.
 16 SIR JOHN SAUNDERS: Okay. It's a heck of a responsibility
 17 and you are doing it for absolutely the right reasons,
 18 to save life.
 19 A. Yes.
 20 SIR JOHN SAUNDERS: That was the best way to save life.
 21 Couldn't you have had a discussion with Gold, a very
 22 senior officer, and said, "Look, I'm doing this, I'm
 23 doing it because it's my Article 2 requirement. What do
 24 you think? Will you back me? Is it the right thing?"
 25 A. Absolutely, sir. That's what should have happened.

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1 Gold should not have been in a position where I was
 2 making decisions which she may have disagreed with,
 3 absolutely. On the night, it was so busy and I think
 4 you get that from the audio recording. I didn't even
 5 have an opportunity, having deployed firearms, to speak
 6 personally to Gold, who's the SFC, which is unheard of.
 7 That conversation should take place at the earliest
 8 opportunity so that she is in a position to ratify it.
 9 But I was aware that Chief Inspector Buckle was
 10 a Silver and would be liaising with Superintendent Nawaz
 11 and also ACC Ford, so I believed that they would have
 12 had sufficient awareness of what I was dealing with, but
 13 ultimately, you're right, that decision should have been
 14 ratified at a higher level, I think. But it was my
 15 decision and it stands with no one else.
 16 SIR JOHN SAUNDERS: Yes, but so difficult, so finely
 17 balanced, that actually just talking to somebody else,
 18 getting their authority, just so they can think through
 19 the other angles?
 20 A. I don't believe I had the capacity and the time to have
 21 those detailed conversations.
 22 SIR JOHN SAUNDERS: And you couldn't make the time?
 23 A. Absolutely not.
 24 SIR JOHN SAUNDERS: Okay. Mr Smith, I'm sorry, I keep
 25 interrupting you.

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1 MR SMITH: No, not at all, sir.
 2 Did it cross your mind at any time, chief inspector,
 3 that, for example, senior officers on the ground might
 4 want to know where the Fire Service was?
 5 A. Yes, and they would have asked me the question if that
 6 was the case.
 7 Q. And don't you think it would have been sensible, if this
 8 is correct that you made a conscious decision that you
 9 would not pass this information to the other agencies,
 10 wouldn't it have been sensible to have shared that
 11 at the very least with, for example,
 12 Superintendent Nawaz?
 13 A. Yes. However, Superintendent Nawaz is not within the
 14 firearms world and may not have understood the full
 15 rationale for what I was doing. But going back to your
 16 suggestion that the commanders on the ground --
 17 obviously for that awareness, and in relation to the
 18 need for Fire Service to be there, I did believe that
 19 there would have been a representative from the Fire
 20 Service, even in singular, at the scene at some point
 21 and somewhere to gain that situational awareness.
 22 Q. Well, do you agree, just listening to the dictaphone
 23 recording, that the declaration of Operation Plato was
 24 recited on numerous occasions over the airwaves, by
 25 telephone, and in conversation generally?

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1 A. Yes, certainly over the air, but purely on the firearms
 2 channel. And yes, it was mentioned on numerous
 3 occasions to commanders and people that I thought would
 4 need to know about it. I didn't believe that they would
 5 have a full understanding of what Plato was. Not
 6 everyone. But yes, you're right it was mentioned
 7 numerous times.
 8 Q. To utilise Mr Greaney's term therefore, how could you
 9 expect the declaration of Operation Plato to be kept
 10 a secret from the other responder agencies in these
 11 circumstances?
 12 A. I refer back to my previous answer in relation to --
 13 I didn't want a deliberate decision that I'd made, which
 14 is so fundamentally different from what guidance says,
 15 to affect the response that I knew the victims were
 16 getting on the ground. What you have to remember as
 17 well, which I don't think we have mentioned, I think is
 18 worth mentioning, that Op Plato, JESIP, everything to do
 19 with the incident are all policy or guidance.
 20 But the APP for armed policing makes it quite clear,
 21 as it runs through the whole document itself, that those
 22 could be classed as lawful orders and they should be
 23 followed. However, if a lawful order breaches
 24 Article 2, then you don't follow it and Article 2 will
 25 always take precedence. And that, rightly or wrongly,

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1 is what was always at the forefront of my mind.
 2 There will be parts of the night which could have
 3 been dealt with better by me. I think that under the
 4 circumstances the best was achieved and mistakes were
 5 made and I think certain mistakes were that I was
 6 conflicted in the declaration of Op Plato, as in
 7 declaring it to partners.
 8 Q. Before I move on, I just want to deal with this,
 9 Mr Sexton, please. We've looked at part of the
 10 transcript of the dictaphone recording that relates to
 11 North West Ambulance Service personnel being deployed.
 12 But one of the things you said and which has been
 13 recorded, and this was at 22.54:
 14 "I'm trying to get as many NWS down there as
 15 possible."
 16 Do you remember saying that?
 17 A. Yes. Was that in response to --
 18 SIR JOHN SAUNDERS: I think you've been asked questions
 19 already by Mr Greaney about this.
 20 A. Yes, that was in response to a radio transmission from
 21 an officer at the scene.
 22 MR SMITH: My question to you is: why not the Fire Service?
 23 If the situation was that you were trying to get as many
 24 ambulance personnel down there as possible, why not the
 25 Fire Service?

