

# OPUS2

Manchester Arena Inquiry

Day 99

May 7, 2021

Opus 2 - Official Court Reporters

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Friday, 7 May 2021

(9.30 am)

CHIEF INSPECTOR DALE SEXTON (continued)

Questions from MR WEATHERBY (continued)

MR GREANEY: Good morning, sir. We'll re-establish the link to Mr Weatherby and then he can resume his questioning.

Good morning.

MR WEATHERBY: Good morning.

Chief inspector, can you see and hear me okay?

A. Yes, I can, thank you.

Q. Thank you. When we broke off, we were considering the decision that you say you took to depart from national and local MTFA and Plato policies and conceal the fact of the Plato declaration from partner services; yes?

A. Yes.

Q. On your own account, that was a decision that you were most anxious about; yes?

A. Most definitely, yes.

Q. Have you got your statements in front of you?

A. Yes.

Q. I can put it on the screen, but I don't think I need to. I'm just going to refer to paragraph 61 of your first statement. I'll read a section of it out:

"In my 29 years of policing, that was one of the hardest decisions I have had to make."

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So that was the decision to leave people in the City Room, responders in the City Room, and to conceal from the emergency services that you'd declared Plato. You go on to say that it could have put people at risk if something went wrong, it could end your career, and you even mention that you considered that you might be prosecuted; yes?

A. Yes.

Q. As we know, you used a dictaphone on the night from before the declaration of Plato; yes?

A. Yes.

Q. Can you just help us in a sentence why you used a dictaphone that night?

A. Quite simply, it was a new piece of equipment that we'd had for approximately 4 weeks for this very reason. I was very much aware at the early stages that it was going to be a dynamic incident and a protracted incident and that it was highly unlikely that I was going to be able to make any kind of relevant notes as is required, and therefore the use of the dictaphone was obvious.

Q. Yes, indeed. So the first purpose of it was so that you had a contemporaneous record of what you were doing and what was happening around you, so far as a dictaphone would pick that up, and of course we've listened to that in totality; yes?

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A. Yes, in the main.

Q. That's the first purpose of it. The second purpose, as I think you've just said, is that it records the decisions that you have made and any rationales for them?

A. Yes.

Q. Have I misunderstood (overspeaking) --

A. Yes, sorry, there's also another reason why it was turned on, as an aide-memoire for me after the event --

Q. Yes.

A. -- to understand what had happened and what was said.

Q. Yes. That's the first point, isn't it, really?

A contemporaneous record of everything that happened so that you could use it for, for example, making a statement or debrief or whatever and anyone else who was looking into what had happened that night could do it, as we have done. So that was the first point. But the second point was that you recognised at a relatively early point that this was a significant night and therefore you turned it on because you wouldn't have time to write down any decisions that you made or their rationales; yes?

A. Yes.

Q. In firearms operations generally, having a record of decision-making and rationales is regarded as being very

3

important indeed, isn't it?

A. It is, yes.

Q. And that's because it helps ensure defensible decisions are made because they have to be reasoned properly at the time?

A. Yes.

Q. And it provides an audit trail so that decisions don't get justified after the fact, post-incident?

A. Yes.

Q. So in the pressurised situation that you knew you were in, you knew it would be impossible to keep a written decision log and therefore you very sensibly used the dictaphone; yes?

A. Yes.

Q. Can you help us then as to why this potentially career-ending -- or a decision that might have led to you being prosecuted, your account, why that decision is not recorded at all?

A. Obviously, you're looking at it from a clinical perspective. In the heat of the moment, it was a new piece of equipment, we'd never used a dictaphone before. It was almost an afterthought after the incident had started I realised I had that facility available to me so it was turned on.

Ideally, you're absolutely correct that any

4

1 decisions that I made should have been verbalised on to  
 2 that. However, because of the initial stages and the  
 3 demands and criticality of decisions being made, then it  
 4 was used more as an ambient listening device rather than  
 5 a contemporaneous account of every single decision  
 6 I made. It should have been, yes, it should have been,  
 7 but it wasn't, and that was down to the fact that I'd  
 8 never used a dictaphone to record decisions in the past  
 9 and the pressures and critical decisions that I was  
 10 making, I couldn't verbalise every single one. But  
 11 I accept what you're saying.  
 12 SIR JOHN SAUNDERS: Mr Weatherby, do you mind if I just  
 13 interrupt for a moment?  
 14 MR WEATHERBY: Indeed.  
 15 SIR JOHN SAUNDERS: I'm trying to remember back and I can't  
 16 honestly remember whether there's any place during the  
 17 dictaphone transcript where we can see you actually  
 18 saying, "I have made this decision and I have made it  
 19 because of A, B, C and D". It may be that we can check.  
 20 But of course if you had, as Mr Weatherby was asking you  
 21 yesterday afternoon, had you shared this decision with  
 22 any senior officer, you would undoubtedly have had to  
 23 rationalise it to him or her?  
 24 A. Yes.  
 25 SIR JOHN SAUNDERS: Okay, thank you.

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1 MR WEATHERBY: Thank you, I'll move on.  
 2 The declaration. I'm not going to ask you any  
 3 further questions about whether it was right or wrong to  
 4 declare Plato; Mr Greaney has dealt with that most  
 5 fully. But I do want to ask you a few more questions  
 6 about the timing of it and then what you did as a result  
 7 of the declaration; okay?  
 8 A. Yes.  
 9 Q. I think we can agree, can't we, that the Plato policy or  
 10 the Plato plans are to react urgently to this form of  
 11 attacker because it's well recognised that their  
 12 intention is to cause maximum loss of life as quickly as  
 13 possible?  
 14 A. Yes.  
 15 Q. So time is of the essence, both in reacting to the  
 16 threat, deploying the armed response, and also  
 17 mobilising assets, partner assets, as well as police  
 18 assets, to deal with casualties?  
 19 A. Yes.  
 20 Q. We know from the FWIN and the records that Mr Greaney  
 21 took you through yesterday, or on Wednesday, that within  
 22 a few minutes of the attack you had credible reports of  
 23 an explosion and multiple casualties.  
 24 A. Yes.  
 25 Q. A bomb, yes?

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1 A. Yes.  
 2 Q. And information coming in, less clear than that but  
 3 nevertheless information coming in, about weapons being  
 4 seen and gunshot wounds?  
 5 A. Yes.  
 6 Q. I'm not going to take you through the entries because  
 7 Mr Greaney did it very clearly. I can do if you want.  
 8 But your evidence was that as the information came in at  
 9 10.34, you were assessing it and you didn't want to have  
 10 a knee-jerk reaction. I think that was your phrase and  
 11 that's perfectly reasonable.  
 12 A. Yes, I think that's what I said.  
 13 Q. Having that information of a bomb, multiple casualties  
 14 and some reports of firearms, you then mobilised ARVs to  
 15 the scene because, perfectly reasonably, there was  
 16 a reasonable suspicion of an ongoing threat?  
 17 A. Yes, that's not why I originally deployed ARVs to the  
 18 scene. As I said in my evidence, I originally deployed  
 19 ARVs to the scene because of the trauma care they could  
 20 provide if it was something other than initially being  
 21 reported.  
 22 Q. Okay, all right. But if that's right that you deployed  
 23 them for medical care, did you immediately alert NAWAS at  
 24 the same time?  
 25 A. No, that's not something that I would need to do. It's

7

1 not a case of if that's what I did: I did do that,  
 2 I deployed them, and that's captured on the radio  
 3 transmissions about deploying them for trauma care.  
 4 It's not the FDO's responsibility to contact NAWAS at  
 5 that point. That was very much a role and contact that  
 6 would be done via the local radio operator for that area  
 7 until we had a full understanding of what was happening.  
 8 Q. All right. I'm not suggesting that firearms officers  
 9 can't give trauma care. Of course, they're much more  
 10 highly trained because of the role they do and they also  
 11 carry much better kit, don't they, than ordinary  
 12 officers?  
 13 A. Yes.  
 14 Q. But they're not substitute for an ambulance and  
 15 paramedics, are they?  
 16 A. Absolutely not.  
 17 Q. No. And also you did have information which indicated  
 18 that there may well have been an ongoing threat from  
 19 marauding terrorists with guns?  
 20 A. Yes, I think potentially you've got your timings  
 21 slightly out there in that the initial stages of the  
 22 incident, as I said in my evidence, it was unclear, we  
 23 do get hoax calls. There was an increase in incidents  
 24 that were coming through and being reported but that was  
 25 very much unclear, and as I said, as a firearms

8

1 commander we don't have -- or as an FDO, we don't have  
2 a knee-jerk reaction to all incidents and the obvious --  
3 sorry, the obvious deployment was for ARVs to get to the  
4 scene to provide trauma care if that is required.