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1 SIR JOHN SAUNDERS: I'm really sorry, Mr Smith, I'm going to
 2 stop you because the answer we got to the question about
 3 the Ambulance Fire Service was: I said that but in fact
 4 I didn't try.
 5 A. That's correct.
 6 SIR JOHN SAUNDERS: So although he said he was trying to, in
 7 fact he wasn't trying to, so your question has to be
 8 within that context.
 9 MR SMITH: Well, it forms the basis, sir, if I may, for
 10 a further question.
 11 SIR JOHN SAUNDERS: Please do, absolutely.
 12 MR SMITH: My question therefore is this: did you really
 13 have an understanding of the support capability that the
 14 Fire Service could provide to the Ambulance Service?
 15 A. Absolutely. I think if you ask Mr Berry the question
 16 whether or not he thinks I had a good understanding,
 17 I think our working relationship over the years prior to
 18 the incident would suggest that I did.
 19 Q. I will move on now, if I may.
 20 Can I take you to your statement, your first
 21 statement, which is paragraph 78, page 19. It reads:
 22 "I recall receiving a request at 23.39 from NWS to
 23 set up the interoperability channel. I was aware that
 24 setting up a joint channel with NWS and GMFRS was said
 25 to be best practice according to guidance, but having

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1 released staff to go to FHQ and set up the Silver room
 2 I simply did not have the immediate resources to enable
 3 this to be set up and staffed at that time. My focus
 4 was on managing the ongoing threat with a real
 5 possibility of further attacks. As such, I had no spare
 6 time to complete other less important tasks."

7 A short time ago you said in answer to Mr Horwell
 8 that one of the reasons why this was not done was
 9 because you did not wish the declaration of
 10 Operation Plato to become known among the other
 11 agencies; is that right?

12 A. Yes, in part.

13 Q. What is the explanation for the fact that a joint radio
 14 channel was not set up?

15 A. If we're looking at that time, I was aware that Silver
 16 would have been in the throes of being set up and, as
 17 I said earlier, the common or the usual use of
 18 a tri-service radio system would be within the Silver
 19 command suite. And as the Silver was pretty much set
 20 up, then I anticipated that that would be utilised at
 21 that point.

22 Q. Well, could I take you to the transcript of the
 23 dictaphone recording at {INQ024325/30}, please.

24 I'm looking at the very bottom of the page,
 25 Mr Lopez.

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1 Mr Myerscough asks:
 2 "Ambulance are asking can they have an inter ops
 3 channel with their control room."
 4 And your reply was:
 5 "They're going to need to -- we haven't got it set
 6 up yet so they're going to have to wait."
 7 Right?

8 A. Yes.

9 Q. That can be taken down, Mr Lopez.

10 Was this really, given your answer (inaudible:
 11 distorted), anything to do with your unwillingness for
 12 the other agencies to learn of Operation Plato?

13 A. Sorry, could you repeat that? I didn't fully
 14 understand.

15 Q. Was your unwillingness for the other agencies to learn
 16 of Operation Plato anything to do with the fact that
 17 a three-way communication channel could not be set up at
 18 that time? In other words, was your answer to
 19 Mr Horwell an accurate one, really?

20 A. Yes, it was accurate and it was part of the reason. The
 21 mechanism for setting up the tri-service radio would
 22 have taken additional resources to do so and, because of
 23 the timing, as I said, I was aware that Silver was
 24 setting up, plus it was the norm, or it was normal, for
 25 that tri-service to be used within a Silver control

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1 suite. I have no knowledge of previous major incidents
 2 where, as an FDO, we set up the tri-service radio. So
 3 it was part of the reason, yes.

4 Q. Could I take you to pages 37 and 38 of that document,
 5 please {INQ024325/37-38}. It may not be necessary to
 6 put it on the screen.

7 In the middle of page 37, Mr Myerscough said to you
 8 at just before 23.53 --

9 MR GREANEY: I'm sorry to interrupt you, we will need to
 10 have it on the screen if the witness is going to see it.

11 MR SMITH: Will you forgive me? I'm so sorry.

12 In that case, Mr Lopez, we're looking at
 13 {INQ024325/37}, the middle of the page.

14 Mr Myerscough said:

15 "We've got NILO on the phone."

16 Then there's a reference from Mr Core to the Fire
 17 Service at Central Park. Then over the page,
 18 {INQ024325/38}:

19 "Just spoke to NILO -- what's the forward command
 20 point?"

21 Then this passage that I acknowledge Mr Greaney has
 22 already asked you about:

23 "The forward command point is -- well, they
 24 shouldn't have a forward command -- oh, the Fire
 25 Service, if they go to the Boddington's, the old

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1 Boddington's car park, which is opposite the arena,
 2 they'll know where it is."

3 It's these words I want to ask you about:

4 "Just have them there for the time being, they don't
 5 need to go right to the scene."

6 The time of that conversation was about 23.54.

7 Could you explain to the inquiry, please, Mr Sexton, why
 8 it was your view at that time that it wasn't necessary
 9 for the Fire Service to go to the scene, right to the
 10 scene?

11 A. At that time, we're an hour and 20 minutes, 25 minutes,
 12 after the original incident. It didn't make any sense
 13 whatsoever to start causing a traffic situation on what
 14 we'd call a blue route at the scene with fire engines.
 15 There had been no requests made to me for the fire to
 16 attend. So the obvious answer is to have them nearby
 17 should that request come in from the commanders on the
 18 scene that the Fire Service were required rather than
 19 causing a traffic situation directly at Victoria
 20 Station.

21 Q. Well, isn't it the case, Mr Sexton, that they needed to
 22 be at the scene?

23 A. You're asking me something that I can't comment on.
 24 I was not at the scene. If they had been needed at the
 25 scene, I would have expected the commander at the scene

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1 to have requested them and that request could have come
 2 to me or via, obviously, the control rooms. If they'd
 3 been needed at the scene, as I said, my expectation was
 4 that there would have been a representative from the
 5 Fire Service at the scene. That didn't happen and
 6 I wasn't aware of that.

7 SIR JOHN SAUNDERS: Mr Smith, could you help me and my
 8 memory? Is there any evidence that that message got
 9 through to go to Boddington's? It's not material to the
 10 questions you're asking; it's just for my benefit to
 11 know whether that did get through or whether any fire
 12 engine --

13 MR SMITH: No fire engine went to Boddington's, sir.

14 MR GREANEY: The position is that the message did get
 15 through to Mr Berry, but by that stage he had discovered
 16 that the ambulances were at Thompson Street and appears
 17 to have made the decision to locate there.

18 SIR JOHN SAUNDERS: Thank you. Thank you, both.

19 MR SMITH: Before I leave this particular topic -- and I've
 20 nearly completed my questions, Mr Sexton -- you knew,
 21 didn't you, at just after 11 o'clock that night, because
 22 you said so, that the priority was for the casualties at
 23 that time?

24 A. Yes.

25 Q. You knew, didn't you, that the Fire and Rescue Service

1 could provide support to the ambulance for that purpose?

2 A. Yes.

3 Q. Didn't you think on reflection that the advice that they
 4 didn't need to go right to the scene was flawed?

5 A. No.

6 Q. Would you set out your reasons?

7 A. For the reasons I've already given. The casualty aspect
 8 was just after 11 o'clock at night. The information and
 9 intelligence changed, as I've already stated, at just
 10 after 23.15, which put the threat and the risk back up
 11 in my assessment. And this request about Boddington's
 12 or the RVP came nearer to midnight. And as I've already
 13 said, if they had been needed at the scene, the
 14 commanders at the scene would have requested them.

15 Q. Just two matters now, please.

16 As far as Mr Myerscough is concerned, do you agree
 17 that the GMP operational control room had no one in
 18 place already trained and prepared to act as a person
 19 who was to answer the FDO's phone in circumstances such
 20 as these?

21 A. In circumstances such as these, I'd agree, because it is
 22 something that we -- it's highly unusual. However,
 23 would I have expected anyone in that room to be able to
 24 answer the phone and take a message or pass/relay
 25 messages on to me, then absolutely I would have expected

1 that to be the case.

2 Q. Well, what you said was -- and I just say this for
 3 reference purposes -- at page 7 of the transcript:
 4 "I want one of you down there to come up here,
 5 please, to answer my phone for me -- someone from IMU,
 6 please."

7 A. Yes.

8 Q. Do you agree that GMP was completely unprepared for the
 9 task of providing and putting in place someone who could
 10 discharge that function?

11 A. No, I don't agree.

12 Q. And therefore, finally this, please. Would it be more
 13 accurate evidence to the inquiry to say that you were
 14 simply overwhelmed by the sheer volume of demands on
 15 your time that Greater Manchester Fire and Rescue
 16 Service and the Fire Control room were simply overlooked
 17 by you in the course of this incident?

18 A. No, that's not correct. As I've already said, there
 19 were decisions I've made and I've obviously covered
 20 those. So it wasn't a case of they were overlooked.
 21 Yes, I was seriously overburdened to an extent with the
 22 two conflicting roles of ITFC and FDO, which put
 23 significant pressure on my role, and I think that's
 24 a given. But to suggest that I didn't consider the Fire
 25 Service or even NWS is inaccurate because of the

1 regular contact for the smallest of jobs that I would
 2 certainly have with the NILO.

3 Q. Mr Sexton, out of respect for your position, can I just
 4 say this, that none of the questions I have asked are
 5 intended in any way to diminish any recognition of the
 6 pressures that you were under that night.

7 A. Thank you.

8 MR SMITH: Thank you very much.

9 SIR JOHN SAUNDERS: Thank you, Mr Smith. I'm sure everyone
 10 agrees with that. I think we're going to have a break.

11 You've been answering questions for a very long
 12 time. However capable and competent you are, that is
 13 a stressful occasion for anybody. We sat late
 14 yesterday. If we are going to finish your evidence,
 15 we're certainly going to be finishing late today.
 16 I give you the option of when we finish because it's
 17 important that you feel in a proper position to answer
 18 the questions, and if you wish to discuss that with your
 19 counsel during the break, then by all means do that.
 20 No one will hold it against you if you say, "I've had
 21 enough", because it is stressful and I understand that.
 22 So you think about that.

23 This is something you can think about for the future
 24 and you can tell me when you like. You are one of the
 25 very few people to have actually put Operation Plato

1 into operation. There was one before you, I understand,
 2 and whether there's been any after you, I do not know.
 3 So you have a practically unique experience about
 4 Operation Plato. You have obviously had concerns about
 5 it and the way it operated in practice, and indeed, as
 6 I understand it, some changes have now been made to the
 7 procedure as a result of the problems that you had.
 8 I want you to think about it and tell me: is the way
 9 it is now meant to operate fit for purpose or are there
 10 other improvements that can be made? So I will leave
 11 you to think about that and you can either do it in
 12 writing at a later stage or you can tell me later on.
 13 MR COOPER: Sir, you have raised a matter which I have been
 14 in discussion with Mr Greaney -- fairly helpful and, as
 15 always, constructive discussion -- over the last
 16 24 hours. It concerns the references that this witness
 17 has made to new Plato, if I can put it that way.
 18 We haven't had it, as you probably realise, and we know
 19 nothing of it and it puts us in some difficulty (a) in
 20 asking questions and, in due course, in making any
 21 submissions to you about what needs to be changed
 22 because we don't know what's been changed. I would have
 23 wanted to have asked witnesses questions about this
 24 document, even if it's in restricted session.
 25 At one stage during my discussions with Mr Greaney,

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1 it was considered maybe it's another witness that should
 2 be asked those questions. But given, in my submission,
 3 the sensible question that you have just put to this
 4 witness, it is our submission that we should be able to
 5 ask this witness questions in restricted session based
 6 upon a document we haven't yet seen.
 7 SIR JOHN SAUNDERS: Okay. Let's go down the line and I'll
 8 hear argument about whether or not, and the witness
 9 should be allowed to answer my question, even if it's
 10 a restricted answer, and then we'll discuss how far it
 11 can be actually circulated, if at all. I will then
 12 decide whether I need further questions about it or not,
 13 if you don't mind leaving that to me.
 14 MR COOPER: Of course.
 15 SIR JOHN SAUNDERS: Then we will see what can be circulated
 16 and I'll obviously hear argument about whether things
 17 should be restricted.
 18 MR COOPER: I'm grateful.
 19 MR GREANEY: Sir, I was simply going to say that we have
 20 little doubt that at some stage you will want to
 21 consider whether, if the evidence has revealed
 22 deficiencies in Plato 2017, Plato 2020 has cured those
 23 problems. So can I reassure Mr Cooper that, one way or
 24 another, we have a commitment to ensuring that that is
 25 dealt with.