5 I'd also be getting at that point a better  
6 understanding of what was going on and, as the first  
7 officers attended from the firearms unit, the reports  
8 initially back was, "Boss, everything's all right". And  
9 I think -- I don't think we've discussed it but it was  
10 reported that balloons were exploding, but no one's  
11 coming forward. So that was always in the first,  
12 I don't know, 8 minutes or so, 9 minutes of the  
13 incident.

14 Q. Yes, sure.

15 A. So it wasn't going to be a knee-jerk reaction to it.

16 Q. No, I fully understand that you have to have an eye on  
17 hoaxes and false alarms, but the reality is, isn't it,  
18 that by 35 past you had a very credible report from the  
19 arena control room recorded on the FWIN that a bomb had  
20 gone off and there were multiple casualties, and by 36  
21 past you were receiving reports, less clear reports, but  
22 nevertheless reports of gunshots?

23 A. Yes, less clear reports at that point for gunshots. But  
24 again, as I think I said in my statement, I couldn't  
25 just take -- I wasn't willing to just take the

1 information at that point on that face value. There  
2 were obviously other potential scenarios that were  
3 playing around in my head as well, such as an  
4 infrastructure failure at the arena, which would account  
5 for the injuries. That's why I did deploy ARVs when  
6 I did without an authority, but to provide trauma care  
7 should it be needed.

8 Q. Yes, I follow the logic of it, but looking -- and again  
9 I reiterate that this is a cold start, there's no  
10 warning to this, so it's all very difficult. But  
11 looking back on it, you have reacted here to send armed  
12 officers out, yes, no doubt with their trauma expertise,  
13 but also to check it out, hadn't you?

14 A. Yes.

15 Q. Isn't the reality that at that point you had enough  
16 information to declare a Plato?

17 A. No, I don't believe I did.

18 Q. The idea of checking out reports of bomb, multiple  
19 casualties and gunshots rather than declaring a Plato  
20 means that there's inevitably going to be a delay, isn't  
21 there?

22 A. Absolutely, yes.

23 Q. And in JOPs 3, for example, the point is made that if  
24 Plato is declared and it turns out to be a false alarm,  
25 then it can be easily rescinded.

1 A. I wouldn't say easily rescinded, that wasn't my  
2 understanding at the time. I think, as I said, once  
3 Op Plato would have been declared, I don't think I would  
4 have had the confidence at that stage to rescind it.  
5 But I understand your point that actually as soon as  
6 I had fears that there was a potential for an MTFA then  
7 that would meet the criteria for Op Plato. But again,  
8 there was conflicting information coming through and, as  
9 I've already said, from the first officer at the scene  
10 from the firearms teams who said, "Boss, nothing's  
11 happening", that's the type of conflicting information  
12 I'm talking about, so I would have to disagree that  
13 Op Plato could have been declared earlier.

14 Q. Okay. You had this report from the control room, not  
15 just some unverifiable source, saying that there'd been  
16 a bomb and that there were casualties. So there was  
17 a strong basis for understanding this as a terrorist  
18 attack, a serious terrorist attack, from 10.35, wasn't  
19 there?

20 A. No, again, I disagree with that. That wasn't my  
21 assessment at the early stages. It was something  
22 I could consider but I couldn't definitely say at that  
23 point. One minute after I'd been made aware of the  
24 incident, that this was now a full terrorist attack,  
25 I still had to have an open mind about what we were

1 dealing with.

2 Q. Yes, and you sent the ARVs down, and you're quite right,  
3 Mr Richardson, your OFC, his initial view on arrival was  
4 that he couldn't see anything, it may well be a false  
5 alarm?

6 A. Yes.

7 Q. But of course within a very short period of time, within  
8 about 3 minutes, one of your firearms officers,  
9 Mr Moore, was mentioning Plato over the radio?

10 A. As I understand it, that declaration came through, which  
11 obviously gave me that increased cause for concern and  
12 my understanding that, yes, this is most probably now  
13 a firearms MTFA-type incident. And I thought that the  
14 declaration at, I think it was, 22.47 of Op Plato was  
15 around about that same time.

16 Q. Yes. Well, it's 22.43, according to the dictaphone  
17 transcript. But what I'm getting at is that if you'd  
18 declared Plato at an earlier point, then of course the  
19 urgent response that Plato should trigger would have  
20 been triggered that much earlier.

21 A. Yes, but I don't believe that it would have actually  
22 made any significant difference to how the initial  
23 responders responded.

24 Q. And if you had triggered the Plato response instead of  
25 simply deploying the ARVs to the arena, then what would

1 have followed from that would have been contact with  
 2 unarmed officers, either at or coming to the scene, and  
 3 being able to both ask them for situational awareness  
 4 and also to direct them about Stay Safe?  
 5 A. Yes, again, in those early stages that would have  
 6 required me to go on to another radio channel, which  
 7 would leave me out of the loop on the firearms channel  
 8 as a commander and therefore I couldn't have done that.  
 9 In previous -- the usual way of working is that any  
 10 information and any updates would be asked between the  
 11 radio operators and those officers on the ground.  
 12 Q. Yes, but you were in the control room and you could have  
 13 directed somebody in the control room to say, "Find out  
 14 who's there", or, "Find out who's attending", bearing in  
 15 mind that people were asked to go to the arena and you  
 16 could have then given them a Stay Safe direction and set  
 17 up an RVP point for unarmed officers responding to keep  
 18 them safe.  
 19 A. Absolutely, you're correct there. There was an RVP that  
 20 had already been established very early doors by  
 21 Inspector Smith, so that was already in place. But yes,  
 22 what should have happened is unarmed officers should  
 23 have been given a Stay Safe briefing (overspeaking) --  
 24 Q. Sorry, I cut across you, I didn't mean to.  
 25 A. Yes, that didn't occur.

1 Q. In fact, did you speak to Mr Smith?  
 2 A. No.  
 3 Q. At any point?  
 4 A. No.  
 5 Q. So no discussion about Stay Safe or zoning or anything  
 6 with your Bronze commander at the scene?  
 7 A. No. I knew that he would be extremely busy. I was  
 8 extremely busy. The last thing that he needed and the  
 9 last thing I needed was for us to have our eyes taken  
 10 off the ball for a discussion about what should happen.  
 11 Again, the gold standard in a normal major incident,  
 12 without this type of ongoing significant threat, then no  
 13 doubt that would have happened, but not in the very  
 14 early stages.  
 15 Q. If you'd declared Plato rather than just deployed ARVs  
 16 to the scene, you as the tactical firearms commander --  
 17 the tactical commander really, at that point -- would  
 18 have given your armed officers an unequivocal direction  
 19 that they may be facing a lethal threat, wouldn't you?  
 20 A. Yes, I think they were certainly aware of that from my  
 21 previous radio transmissions.  
 22 Q. Yes. As a matter of common sense, they may well have  
 23 had an understanding of that because of what they were  
 24 being told was a possibility going down there, but it  
 25 was your job as the tactical firearms commander to make

1 that -- basically give them a tactical plan, wasn't it?  
 2 A. Yes, but as I said, I think on day 1 of my evidence, APP  
 3 allows you to give the best briefing you can in the time  
 4 that you have, and there is an understanding that if  
 5 your ARVs are actually on the scene dealing with the  
 6 incident, then you have no time to do a proper full  
 7 briefing. You have to give an overview of what you're  
 8 dealing with and I think they understood that.  
 9 Q. But that's not quite the position here, is it, because  
 10 you had communications -- you'd set up your OFC and you  
 11 had communications with him?  
 12 A. Yes.  
 13 Q. You could have given him a tactical plan which would  
 14 have included an unequivocal direction that they were  
 15 going into a scene where decisive action rather than  
 16 contain and negotiate would have been an appropriate  
 17 approach?  
 18 A. Yes, they already knew that. The fact that I'd  
 19 authorised an emergency search, they fully understand  
 20 what that means. They knew that potentially there was  
 21 an active shooter at that location. Ideally, again,  
 22 gold standard, a briefing should be as complete as  
 23 possible with all the ongoing risks and threats, but  
 24 with time constraints that's impossible. So I am  
 25 satisfied, and you may have to ask Mr Richardson whether

1 or not he understood what the scenario was he appeared  
 2 to be going into, but I'm quite confident that they did.  
 3 Q. As a matter of common sense, you might be right, but it  
 4 was your job to give the tactical plan, a proper  
 5 briefing, and beyond that, the plan might well have  
 6 been: go in there, locate the threat, neutralise it,  
 7 decisive action, and then sweep for any kind of  
 8 secondary device and keep in contact as constantly as  
 9 you can with me, the ITFC, in order that we can develop  
 10 the plan?  
 11 A. That's a lot to say when officers are actually pretty  
 12 much on the scene, and as I said, APP allows me as the  
 13 TFC to give the best briefing I can. I know that once  
 14 I've authorised that emergency search, the OFC has a lot  
 15 of things to start putting in place to relation to the  
 16 resources that he's going to use and therefore an  
 17 acceptable briefing for me under these circumstances  
 18 was, as I gave it, potential for a firearms risk,  
 19 emergency search, which they understand is to neutralise  
 20 the threat.  
 21 Q. Yes. I mean, the consequence of you giving some kind of  
 22 tactical plan would be that the OFC can then translate  
 23 that into an operational plan, if you like, and he can  
 24 direct the other armed assets that he's going to be on  
 25 the ground with as to what to do to carry out your

1 tactical overview.  
 2 A. Absolutely. However, the fact that I had informed him  
 3 of the tactic that I'd authorised was an emergency  
 4 search, that, albeit so short, is the starting of  
 5 a tactical plan.  
 6 Q. If you'd done that and given the tactical plan, which  
 7 would have unequivocally told them decisive action, ie  
 8 not the default position of armed officers going to  
 9 a criminal firearms incident but a specific direction to  
 10 those going to a terrorist incident, then whilst they  
 11 were then carrying out that plan under Plato you would  
 12 have then been directing others to contact the unarmed  
 13 officers there, whoever they were, or those that were  
 14 arriving, to ensure that they were safe and that they  
 15 could have given you situational awareness; yes?  
 16 A. It wouldn't have necessarily been the case just for an  
 17 Op Plato. Ideally, with any firearms incident, you want  
 18 to protect the unarmed resources as well. So yes, those  
 19 notifications and those warnings and that advice should  
 20 be given. However, I keep on going back to the fact  
 21 that this was such a fast-moving, developing situation  
 22 that was unclear, and I needed to keep focused on  
 23 what was happening at the scene, that actually what  
 24 you're describing takes me away from being able to do  
 25 that.

17

1 SIR JOHN SAUNDERS: Let's just stop this for a moment. The  
 2 suggestion behind this is that you should have declared  
 3 Operation Plato earlier, as I understand it, then things  
 4 would have progressed in the way Mr Weatherby is  
 5 suggesting. The idea of a terrorist attack at the arena  
 6 is just appalling and the natural reaction of everyone  
 7 is to think, "This can't be happening". Do you think,  
 8 first of all, that this affected your thinking and  
 9 perhaps delayed the declaration longer than it might be  
 10 and whether you say yes or no to that, do you think  
 11 that is a risk?  
 12 A. The first point, sir, I don't believe that that caused  
 13 me to delay declaring Op Plato. Very much so, I didn't  
 14 want what was developing to be true. I knew it was  
 15 a possibility, as I'd already said, because of the  
 16 immediate consideration of what happened in Paris in  
 17 2015, so I knew it was possible, but I just hoped that  
 18 it wasn't true. Until I had a fuller, clearer picture,  
 19 then — and the fact that I'd never — and as far as  
 20 I was aware Op Plato had never been declared, yes, that  
 21 may have to a degree slowed things down, but I can't say  
 22 that it was a deliberate consideration.  
 23 SIR JOHN SAUNDERS: No, no.  
 24 A. Yes, I think it's acceptable to say that under those  
 25 circumstances, I didn't want to make that declaration.

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1 SIR JOHN SAUNDERS: I'm not suggesting it's deliberate;  
 2 rather the contrary, actually. Thank you.  
 3 MR WEATHERBY: Thank you, that's very helpful. And can  
 4 I say I'm not saying you deliberately delayed  
 5 Operation Plato, neither am I suggesting, as a barrister  
 6 looking at this 4 years down the line, that it was easy.  
 7 Of course it wasn't. I'm just trying to drill down and  
 8 partly for future reference. I'm going to move on in  
 9 a moment.  
 10 The reality is that having an Operation Plato policy  
 11 and plans to put it into play is meant to get beyond the  
 12 reticence to declare or to hope that it's not happening  
 13 and to give you a list of things, a ready list of  
 14 things, as you'd translated on to your aide-memoire,  
 15 that you do. So what I'm putting to you is that if you  
 16 had declared earlier, you'd have set in motion expressly  
 17 what the armed officers should do, you would have then  
 18 directed probably somebody else to deal with the unarmed  
 19 officers to make sure they were safe, but could also  
 20 contribute to public safety and also your situational  
 21 awareness, and also at that point you could have alerted  
 22 emergency services partners or delegated that to  
 23 somebody else so that they could have started to  
 24 mobilise their ordinary personnel but also their  
 25 specialist resources. The point about Plato is, under

19

1 JOPs 3, that you err on the side of caution and you  
 2 declare early; isn't that right?  
 3 SIR JOHN SAUNDERS: That's quite a long question. I think  
 4 we've gone over some of the things before. Are there  
 5 things you'd wish to add in response to that question?  
 6 A. Yes. I think that Mr Weatherby is right, how he's  
 7 explained it is ideally what should have happened.  
 8 However, I won't go over the points again, but I've  
 9 given my rationale for not wanting to notify the other  
 10 services. But if it hadn't been for these unique set of  
 11 circumstances then what Mr Weatherby is suggesting would  
 12 have undoubtedly been the best course of action.  
 13 MR WEATHERBY: That's very fair and I'll move on with one  
 14 further question on this.  
 15 At 22.47, when you actually declared Plato, did you  
 16 really have any further information than you'd had  
 17 10 minutes earlier?  
 18 A. Yes. There'd been the declaration from, I think, the  
 19 officer at the scene. There'd been then confirmation —  
 20 I think it was PC Moore had shouted, "Plato, Plato", and  
 21 I'd already considered Plato as we discussed on day 1.  
 22 But it wasn't until — and I thought it was round about  
 23 the exact same time that that declaration was made was  
 24 immediately at that point, if that makes sense, when  
 25 I became aware that officers at the scene now thought we