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1 SIR JOHN SAUNDERS: Thank you. Obviously, a lot of other
 2 agencies will need to be involved in discussion about
 3 how that is done.
 4 MR GREANEY: Of course. It is not going to be
 5 straightforward, but we need to seek to achieve it.
 6 Secondly, can I say, really so the witness knows,
 7 I do not have a high degree of confidence that even
 8 sitting late will enable the witness's evidence to
 9 conclude today.
 10 SIR JOHN SAUNDERS: Okay. You speak to Mr Davies, if you
 11 like, just to discuss, but be realistic about it.
 12 Thank you.
 13 Ten minutes. Is that enough for you?
 14 A. Yes, sir.
 15 (3.31 pm)
 16 (A short break)
 17 (3.48 pm)
 18 MR DAVIES: Sir, thank you for the time. May I invite you,
 19 and it's my assessment of the witness's capability, to
 20 sit up to but no later than 4.30 today?
 21 SIR JOHN SAUNDERS: Okay.
 22 MR GREANEY: Thank you very much indeed.
 23 Could we indicate that it is still the plan to call
 24 two additional witnesses tomorrow: Mr Randall, the first
 25 FDS, and Mr Core, the second FDS, because having

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1 listened to the recording we are now well aware,
 2 particularly you are well aware, of their contribution
 3 on the night. We would expect them to be short
 4 witnesses and we invite everyone to bear in mind that
 5 assessment of ours when they plan their questioning
 6 tomorrow.
 7 SIR JOHN SAUNDERS: Does anybody assess them as being long
 8 witnesses at the moment? No? Thank you. Although I am
 9 obviously prepared to sit late on certain days, on
 10 Friday, with what for us is a short weekend, I'm not
 11 that prepared to sit late, if people will forgive me for
 12 that.
 13 MR GREANEY: Well, I'm delighted to hear you say that, sir.
 14 Next, I'm not sure whether it's Ms Johnson or
 15 Mr Warnock to ask questions on behalf of GMCA.
 16 Questions from MR WARNOCK
 17 MR WARNOCK: Chief inspector, you've given the reasons for
 18 the decisions that you made, including departures from
 19 policy. What I want to focus on is what your knowledge
 20 and understanding was of what others would have been
 21 expecting to occur in the light of those policies,
 22 particularly the NILO in GMFRS. Do you understand?
 23 A. Yes.
 24 Q. Could I invite you in that regard to look, firstly, at
 25 the JOPs edition 3.

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1 Mr Lopez, that's {INQ008372/11}, please.
 2 Really, all I want to ask you about first,
 3 chief inspector, is paragraph 4.5 towards the bottom of
 4 that page, where it says:
 5 "The police control room will, as a matter of
 6 priority, liaise with ambulance and FRS control room
 7 managers to jointly agree a rendezvous point for the
 8 initial response."
 9 Under GMP procedures, it was the responsibility of
 10 the force duty officer to undertake that liaison;
 11 is that right?
 12 A. Yes.
 13 Q. Mr Lopez, you can take the document down, thank you.
 14 Under GMFRS policies, as you, I think, were aware,
 15 that liaison would be undertaken by the NILO?
 16 A. Yes.
 17 Q. Do you agree that the expectation under JOPs was that,
 18 firstly, therefore there would be liaison between you
 19 and the NILO?
 20 A. Yes.
 21 Q. And secondly, that that would lead to an agreed RVP?
 22 A. Yes.
 23 Q. If the NILO had simply been given an RVP without
 24 discussion or agreement and about which he had concerns,
 25 it would be reasonable for him, would it not, in

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1 accordance with the policy, to expect to be able to
 2 speak to you about them?
 3 A. Yes.
 4 Q. So that before deploying unarmed personnel to that
 5 location, he could confirm, firstly, that it was
 6 actually a declared RVP?
 7 A. Yes.
 8 Q. And secondly, that it was in fact a safe and appropriate
 9 location for an RVP?
 10 A. Yes.
 11 Q. Could I ask next that you be taken to the Greater
 12 Manchester Police major incident plan. This is the
 13 March 2017 version.
 14 Mr Lopez, it's {INQ007279/1}.
 15 Firstly, chief inspector, I'm sure you would agree
 16 that the arena bombing was indeed a major incident, was
 17 it not?
 18 A. Most definitely, yes.
 19 Q. If we could go to {INQ007279/35} of that document,
 20 Mr Lopez.
 21 There's a section in relation to the rendezvous
 22 point at paragraph 3.3.2, if that could be enlarged,
 23 please. If I could ask you to look, please, at the
 24 bottom paragraph of that section, which says:
 25 "The location of an RVP should be secure and safe

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1 for emergency service personnel to use and it should be
 2 searched prior to use."
 3 You have told us that you were aware that
 4 Inspector Smith had chosen the Cathedral car park as
 5 a rendezvous point. You picked that up from the log,
 6 I think.
 7 A. Yes.
 8 Q. Do you know if it had been searched or did you know
 9 at the time whether it had been searched?
 10 A. I didn't.
 11 Q. Going back to that document at the same page, page 35
 12 again, {INQ007279/35}, the first paragraph under 3.3.2,
 13 it says:
 14 "The rendezvous point is a location to which all
 15 police and emergency services personnel attending an
 16 incident should be directed."
 17 And if you could just go on to the last sentence of
 18 that paragraph:
 19 "A designated RVP should be a location suitable for
 20 marshalling, briefing and deploying resources. An RVP
 21 manager should be appointed to coordinate the RVP and
 22 these resources."
 23 To your knowledge, was an RVP manager appointed
 24 at the Cathedral car park?
 25 A. I'm certainly unaware that one would have been appointed