20

1 were now dealing with a Plato incident.  
 2 Q. Okay, thank you. Let's move on.  
 3 Zoning. Can I just deal with training briefly. On  
 4 Wednesday, I think you confirmed that your only formal  
 5 training in relation to firearms command was the  
 6 one-week ITFC course and that did not have  
 7 a counter-terrorism element; is that right?  
 8 A. That's correct, yes.  
 9 Q. So no zoning formal training that would be relevant to  
 10 a Plato?  
 11 A. No.  
 12 Q. You described that you had an awareness of Plato, the  
 13 Plato plans, which plainly you did, but you got that  
 14 awareness from the development days, the TFC development  
 15 days?  
 16 A. Yes, that and a couple of airport exercises I did in  
 17 early 2016.  
 18 Q. In March 2016. I don't want to go into areas that  
 19 I shouldn't here, but just very briefly on that: there  
 20 were two exercises that you took part in at the airport  
 21 and they were mainly ARV, looking at the ARV response;  
 22 is that right?  
 23 A. Absolutely. I don't think, and I don't recall, that  
 24 there was any partners on that operation, on either of  
 25 those exercises. I may stand corrected, but I certainly

21

1 wasn't aware of any.  
 2 Q. Your recollection is that no Fire Service or no  
 3 Ambulance Service involved?  
 4 A. Yes.  
 5 Q. So your only understanding from development days or  
 6 exercises or training of zoning was from those  
 7 exercises; is that right?  
 8 A. Predominantly, yes.  
 9 Q. And very fairly, you volunteered that as far as you can  
 10 recall, the ambulance and fire weren't there, those  
 11 partners weren't there, therefore no issue as to  
 12 communication really arose on that --  
 13 A. Yes. If we're talking specifically about the two  
 14 exercises then yes, that's right, Mr Weatherby.  
 15 Q. You mentioned that there was some consideration of  
 16 zoning on those exercises. Was there any consideration  
 17 of the need to review zoning (overspeaking)?  
 18 A. I can't say definitely yes or no. The only thing I can  
 19 say is that as a firearms commander, it is constantly  
 20 drilled into us that we constantly review what we're  
 21 dealing with, and as things change, we review. Again,  
 22 that comes(?) under the NDM and that is the thread that  
 23 always runs through our decisions.  
 24 Q. So far as you can recall, no training or development  
 25 awareness about reviewing zoning in a Plato context or

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1 indeed reviewing a declaration of Plato?  
 2 A. Not that I'm aware of on what I picked up, yes.  
 3 Q. Just while we're on training, just before I move on,  
 4 we've heard in the course of the inquiry, following  
 5 Winchester Accord, Mr Giladi, with the other partner  
 6 agencies, instigated some JESIP commander training,  
 7 which took place in January and February of 2017. My  
 8 understanding -- we tried to work out who was there. My  
 9 understanding is that you didn't attend; is that right?  
 10 A. I honestly can't remember. If I'm not on the attendees  
 11 list then, no, I didn't attend. Because the FDOs are  
 12 ITFCs, some of the -- there's not always a necessity for  
 13 us to attend all the inputs. As long as we attend the  
 14 ones that are mandatory and then any others which are  
 15 run to assist our understanding and command, then that's  
 16 what we should do. But specifically those in the period  
 17 you're talking about, I honestly don't recall.  
 18 Q. You don't recall being invited or going?  
 19 A. It sounds like a get-out, but we attend so many  
 20 different -- as FDOs we're invited to attend so many  
 21 different inputs and exercises because a lot of stuff  
 22 that happens within GMP does involve the FDO. Actually,  
 23 rightly or wrongly for me, it's not always clear which  
 24 ones I've actually attended. I would need to look at  
 25 the records.

23

1 Q. I'm not criticising you for the fact that you had such  
 2 a heavy workload or the fact that there was quite a lot  
 3 of training going on. But certainly I have not  
 4 managed -- I've looked at your training records and  
 5 we've trained to ascertain who was at these three  
 6 repeats of this course and it doesn't look like you were  
 7 there.  
 8 Do you think, bearing in mind that the bombing  
 9 happened in May 2017, that you would recall having been  
 10 on a JESIP commander training course that was designed  
 11 following problems which had arisen in Winchester  
 12 Accord?  
 13 A. Yes, I think I would have been aware.  
 14 Q. Thank you. That's very helpful.  
 15 Zoning on the night. In your statement, you assert  
 16 that the immediate vicinity of the attack was a hot  
 17 zone, and Mr Greaney has asked you and pointed out that  
 18 on the dictaphone there's no record of a discussion  
 19 about zoning at the time of the declaration or  
 20 thereafter.  
 21 Was your thinking about the immediate vicinity where  
 22 the bomb had gone off that that was automatically a hot  
 23 zone or was there some more rationale to it?  
 24 A. No, I think with the reports of the gunshots and that  
 25 being the centre of the incident, then I believe my view

24

1 of it -- and it wasn't verbalised but that is definitely  
 2 still -- at that point and until I fully understand,  
 3 that is a hot zone, yes.  
 4 SIR JOHN SAUNDERS: Can I just understand the issue of  
 5 zoning and how far it actually applied based on what  
 6 else you've told us? The armed officers are going to go  
 7 into the red zone so it's not actually necessarily for  
 8 them to know what the red zone is, they're going to go  
 9 into where it's all happened and clear it out. You are  
 10 not going to tell ambulance or fire that there's a red  
 11 zone or where it is because you don't want them to know.  
 12 A. Yes.  
 13 SIR JOHN SAUNDERS: Was there anyone you were going to tell  
 14 where the red zone was?  
 15 A. I honestly hand on heart would say that, no, once  
 16 I decided I wanted to reduce the communication any  
 17 further, then I didn't intend to start declaring zones  
 18 to partners. I think it would be fair to say that it's  
 19 a conversation that myself and PC Richardson should have  
 20 had about it, but again I think, because of the dynamics  
 21 of the developing situation, my belief, and having  
 22 worked with firearms officers for a number of years, was  
 23 they would understand, again, once an emergency search  
 24 has been declared for that area that that would be  
 25 getting treated as a hot zone. But it was never

1 verbalised.  
 2 SIR JOHN SAUNDERS: Thank you. Thank you, Mr Weatherby.  
 3 MR WEATHERBY: In fact, can I just raise Mr Richardson, your  
 4 operational firearms commander, with you, and just maybe  
 5 try and jog your memory. Because in fact Mr Richardson  
 6 says that there was a conversation about zoning. We'll  
 7 hear from Mr Richardson in due course, but in his  
 8 statement he says he recalls a communication about  
 9 zoning and he says that he told you that he considered  
 10 that the foyer, the City Room, was hot, but that it  
 11 should be treated as a warm zone, and that he went on to  
 12 organise armed officers to provide armed cover.  
 13 I don't want it on the screen, but it's paragraph 51  
 14 of his statement for anyone who's taking a note. Do you  
 15 recall any such communication with him?  
 16 A. I believe --  
 17 Q. (Overspeaking).  
 18 A. I'm not sure when that statement was made. That  
 19 conversation didn't take place and I'm sure about that  
 20 because no conversation such as that is captured either  
 21 on my radio transmissions, telephone transmissions or  
 22 dictaphone. So I'm confident that we never had that  
 23 conversation. I can imagine the pressure that  
 24 PC Richardson was under; it was such a horrific  
 25 incident.

1 SIR JOHN SAUNDERS: If you're going to want to explain how  
 2 he could be mistaken, I think we can understand that,  
 3 and we will obviously hear his evidence and consider  
 4 what he's got to say and consider for ourselves whether  
 5 he is mistaken.  
 6 A. Yes, but I am confident that that conversation didn't  
 7 take place.  
 8 MR WEATHERBY: Thank you very much. That's very fair and,  
 9 you're absolutely right, there doesn't appear to be any  
 10 evidence of that conversation from the dictaphone or  
 11 other communications. I simply wanted to give you the  
 12 opportunity as to whether that jogged your memory or  
 13 not, so that's very helpful, thank you very much.  
 14 SIR JOHN SAUNDERS: And Mr Weatherby, that is helpful to me  
 15 too. It's obviously right that I should have very much  
 16 in mind that some contrary evidence may be coming up.  
 17 MR WEATHERBY: Thank you. Can I move on to the  
 18 communication of the multi-agency responders. I'm going  
 19 to do so briefly because this has been covered already  
 20 in some detail and then I'm nearly finished.  
 21 So you're aware from the Greater Manchester Police  
 22 opening statement that they do not support your decision  
 23 to disregard the Plato policy and conceal the  
 24 declaration from the other emergency service partners,  
 25 aren't you?

1 A. Yes, I am aware of that. However, I disagree with their  
 2 statement.  
 3 Q. Yes. Your case -- and I think you've already agreed  
 4 this, but it's very important and I just want you to  
 5 confirm whether my understanding is right. You're not  
 6 suggesting that there was any flexibility in the plans  
 7 here, you're agreeing that you acted contrary to those  
 8 plans?  
 9 A. Yes, but as I said yesterday, APP for armed policing  
 10 does give that flexibility, and I also believe that JOPs  
 11 and the Plato plan give that degree of discretion as  
 12 well. But certainly the rationale I used was, and again  
 13 I've mentioned it a number of times, was Article 2,  
 14 which runs through the APP for armed policing, which  
 15 overruns everything.  
 16 Q. I'm not going to go over that again, I'm simply going to  
 17 suggest to you that the JOPs policy, and indeed your own  
 18 aide-memoire, is quite clear that the emergency services  
 19 partners ought to be contacted as soon as the  
 20 declaration is made as a matter of priority.  
 21 A. Yes, you're correct.  
 22 SIR JOHN SAUNDERS: It's quite difficult to think of  
 23 circumstances when you're dealing with the protection  
 24 and safety of people where they wouldn't be involved.  
 25 I know you think this was an occasion, but actually it's



1 quite difficult to think of any other.  
 2 A. Sir, as I said when I was writing the aide-memoire, and  
 3 looking at JESIP, I could not foresee any situation that  
 4 I could rationalise why I wouldn't contact the partners  
 5 in line of JOPs, and JESIP as well, until this night.  
 6 SIR JOHN SAUNDERS: Thank you. Mr Weatherby, I'm sorry.  
 7 MR WEATHERBY: You're now a chief inspector, so you're no  
 8 longer an FDO, but you are in fact in a role where you  
 9 would play a command role in such an incident, were it  
 10 to happen again; is that right?  
 11 A. Yes, that's right.  
 12 Q. I know things have changed and I'm not going to ask you  
 13 about changes except for one detail. The position now  
 14 remains, does it, that on a declaration of Plato,  
 15 emergency service partners must be told as soon as  
 16 possible?  
 17 A. Yes.  
 18 Q. Is there any circumstance now when you'd support  
 19 a decision not to communicate a declaration of Plato to  
 20 emergency services partners?  
 21 A. Yes, for exactly the same reason I did on the 22nd. If  
 22 we had that same situation, I would do it again.  
 23 SIR JOHN SAUNDERS: I don't want you to tell me what, but  
 24 have the changes which have been made since in fact made  
 25 that unnecessary, that it wouldn't happen again? If you

1 can't answer then don't.  
 2 A. I think the...  
 3 MR GREANEY: Can I say that I'm concerned about going into  
 4 this area with this witness.  
 5 SIR JOHN SAUNDERS: Okay, it's my fault. We will do it, as  
 6 I suggested before, perhaps in writing later. I'm  
 7 sorry, Mr Weatherby, you were being very careful and  
 8 I've just blundered in, but it did seem to be a logical  
 9 question.  
 10 MR GREANEY: May I say, I'm sorry to have done that, but  
 11 plans are being made to ensure this issue is thoroughly  
 12 investigated.  
 13 SIR JOHN SAUNDERS: It's absolutely right that you  
 14 intervene, absolutely.  
 15 Right, Mr Weatherby, you do it in your delicate way.  
 16 MR WEATHERBY: That's as far as I was going to go anyway,  
 17 but that's very helpful. I was being careful and  
 18 Mr Greaney helpfully yesterday told us we'd be getting  
 19 more information in due course.  
 20 Finally on this topic -- as I say, I haven't got  
 21 much more after this topic -- can I return to whether in  
 22 fact you were simply overwhelmed on the night and that's  
 23 why the emergency services didn't get informed about  
 24 Plato.  
 25 At paragraph 44 of your statement you say that

1 having deployed armed assets and assumed the role of  
 2 ITFC:  
 3 "I had to try and block out any distractions to  
 4 allow me to concentrate."  
 5 Were things like the coordination of the  
 6 multi-agency response simply too much for the role you  
 7 were in and formed a distraction, your word, and it  
 8 merely fell off the table?  
 9 A. I think it's a fair assessment. However, it was, as  
 10 I've said, a consideration and a deliberate decision not  
 11 to inform. Would it have been a distraction? As I've  
 12 already said in my evidence, under a normal major  
 13 incident then it would have been the top of my list of  
 14 things to do. But because of the conflicting roles of  
 15 the FDO and my ITFC role, the ITFC role was always going  
 16 to take priority and therefore, although it was  
 17 a deliberate decision, it would have been something that  
 18 I would have had to get someone else to start doing if  
 19 I wanted partners to be fully briefed.  
 20 SIR JOHN SAUNDERS: That just does indicate, doesn't it,  
 21 just how important in your mind dividing the two roles  
 22 from the outset -- how important that is?  
 23 A. Absolutely, sir. I think I've said that all along in my  
 24 statement, that the two roles do not work in these  
 25 circumstances, do not work together. I'm sure there's

1 times where they potentially will do if you take the  
 2 Plato issue out of it. If it was a major incident  
 3 involving a firearm --  
 4 SIR JOHN SAUNDERS: I can understand that, but the reality  
 5 is we're having to provide for a possible Plato  
 6 incident.  
 7 A. Yes, they do not work together and again GMP has gone  
 8 some way to try to address that now.  
 9 MR WEATHERBY: One way of addressing it at that time would  
 10 have been to have an aide-memoire or an action card for  
 11 the force duty supervisor, with some of the tasks that  
 12 you had to do delegated to him or her with you simply  
 13 giving it oversight, as you did your other roles. That  
 14 would have been one way of practically dealing with it,  
 15 wouldn't it?  
 16 A. I agree that if action cards had been in place and were  
 17 understood how to be used and the various roles and  
 18 requirements for each were in place, then yes, certainly  
 19 the demand on me would have been significantly reduced  
 20 and things would have got done in line with JESIP, yes.  
 21 Q. Yes, and with some careful delegation you could have  
 22 managed it, but other people could have done it?  
 23 A. Are we talking about careful delegation on the night, on  
 24 the 22nd? Because if that's the case then I disagree.  
 25 Q. (Overspeaking).