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1 at that early stage.
 2 SIR JOHN SAUNDERS: You're unaware?
 3 A. Unaware.
 4 SIR JOHN SAUNDERS: Thank you.
 5 A. Could I just qualify that? Both that first paragraph,
 6 the sentence of the first paragraph and the last
 7 paragraph are again gold standard. It is impossible to
 8 achieve that in the very early stages of a developing
 9 incident.
 10 MR WARNOCK: Are you saying really the policy is
 11 unrealistic?
 12 A. In the first moments of an incident, yes, I believe so.
 13 It is not the way that we would potentially deploy. At
 14 some point, it of course should be searched and
 15 obviously if anybody becomes aware that there's a risk
 16 then that's where — it would be moved and I think to an
 17 extent that was what happened on the night.
 18 SIR JOHN SAUNDERS: I don't think anybody went there.
 19 A. No, that should have been the case though, sir.
 20 Practically speaking, in the first moments of setting up
 21 an RVP in a quick, developing major incident, as this
 22 was, neither of those, I would think, are going to get
 23 implemented in quick time.
 24 MR WARNOCK: Whose responsibility is it to appoint an RVP
 25 manager whenever it happens?

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1 A. I would suggest it would be down to — part of the
 2 Silver responsibilities . Whether or not that's
 3 an RVP — if it's a police—led major incident or
 4 an RVP — Fire Service—led or NWAS—led major incident,
 5 I think it 's a discussion between the three services as
 6 to who would take command.
 7 Q. But in an incident of this nature, which was clearly
 8 police—led, is that right?
 9 A. Yes.
 10 Q. So you're saying that it would have been Silver's
 11 responsibility to have appointed the RVP manager?
 12 A. I would think in consultation with Bronze, ground
 13 Bronze.
 14 Q. Right. When you say Silver, are you referring therefore
 15 to that would be a responsibility of
 16 Superintendent Nawaz or were you performing the Silver
 17 role?
 18 A. Either could be done, I suppose. Again, if it had just
 19 been a major incident and not the ongoing firearms
 20 threat, then it is something that I would most probably
 21 look at as an FDO in conjunction and consultation with
 22 the Bronze commander because it would no doubt initially
 23 be one of their resources that I'd be using.
 24 But practically speaking, because that would not be
 25 put in place immediately, it would be a decision,

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1 I would think, between unarmed Silver and Bronze on the
 2 ground. That's my interpretation.
 3 Q. Thank you. If we could just have page {INQ007279/35} up
 4 again, Mr Lopez, at the same section.
 5 3.3.2 and looking now at the bottom paragraph:
 6 "The location should be secure and safe for
 7 emergency services personnel to use and it should be
 8 searched prior to use. If an RVP is being established
 9 in response to a suspected terrorist incident, it is
 10 preferable that it is not in an obvious, predetermined
 11 location."
 12 In relation to that, presumably the reason, the
 13 obvious reason, for not having an obvious predetermined
 14 location is the risk that terrorists may be seeking to
 15 draw in emergency responders to attack them; is that
 16 a fair assumption?
 17 A. Yes, it is.
 18 Q. Did you give any consideration as to whether the
 19 Cathedral car park was an obvious predetermined location
 20 or was it something you just didn't think about?
 21 A. It was the best location at the time in its proximity to
 22 Victoria and the arena. So yes, I did give it
 23 consideration and, as far as I am aware, it is not
 24 a predetermined location.
 25 Q. Is it an obvious location?

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1 A. I think there are a number of obvious locations around
 2 that location, Boddington's Brewery car park being one
 3 of them, and the issue with a rendezvous point, it has
 4 to be large enough to potentially house significant
 5 numbers of vehicles and personnel. So to an extent,
 6 in the city centre, you do become limited.
 7 Q. It's quite close, as you said, to Victoria Station and
 8 the arena.
 9 A. I would say it's not overly close to it, I would say
 10 it is a reasonable distance and an acceptable location.
 11 Q. Looking at your evidence as a whole, you have told us
 12 you did not want to bring GMFRS personnel to the scene;
 13 that's right, isn't it?
 14 A. Yes.
 15 Q. And you've also told us that that was one of a number of
 16 really very difficult decisions you had to make on the
 17 night, and we well understand the difficulty of the
 18 decisions you had to make.
 19 A. Yes.
 20 Q. But was this particular decision not something really
 21 that, as you reflect on it, that you should have
 22 discussed with GMFRS?
 23 A. Sorry, which decision? Decision for the rendezvous
 24 point?
 25 Q. The decision that you didn't want to bring GMFRS

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1 personnel to the scene.
 2 A. No, and I think I've given my answer earlier this
 3 afternoon in relation to why, and yesterday, about
 4 trying to keep the communication of that down to
 5 a minimum as in I would have had to tell them about
 6 Plato.
 7 Q. Yes, but you're making what I think you say is a very
 8 difficult judgement call about whether to bring more
 9 people on to the scene. Wouldn't it have lightened the
 10 load of that decision to actually have discussed it with
 11 the NILO as the policies and procedures expected?
 12 A. Under different circumstances, absolutely, that would be
 13 the way to do it. However, the night was not about
 14 making my life easy, it was about doing the right thing,
 15 which I believe I did under Article 2.
 16 Q. Why not speak to the NILO and let the Fire and Rescue
 17 Service make its own judgement based on the situational
 18 awareness you would share with them about whether or not
 19 to deploy?
 20 A. Again, I can only refer to the fact that it was
 21 a fast—moving and quick decision that I had to make and
 22 I don't believe — that is almost saying to me, "Give
 23 someone else the responsibility to make that decision".
 24 Well, if I have the ability to potentially maintain
 25 a level of protection and continued treatment to people