1 A. Sorry, Mr Weatherby, you broke up.  
 2 Q. A plan (overspeaking) --  
 3 SIR JOHN SAUNDERS: Okay, so -- we can't all talk over one  
 4 another. I was going to try to explain what you were  
 5 saying.  
 6 Your view is if you don't have the action cards, so  
 7 if you're not prepared beforehand, if you are making a  
 8 decision to delegate it on the night, you might as well  
 9 get on and do it yourself?  
 10 A. Absolutely, it's quicker to do it yourself than explain  
 11 to 10 different people what you want from them.  
 12 SIR JOHN SAUNDERS: I was trying to bring your question and  
 13 answer together after you broke up, Mr Weatherby.  
 14 A. I would never have used the term --  
 15 SIR JOHN SAUNDERS: Okay.  
 16 MR WEATHERBY: In paragraph 9 of your second statement, the  
 17 same theme, you assert that the ITFC role took priority.  
 18 You say and I quote:  
 19 "I lacked capacity in that period to address the  
 20 requirements of a major incident and it is well  
 21 documented that the combined concurrent roles of FDO and  
 22 ITFC risked compromise to effective delivery."  
 23 Those are your words; yes?  
 24 A. Absolutely.  
 25 Q. I'm not blaming you for this, but that's something that

1 GMP knew well before and should have addressed?  
 2 A. Yes, but I don't think I was fully aware of what they  
 3 knew.  
 4 Q. I want to just turn to what you said in the Kerslake  
 5 inquiry. There's a passage, it's a fairly lengthy  
 6 passage but it may help us because I'm going to suggest  
 7 to you that it's a compelling account from you as to the  
 8 position that you were in.  
 9 Mr Lopez, could we have up {INQ023523T/34}.  
 10 The question doesn't really matter, but in fact the  
 11 panel member is asking you about your partners, your LRF  
 12 partners, so the other emergency services, effectively .  
 13 It's really your answer and I just want to read it to  
 14 you and then ask you some questions:  
 15 "Yeah, I mean, for Operation Plato what JESIP says  
 16 is that I should set up a tri-service radio channel as  
 17 soon as practicable. This is where I have a real  
 18 problem and this is where I might get in trouble here.  
 19 I have a real problem with the JESIP principles. The  
 20 JESIP principle is fine, but it has to be realistic .  
 21 For me to set up another channel, bearing in mind I'm  
 22 releasing staff from critical channels to go and set up  
 23 Silver , to then come and listen to what would have been  
 24 the [something] emergency services [something] at the  
 25 time whilst I'm still dealing with a real threat, so I'm

1 still on command and control and talking to my firearms  
 2 teams on the national firearms channel, listening to the  
 3 radio channel coming in, divisional channel, get that  
 4 increased situational awareness, liaising with my  
 5 counterparts within the surrounding forces because  
 6 immediately I had to mobilise.  
 7 "Once I'd decided it was not Plato, I immediately  
 8 contacted my equivalent in Merseyside and [somewhere  
 9 else] as a start to have their firearms teams released  
 10 to me as part of the national agreement. So they  
 11 started sending all their firearms teams to me. So I'm  
 12 doing that, so there are a number of critical phone  
 13 calls that I need to make that only I can make,  
 14 otherwise they won't be accepted. So I'm making those  
 15 critical phone calls, I'm listening to the national  
 16 firearms channel, I'm listening to the divisional  
 17 channel, I'm listening to all the chat going on in the  
 18 room, I'm listening to -- everyone's coming to me  
 19 picking my head, 'Boss this, this, this, this, this is  
 20 changed, that's changed'. So everything's coming to me  
 21 because the force duty officer is the focal point while  
 22 this is happening.  
 23 "For me then to set up another channel for emergency  
 24 services so I can give them a situational awareness  
 25 whilst I'm dealing with the initial stages is not --

1 it's just not realistic . I couldn't do it, physically  
 2 couldn't do it, I couldn't give anyone responsibility to  
 3 do it because I'd released all my staff to go and start  
 4 setting up Silver . I knew that the other services  
 5 should have a very good situational awareness anyway  
 6 because NWAS were on the ground.  
 7 "Operationally they knew so they were getting  
 8 feedback fed back from their staff on the ground. The  
 9 only issue is whether it was an Op Plato, you know.  
 10 They will have wanted to know what the true threat was,  
 11 but they were still getting that from the officers on  
 12 the ground."  
 13 Then you go on to speak about a NILO and the Fire  
 14 Service. I won't read that through.  
 15 Then I'll pick it up halfway down the next page,  
 16 please {INQ023523T/35}:  
 17 "But I think there has to be an acceptance under  
 18 JESIP that, you know, that a three-way radio channel  
 19 gets set up once things have started to calm down a bit  
 20 and it wasn't -- it was things were still increasing,  
 21 increasing. But yeah, JESIP says I should be setting up  
 22 another channel to discuss with."  
 23 And then it goes on. Then over the page  
 24 {INQ023523T/36}, please, and this is the last bit that  
 25 I'm going to read out:

1 "For me, once you've got your forward command post  
 2 set up that's where the JESIP principles really come  
 3 into their own. We weren't at that point. And like  
 4 I say, I was satisfied that because I knew what services  
 5 were at the scene, certainly the key ones, for NWS  
 6 being the medical side, they knew exactly what was going  
 7 on. I was satisfied with that. They knew it was an  
 8 Op Plato. They were still happy to leave their staff  
 9 in that zone. The police on the ground knew exactly  
 10 what was going on. The Fire Service will have known  
 11 from their communication. Obviously our divisional  
 12 staff kept on making contact with the Fire Service,  
 13 certainly in the early stages, to let them know what was  
 14 happening.

15 "Then, if I'm honest, as things developed, I totally  
 16 forgot about the other services. I knew that actually  
 17 Silver would put a foot on the ball and start, you know,  
 18 really giving that clear picture. And certainly the  
 19 forward command post, once Mark Dexter was on the  
 20 ground, would have been able to do that so I wasn't  
 21 really that concerned about it whilst I'm still dealing  
 22 with this ongoing threat."

23 Okay, chief inspector?

24 A. Yes.

25 Q. You can take that down, thank you very much.

1 So that is a pretty raw account of you being  
 2 overwhelmed, really, isn't it?

3 A. Yes.

4 Q. Too much to do. And during it, you're asserting that  
 5 NWS know about Operation Plato?

6 A. Yes. You have to understand that this interview that  
 7 I gave to the Kerslake Report was a free recall. I had  
 8 no material that I was looking at and it was some time  
 9 after the event. I think it would be reasonable for me,  
 10 as I've already stated in my evidence, that actually  
 11 there's a potential that they would have found out  
 12 because it was on the FWIN, so that would have been  
 13 a potential, yes.

14 SIR JOHN SAUNDERS: Can I just try to summarise what I get  
 15 from that? That is: we all think JESIP is a jolly good  
 16 idea but no one's actually worked out how to make it  
 17 work in practice; is that fair? When I say no one,  
 18 I can only talk about GMP. It may be no one has, but  
 19 actually we're only considering GMP's response. Is that  
 20 fair or not?

21 A. I think it's fair if we're looking at the early stages  
 22 of a significant incident, where there's still an  
 23 ongoing threat. Most definitely that is the case.  
 24 It is not a practical policy to follow. However, it  
 25 certainly is beneficial. As I said there, as things

1 start to slow down a bit and a fuller understanding of  
 2 what you're dealing with -- and I know that part of the  
 3 JESIP -- one of the key areas is about situational  
 4 awareness, joint understanding of risk, but that is not  
 5 always possible when the incident is still developing  
 6 significantly.

7 SIR JOHN SAUNDERS: You say the early stages, but an FCP is  
 8 absolutely critical to JESIP and it never happened. I'm  
 9 not blaming you, it's not your job to do it necessarily,  
 10 but it didn't.

11 A. It didn't, but the declaration -- and this is where the  
 12 understanding of an RVP and FCP needs to be really clear  
 13 and spelt out. My own opinion is that initially the FCP  
 14 will always be within the RVP because it's not until the  
 15 commanders get on the ground that they will fully  
 16 understand the best place for them to get nearer to the  
 17 scene and to deploy.

18 SIR JOHN SAUNDERS: They never went to the same RVP either.  
 19 A. I know, sir.

20 SIR JOHN SAUNDERS: Okay. Right. Mr Weatherby, sorry, that  
 21 was just my analysis of that particular part.

22 MR WEATHERBY: Very helpful, thank you very much.

23 In your aide-memoire, we've had it up on the screen  
 24 a number of times, so unless you want it up there  
 25 I won't put it up, but just to quote one sentence from

1 it, your sentence:

2 "You have to know your limits, what you can  
 3 realistically achieve before you become overloaded."