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1 who have already been significantly injured, then that's
 2 what I'm going to do and that's what I did.
 3 Q. You gave some evidence this afternoon in answer to
 4 questions from Mr Smith where you said:
 5 "I did believe a representative of the Fire Service
 6 would be there."
 7 Do you remember saying that?
 8 A. Yes.
 9 Q. As far as I am aware, and you'll correct me or somebody
 10 else will correct me if I'm wrong, that's not something
 11 you've said before this afternoon, is it, in your
 12 evidence, that you believed a representative of the
 13 fire --
 14 A. I don't think it's come up as an opportunity to say that
 15 earlier in my evidence. Not in context.
 16 Q. Is it actually a belief that you held?
 17 A. Yes.
 18 SIR JOHN SAUNDERS: Mr Warnock, I hesitate to stop anybody,
 19 which I really haven't done very much, but I think we
 20 may have been round this particular circle quite a lot
 21 of times. I understand the points you're making and
 22 I've also got the answers.
 23 MR WARNOCK: Could I just ask the officer this: how does
 24 that belief fit with your desire that unarmed personnel
 25 shouldn't attend the scene?

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1 A. Sorry, can you rephrase the question, please?
 2 SIR JOHN SAUNDERS: It's me interrupting. He is talking
 3 about the fact that you expect a representative of the
 4 fire service to be there in any event. Is that right,
 5 Mr Warnock?
 6 MR WARNOCK: Yes.
 7 SIR JOHN SAUNDERS: How does that fit with your desire not
 8 to have them there at all?
 9 A. Again, as I said yesterday, I couldn't control the Fire
 10 Service or NNAS if they wished to deploy, to go to the
 11 scene. All I knew is that if they were aware of Plato,
 12 then it was highly likely that they would... It wasn't
 13 so much an issue for Fire Service for me, but NNAS would
 14 have potentially pulled out and unarmed officers should
 15 have pulled out of the scene as well. So that's how
 16 I justify it, that I couldn't control -- if NNAS went
 17 down to the scene and gained -- sorry, the Fire Service
 18 went down to the scene and gained situational awareness
 19 and became aware of Op Plato and then decided not to
 20 deploy, that's out of my control, I can't do anything
 21 about that. But I had some control over trying to keep
 22 it from them.
 23 MR WARNOCK: Would that not be a worse situation from the
 24 point of view of your reasoning, having somebody turn up
 25 in a non-structured way, with you having no control over

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1 it, than actually having a conversation with the NILO
 2 and coming to an agreed plan?
 3 A. No, I disagree. The gold standard would be exactly what
 4 you've suggested, absolutely, I accept that. But that
 5 was not -- that approach did not fit the circumstances
 6 on the night and therefore I disagree that that would
 7 have been a better approach. If an individual had
 8 turned up at the scene, then that individual from the
 9 Fire Service is going to be professional anyway, so
 10 I can't see them posing any issues for that, and if
 11 that's how they gained situational awareness and then
 12 made their own decisions based on that, then that is out
 13 of my control, but I had a degree of control over not
 14 informing them.
 15 MR WARNOCK: Chief inspector, that concludes the questions
 16 I wanted to ask you. Thank you very much.
 17 SIR JOHN SAUNDERS: Thank you, Mr Warnock.
 18 MR GREANEY: Sir, next, I'm going to ask Mr Weatherby if he
 19 can make a start on his questioning, please.
 20 SIR JOHN SAUNDERS: Thank you, Mr Weatherby. I will stop
 21 you at a convenient time around 4.30.
 22 Questions from MR WEATHERBY
 23 MR WEATHERBY: Thank you very much.
 24 Can you hear and see me, chief inspector?
 25 A. Yes, I can.

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1 Q. Thank you. Can I just start by noting that in asking my
 2 questions on behalf of the families, I don't lose sight
 3 of the fact that even though there was a background
 4 context of a severe threat of a terrorist attack, you
 5 were faced on that night with an attack and a major
 6 incident that came out of the blue, so it was always
 7 going to be extraordinarily difficult. So in asking my
 8 questions, I hope I don't lose sight of that, okay?
 9 A. Thank you.
 10 Q. And also, in asking my questions, I hope I don't lose
 11 sight of the fact that you were a very experienced GMP
 12 officer and force duty officer at the time. But you
 13 were an inspector and therefore had no firearms command
 14 training or experience other than in this rather niche
 15 initial TFC role that's right, isn't it?
 16 A. Yes, other than, as I said yesterday, as an unarmed
 17 Bronze in relation to firearms deployments when I was
 18 a response inspector, where I was controlling unarmed
 19 resources not firearms resources.
 20 Q. Yes. That's why I cast it as firearms command
 21 experience. In fact, you had no operational firearms
 22 experience, you were not an AFO or an OFC, for example,
 23 were you?
 24 A. No.
 25 Q. Of course, it's important we see your evidence through

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1 that lens as well. But the corollary of that is that
 2 you've described a major departure from the firearms
 3 policy in concealing the declaration of Plato from other
 4 agencies who were or should have been involved; yes?
 5 A. Yes.
 6 Q. And if it's correct that you did consciously depart from
 7 the policy in the way you described, whether that was
 8 right or wrong, it was wholly unacceptable that you did
 9 so without reference at any point to a senior firearms
 10 commander, wasn't it, right or wrong?
 11 A. I would say that, as I've already referenced, the APP
 12 for armed policing gives a degree of flexibility. I've
 13 already said it this afternoon in relation to powers,
 14 and policies and procedures can be overridden by
 15 Article 2. So in that aspect it was right.
 16 Q. Okay, well, we can perhaps come back to safeguarding
 17 life a little later.
 18 But this was a major departure from firearms policy.
 19 Given the gravity of that decision, you had no excuse
 20 for not going to a senior firearms commander to run it
 21 past them, discuss it with them, before you took that
 22 course, did you?
 23 A. I was the senior firearms commander on the night, so
 24 I wasn't going to run it past anyone. The
 25 responsibility stayed with me.