4 Applying that to the section of the Kerslake  
 5 interview that we've just gone through in some detail,  
 6 you had reached your limit with managing the armed side  
 7 of Plato, hadn't you?

8 A. Yes.

9 Q. In Kerslake, which I think was the first account of any  
 10 detail that you gave, it was before your statements,  
 11 I think, you don't mention in that passage, in fact you  
 12 say the contrary -- you don't mention that you concealed  
 13 from NWS or the Fire and Rescue Service the fact that  
 14 you declared Plato. In fact, you say that NWS were  
 15 aware.

16 A. Yes, I think the fact that I'd, even at that point with  
 17 Kerslake -- I didn't want to... I didn't want to...  
 18 I didn't want for that decision almost to be known.  
 19 I don't know why, but it was certainly something which  
 20 wasn't mentioned to Kerslake. I don't know why I didn't  
 21 mention it. But I certainly wouldn't have wanted to --  
 22 as I had seen it, for me I'd almost got away with it on  
 23 the night, as in I'd achieved to keep people at the  
 24 scene providing medical treatment, and then after that,  
 25 I suppose knowing that it was such a significant

1 deviation, I really didn't want to draw light to it.  
 2 Q. Kerslake was an important inquiry, wasn't it?  
 3 A. Yes.  
 4 Q. It was important that you told it how it was?  
 5 A. Yes.  
 6 Q. The reality is that section is how it was: you were  
 7 overwhelmed, no fault of yours, and it fell off the  
 8 table, the multi-agency communication of Plato, didn't  
 9 it?  
 10 A. Again, I can only say that, no, it didn't, but I think,  
 11 as I said yesterday, as time progressed, I became less  
 12 concerned about making contact once I knew that Silver  
 13 was nearly set up and then that is where the JESIP and  
 14 the tri-service come into play.  
 15 Q. Can I finish just by putting a series of points to you,  
 16 just so that --  
 17 SIR JOHN SAUNDERS: Just before you do that, I just want to  
 18 say this, please.  
 19 Now, over practically a day or more than a day or  
 20 over a day, I've lost count now, maybe four, maybe five,  
 21 maybe three, very skilled Queen's Counsel have been  
 22 trying to persuade you to say that it actually wasn't  
 23 a deliberate decision not to tell the fire and  
 24 ambulance, it was just a cause of complete confusion,  
 25 and the reason they're saying it is: actually, if you

1 look at it all logically, what you're saying doesn't  
 2 necessarily -- I'm not saying this is a decision by me,  
 3 but what they're suggesting is it just doesn't make  
 4 sense and what makes much more sense is what you have  
 5 been saying at other times, "I'm overwhelmed, I can't  
 6 cope with it all, I can't deal with fire and ambulance  
 7 and with the firearms people as well".  
 8 So with great skill they've been trying to persuade  
 9 you to say that but you have been absolutely adamant  
 10 that it was your decision. Are you going to change your  
 11 mind, however many skilled people ask you the question?  
 12 A. No, sir, I came here to tell the truth.  
 13 SIR JOHN SAUNDERS: No, no, please believe me, I'm not  
 14 suggesting you're not.  
 15 A. I came here to tell the truth, and as I said on day 1,  
 16 I think it was, that it would have been easier for me to  
 17 come here and say the demands and the pressures that  
 18 were placed on me by GMP and the role meant that, yes,  
 19 I forgot about it. And my evidence, I'm sure, would  
 20 have been a lot shorter if that was the case, but that's  
 21 not how it happened.  
 22 SIR JOHN SAUNDERS: Okay. Just as long as you understand  
 23 why these questions are being asked in the way they're  
 24 being asked.  
 25 A. Very much so. I can see how it looks.

1 SIR JOHN SAUNDERS: Mr Weatherby, do you want to keep  
 2 trying?  
 3 MR WEATHERBY: No, you've encapsulated exactly what I was  
 4 putting, thank you very much.  
 5 Can I finish by putting a series of points so we're  
 6 all clear about where we're at.  
 7 At no point did you set up or agree an RVP,  
 8 a rendezvous point, with emergency services partners,  
 9 did you, on the night?  
 10 A. Not directly, but the common approach with most of these  
 11 incidents where RVPs are required -- the RVP would be  
 12 put on the FWIN and that would be then translated to,  
 13 obviously, the teams on the ground. The NILO most  
 14 definitely should have been told where the RVP was, but  
 15 as far as not agreeing, the fact that it had already  
 16 been identified by Inspector Smith, the initial RVP,  
 17 then the fact that I agreed with that, I didn't change  
 18 it, is an agreement that that's the right place for  
 19 an RVP. But under normal circumstances, yes, most  
 20 definitely the RVP should have been clearly communicated  
 21 to partners.  
 22 Q. And in fact, was there ever an effective RVP? I think  
 23 we've established there was never an effective joint RVP  
 24 for other emergency services, but was there ever an  
 25 effective RVP even for police attenders?

1 A. My honest opinion is that the RVP was non-existent. It  
 2 was never put in place, it was never used.  
 3 Q. As far as the FWIN is concerned, it appears that  
 4 Inspector Smith, using his initiative, suggests an RVP  
 5 or sets an RVP as he's on his way to the arena. And  
 6 that's about as far as it goes, isn't it?  
 7 A. Yes, and the fact that I understood that to be the RVP  
 8 and utilised -- or the communication that was necessary  
 9 to other people, and obviously not the key people, was  
 10 that that location was the best location. And he would  
 11 have picked that because of his local knowledge.  
 12 Q. And at no point did you determine or even consider  
 13 a forward command post or discuss it with other police  
 14 or emergency services commanders from other services;  
 15 that's right as well, isn't it?  
 16 A. That's right. As I gave evidence on day 1, my  
 17 understanding, and the common practice, was that the RVP  
 18 would always be the first FCP and then the FCP would be  
 19 decided by the commanders on the ground.  
 20 Q. At no point did you declare a major incident?  
 21 A. I didn't believe it necessary. I think it was obvious  
 22 what people were dealing with.  
 23 Q. At no point did you try to establish a tri-service  
 24 communication between the main emergency services  
 25 partners or the police or indeed include BTP in that?

1 A. No.  
 2 Q. At no point, I think we've gone over this a number of  
 3 times, did you communicate your declaration of Plato to  
 4 emergency services partners?  
 5 A. That's correct.  
 6 Q. At no point did you record zoning and, on your account,  
 7 discuss it with anybody else?  
 8 A. That's correct.  
 9 Q. There was no review of the Plato declaration?  
 10 A. No, I disagree with that. Although it wasn't  
 11 verbalised, every time the information was coming in,  
 12 I believe I was reviewing the threat, but as I said  
 13 yesterday, I don't believe I had the confidence to  
 14 withdraw it or rescind it.  
 15 SIR JOHN SAUNDERS: Do you think it's important that, while  
 16 we're on that, obviously Plato does need to be reviewed  
 17 regularly, that it needs to be verbally reviewed? It  
 18 gives an intellectual rigour to it, which if you're just  
 19 saying, "Well, shall I do it? No, I just don't think  
 20 so" --  
 21 A. I think that if the situation and the intelligence and  
 22 the threat has significantly changed, either increased  
 23 or decreased, then I think it should definitely be  
 24 verbalised. I think if there's a piece of information  
 25 that comes in which might slightly affect it I don't

1 think there's a need under the pressures that are likely  
 2 to be there that it should be verbalised at that point.  
 3 I think the policy -- and I'm not going to go into the  
 4 details of it, but the policy on the night was too rigid  
 5 and didn't allow me to do that. That is now not the  
 6 case.  
 7 SIR JOHN SAUNDERS: Thank you, Mr Weatherby.  
 8 MR WEATHERBY: And finally, this. You and your staff  
 9 communicated fairly early on with the duty Silver,  
 10 Mr Nawaz, and with the on-call cadre TFC,  
 11 Chief Inspector Buckle.  
 12 A. Yes.  
 13 Q. During the whole period from when you communicated with  
 14 Mr Nawaz, you and your delegated control room officers,  
 15 during that whole period until you handed over at,  
 16 I think, 00.17, can you tell us what assistance you  
 17 gained from Mr Nawaz?  
 18 A. No direct assistance.  
 19 Q. Can you tell me through the whole period from when  
 20 Chief Inspector Buckle was informed, and you had  
 21 a series of communications with her about handover,  
 22 which never happened, from when she was first informed  
 23 until you handed over at about 00.15, can you help us  
 24 with what assistance she gave you in respect of the  
 25 incident?