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1 Q. Okay. As at the time, you were the initial tactical
 2 firearms commander, of course. But within a few
 3 minutes, Chief Inspector Buckle, a cadre TFC, was
 4 informed and a discussion took place with her; yes?
 5 A. Yes, but not by me at that point.
 6 Q. Okay, but it was entirely open to you to contact
 7 Chief Inspector Buckle, the on-call cadre TFC, somebody
 8 with significantly more commander training than you had
 9 had and somebody who potentially was going to take over
 10 your role. What was to stop you calling her and saying,
 11 "This is what I think I should do, am I doing the right
 12 thing"?
 13 A. First of all, TFCs do not have significantly more
 14 experience in dealing with firearms incidents such as
 15 spontaneous ones. They have significantly more
 16 experience of dealing with pre-planned firearms
 17 operations, but the aspect of the spontaneous firearms
 18 incidents, we are equally experienced, so that's the
 19 first point.
 20 The second point. That conversation that I would
 21 have needed to have with her would have been a long
 22 conversation and in the early stages of that developing
 23 situation on the night, I did not have the time or
 24 capacity, other than to command the firearms incident on
 25 the ground, to start entering into debates and

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1 discussions with the duty cadre TFC. That briefing
 2 would have been taking place once she was in a position
 3 to take command and control over from me.
 4 Q. Okay. So at this point, she was one -- I'm going to
 5 come to some others in a moment, but she was somebody
 6 who was a cadre TFC who had more formal training in
 7 terms of firearms than you had had?
 8 A. Yes. For pre-planned --
 9 Q. Was of a higher rank?
 10 A. Rank doesn't come into it, but yes.
 11 Q. Who was going to take over the role from you?
 12 A. Who should have taken over the role from me, yes.
 13 Q. Okay, that's a different point. Who you expected to
 14 take over from you. So why would you not discuss it
 15 with her at the point where she is informed of what is
 16 going on?
 17 A. Because she's not the commander at that point. She is
 18 not the commander until she's taken over command and
 19 that's where the handover comes in. That was not --
 20 that would not have been a handover. So all
 21 responsibility, regardless of any discussions I had with
 22 her, because I was still commanding it, were my
 23 decisions, regardless of the outcome, even if I had had
 24 a conversation with her.
 25 Q. Right. So you're going to take a very significant

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1 decision, having informed this officer who was going to
 2 take over from you about the incident, but you were only
 3 going to take her to the departure from this firearms
 4 policy at a later stage?
 5 A. I don't know how it would have played out because
 6 I didn't get that opportunity.
 7 Q. Let's move on from Chief Inspector Buckle. We know that
 8 within a short period of time, Chief Inspector Dexter
 9 called in and volunteered and in fact took over the
 10 tactical firearms command at the scene. Did you discuss
 11 this departure from firearms policy with Chief Inspector
 12 Dexter?
 13 A. No.
 14 Q. Why not?
 15 A. I would think that in the heat of the moment, the
 16 demands that I was under, he was still trying to gain
 17 situational awareness. It was an omission from me, he
 18 should have known I deviated from it and I didn't tell
 19 him.
 20 Q. Well, part of situational awareness was knowing that
 21 neither of the two other main responders, or the three
 22 other main responders if you include BTP, had been
 23 informed of Plato.
 24 A. Yes.
 25 Q. And he was the tactical commander taking over at the

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1 scene.
 2 A. Yes.
 3 Q. A pretty crucial piece of information that you failed to
 4 tell him?
 5 A. Yes. However, travelling in from his location, he would
 6 have been listening and was listening to the firearms
 7 channel, so he would have picked up more situational
 8 awareness from those discussions and those
 9 transmissions. It's a question that you'll have to ask
 10 him, but potentially he would have been aware that Plato
 11 had been declared, not necessarily that I'd kept it away
 12 from the other partners though.
 13 Q. Yes. Sorry, I'm not suggesting that you were keeping it
 14 from Mr Dexter that Plato had been declared, I'm asking
 15 you why you didn't (a) tell Mr Dexter that you hadn't
 16 followed the policy and informed NWSA and GMFRS and (b),
 17 why you didn't discuss it with him whether it was
 18 appropriate?
 19 A. Yes, in hindsight that's what should have happened.
 20 I should have fully informed him. I didn't. I don't
 21 believe that that was a deliberate decision on my behalf
 22 not to inform him. I can only put it down to the fact
 23 of the demands that were on me at the time. But you're
 24 right, with due regard to his position, he should have
 25 known that I'd made that decision and I hadn't told him.

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1 Q. ACC Ford, the senior firearms commander, the strategic
 2 firearms commander on the night, when did you tell her
 3 of this departure from this firearms policy?
 4 A. I didn't.
 5 Q. Why?
 6 A. Again, same answer: it was an omission on my part.
 7 I never actually spoke to her because of the demands
 8 that I was under anyway and, as I've already said, one
 9 of the key contacts that should be made is with the SFC
 10 so the firearms deployment can be ratified. The
 11 pressures and demands on the role at the time and the
 12 ongoing threat didn't allow me to do that, so I wouldn't
 13 have been in a position to inform her.
 14 Q. Yes, but, again, this is a very significant decision,
 15 a very significant departure from policy, and first of
 16 all you didn't inform her, knowing that she would be
 17 a strategic commander liaising with strategic commanders
 18 from the other responding services, and she was left
 19 completely in the dark that you hadn't told them.
 20 A. Yes. But again --
 21 Q. Was that --
 22 A. I believed I was doing the right thing, but I hadn't
 23 informed her.
 24 Q. Right. Was that oversight, was that on purpose?
 25 A. That would be oversight.

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1 Q. Again, given that she was the most senior firearms
 2 commander in the initial stages, again something not
 3 only to inform her but something to discuss whether it
 4 was the right thing to do, isn't that right?
 5 A. Yes.
 6 Q. Again, why not?
 7 A. I was comfortable with the decision I had made. I was
 8 conflicted, but I knew why I was doing it and I was
 9 comfortable with that decision. Yes, as SFC she should
 10 have been informed. As SFC she should have been
 11 informed of my rationale for deploying firearms officers
 12 in the first place. Neither of those happened because
 13 of the time constraints that I had on me and my time.
 14 Q. That's why I think not only I but others are trying to
 15 drill down into whether this was pressure of the
 16 situation that (inaudible: distorted) decisions or
 17 whether you took them on purpose. But here you had
 18 these three more senior firearms commanders, all either
 19 available or coming on to command or coming on to duty
 20 and yet you chose not to discuss it with them or even
 21 inform them; that's the reality, isn't it?
 22 A. Certainly as far as Chief Inspector Buckle is concerned,
 23 there was no need for me to discuss it with her as she
 24 was not in a position of command at that point. Yes,
 25 Chief Inspector Dexter should have been told about it

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1 and wasn't, and ACC Ford, as part of my briefing to her
 2 for the firearms deployment, should have been told about
 3 it. I didn't get an opportunity to do that because of
 4 the pressures. Unfortunately, you broke up on part of
 5 your questioning.
 6 SIR JOHN SAUNDERS: Yes, Mr Weatherby, you've now frozen
 7 completely. There's only 5 more minutes to go.
 8 I wonder if you mind if I take over the last 5 minutes,
 9 leaving you to be refreshed overnight and coming back in
 10 full voice?
 11 MR WEATHERBY: Of course.
 12 SIR JOHN SAUNDERS: Thank you.
 13 You have emphasised that in your mind are your
 14 Article 2 duties to save life.
 15 A. Yes, sir.
 16 SIR JOHN SAUNDERS: I just want to consider another aspect
 17 of that. On your belief at the time and your basis for
 18 Plato and your basis for thinking that the City Room was
 19 a hot zone is that those people within that area were --
 20 their lives were in danger.
 21 A. Yes.
 22 SIR JOHN SAUNDERS: There are the injured there, who need
 23 help, desperately needed help, and I well understand
 24 that. There are also helpers there who may wish to stay
 25 there, despite the danger.

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1 A. Yes.
 2 SIR JOHN SAUNDERS: But your duty as a police officer was to
 3 inform them of the danger so they took the choice. The
 4 police are under an obligation, if they know lives are
 5 in danger, of informing them of that and at least giving
 6 them the choice to decide whether they would get out in
 7 those circumstances or not. Did you consider that?
 8 A. Honestly, no, I didn't consider giving them the
 9 opportunity.
 10 SIR JOHN SAUNDERS: I'm not saying they would have taken it,
 11 and as it turned out obviously they remained and they
 12 did do it, so it all turned out for the best from that
 13 point of view.
 14 A. There's certainly two aspects to it, sir, which is, no,
 15 I didn't consciously consider that, I did consider my
 16 obligations under Article 2, both for the injured and
 17 those who were providing medical treatment to those
 18 injured, so that was very much a consideration in my
 19 decision-making. But, no, I didn't think about giving
 20 them the ability to make a decision.
 21 SIR JOHN SAUNDERS: On the basis of your decision you were
 22 consciously allowing rescuers to remain in there when
 23 you believed that there could be a gunman who's going to
 24 come in any time?
 25 A. Yes. And I also believed that I had sufficiently --

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1 a sufficient armed contingent around them to provide
 2 them with a high level of protection and I think that
 3 outweighed the risk to them.
 4 SIR JOHN SAUNDERS: It's a slight catch--22 situation from
 5 your point of view.
 6 A. Very much so, sir.
 7 SIR JOHN SAUNDERS: Because if it's safe for them to be
 8 there, why isn't it safe for the other medics to come
 9 in?
 10 A. Yes, I can understand that. The rationale I was using
 11 is, they're there. First of all, we go back to the
 12 original suggestion you made that if I had told them and
 13 then I wanted them out of the room anyway, they weren't
 14 going to move and that would have been a problem that
 15 I would have had to deal with. You then get into the
 16 realms of do we start forcibly moving them from that
 17 location. That wasn't going to happen.
 18 SIR JOHN SAUNDERS: I'm not suggesting you do do that. All
 19 I'm suggesting, just as Osman warning letters have to be
 20 written if the police know that someone's life is in
 21 danger, they are under an obligation to inform them of
 22 that. And if it's really Article 2 which persuaded you
 23 to do what you did, I wondered why you didn't think of
 24 that part of Article 2.
 25 A. I don't know. I was only aware that I needed to leave

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1 them there. I had made the decision. Yes, it was
 2 a significant decision, it carried a degree of risk, but
 3 I believe I had mitigated that risk to a certain degree
 4 by having the armed assets around.
 5 SIR JOHN SAUNDERS: Just finally this, which is for
 6 information rather than anything else. You're obviously
 7 aware of Article 2 and what it means. Is that part of
 8 your training? Do all police officers get that
 9 training, is it particularly firearms officers or what?
 10 A. Article 2 runs through policing anyway, sir. Depending
 11 on what area of policing you're in, it certainly
 12 features a lot in public order situations, along with
 13 all the other articles. But obviously, Article 2 is the
 14 underpinning article for deployment of firearms officers
 15 and the rationale for it.
 16 SIR JOHN SAUNDERS: Right. We'll break off. It's exactly
 17 4.30.
 18 MR GREANEY: 9.30 tomorrow.
 19 SIR JOHN SAUNDERS: Is that all right for you?
 20 A. Yes.
 21 SIR JOHN SAUNDERS: I know it's been a long day, so
 22 thank you very much.
 23 (4.30 pm)
 24 (The inquiry adjourned until 9.30 am
 25 on Friday, 7 May 2021)

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