1 A. Again, unfortunately, no assistance.  
 2 MR WEATHERBY: Thank you. Those are my questions,  
 3 chief inspector.  
 4 SIR JOHN SAUNDERS: Thank you, Mr Weatherby.  
 5 MR GREANEY: Thank you. I'm going to ask Mr Atkinson to  
 6 take us up until about 11 o'clock, unless by 11 o'clock  
 7 he thinks he's very near to the end of his questions.  
 8 Questions from MR ATKINSON  
 9 MR ATKINSON: I wonder if we could have, please, the JOPs up  
 10 on the screen. It's {INQ008372/6}, if you would. If we  
 11 could enlarge the top half of the page.  
 12 As this makes clear, this is the joint operating  
 13 procedures that apply in an MTFA situation, Mr Sexton,  
 14 but they have many common features, would you agree,  
 15 with what ought to happen in a major incident that does  
 16 not have that particular dimension?  
 17 A. Yes, absolutely.  
 18 Q. Because the JESIP principles ought to apply in any  
 19 situation where there is a need for a multi-agency  
 20 response?  
 21 A. Yes.  
 22 Q. And whatever else this evening was, it was an occasion  
 23 when there was a crying need for a multi-agency  
 24 response?  
 25 A. Yes.

1 Q. But in terms of what this particularly relates to,  
 2 a terrorist attack involving the use of firearms,  
 3 whatever other elements there may be to an MTFA attack,  
 4 there has to be credible information that there is  
 5 a gunman involved; yes?  
 6 A. Yes.  
 7 Q. If it has been an explosion with no gunman, it's not  
 8 an MTFA?  
 9 A. Yes, I would agree.  
 10 Q. It would still be terrorism, it would still be  
 11 a terrorist attack, but not an MTFA one?  
 12 A. Yes.  
 13 Q. In your various radio communications, as caught by your  
 14 dictaphone, you said that you were declaring Plato  
 15 because it was terrorism rather than because of these  
 16 reports about a gunman.  
 17 A. Mm-hm.  
 18 Q. Is the reality, Mr Sexton, that you declared Plato  
 19 because it was terrorism?  
 20 A. No.  
 21 Q. Because there were, as you've fairly accepted, a number  
 22 of reports about gunshots or gun injuries, some of which  
 23 we've seen from the log, were corrected very shortly  
 24 after they'd been given, but the clear and credible  
 25 evidence was: there has been a bomb and there are people

1 who need help; do you agree?  
 2 A. Yes.  
 3 Q. In terms of the information you had from the scene, your  
 4 eyes and ears at the scene, Mr Richardson, was not  
 5 saying that he had seen a gunman or evidence of  
 6 a gunman, was he?  
 7 A. No, he wasn't.  
 8 Q. Others at the scene who could have helped in relation to  
 9 that would have included, would you agree, the BTP?  
 10 A. Yes.  
 11 Q. Because you knew -- and it's page 4 of your dictaphone  
 12 record. So within 4 minutes of it starting you knew  
 13 that BTP were there, and they were inevitably going to  
 14 be there, weren't they, because the arena is just by the  
 15 railway station?  
 16 A. Yes.  
 17 Q. So there were people on scene who could have helped you  
 18 as to whether this was an MTTFA or not?  
 19 A. Yes, they're certainly a source of information.  
 20 Q. Which you did not avail yourself of before you made your  
 21 decision?  
 22 A. No.  
 23 Q. And indeed, you didn't even share your decision with?  
 24 A. Other than the firearms teams.  
 25 Q. You recognised, as your dictaphone showed, very quickly

1 that there was a very real need for emergency services  
 2 to get in there, particularly NAWAS, but really anyone  
 3 who could administer first aid as quickly as they could?  
 4 A. Yes.  
 5 Q. You sent the firearms teams originally because they had  
 6 the resources to help with that?  
 7 A. Yes.  
 8 Q. And, as you agreed yesterday, you were aware that the  
 9 Fire Service had similar resources?  
 10 A. Yes.  
 11 Q. It was your role to liaise with them, wasn't it?  
 12 A. Yes.  
 13 Q. Because you said a little earlier today that it wasn't  
 14 for you to contact NAWAS. With the greatest of respect,  
 15 Mr Sexton, it was absolutely for you to contact NAWAS,  
 16 wasn't it?  
 17 A. No, I think the point I was making in that response was  
 18 to turn out paramedics to an incident, the usual process  
 19 was for the radio operators and their assistants to do  
 20 that. It wasn't for the FDO to start turning out  
 21 paramedics. I accept that in different circumstances,  
 22 with such a major incident, a conversation between  
 23 myself and the ILO would normally have taken place, but  
 24 it wasn't for me to start deploying or attempting to  
 25 deploy paramedics to the scene.

1 Q. Because if we look, Mr Lopez, please, at {INQ007279/23}.  
 2 It's the top half of the page, if you would.  
 3 Notwithstanding the importance of your role, it gets  
 4 a very short entry in the GMP major incident plan, and  
 5 would it be right to say that's in large part because  
 6 in the initial phase of a major incident you are the  
 7 tactical commander and therefore the information  
 8 elsewhere in the plan about what the tactical commander  
 9 should be doing applies to you?  
 10 A. No, not necessarily, no.  
 11 Q. "Initially, FDOs sit as tactical commander for every  
 12 major/critical incident across the force."  
 13 Does that mean that in a major incident, initially  
 14 the FDO is the tactical commander?  
 15 A. Sorry, yes, in relation to that, yes.  
 16 Q. And therefore the initial obligations on a tactical  
 17 commander will apply to you?  
 18 A. Yes.  
 19 Q. One of their many functions, and we all agree that there  
 20 are many, will be to liaise with other agencies such as  
 21 GMFRS and NAWAS. So liaison with the others is  
 22 absolutely your job?  
 23 A. Yes.  
 24 Q. And on the night of the 22nd, that is a job that you did  
 25 not do, would you agree?

1 A. That's correct, yes.  
 2 Q. Just staying with this plan for a moment, if we could  
 3 please, Mr Lopez, go to {INQ007279/73}.  
 4 This is the section of the document that effectively  
 5 is an aide-memoire, a list of things that the tactical  
 6 commander is meant to do, which in the initial stages  
 7 means you as the FDO, as we've just agreed. All right?  
 8 A. Okay.  
 9 Q. So clearly, you weren't at the scene so we're not going  
 10 to ask you about tabards, but effectively the second  
 11 thing down on the list, just at the bottom of the screen  
 12 there:  
 13 "Has this been declared a major incident?"  
 14 So one of the very first things that you as FDO were  
 15 meant to do was ask, "Has a major incident been  
 16 declared?", and if not, do it. And that doesn't appear  
 17 to have entered your thinking at all.  
 18 A. No, I disagree. It did enter my thinking, but as I've  
 19 said through my previous evidence, this is -- when  
 20 you're looking specifically at a major incident that is  
 21 a stand-alone major incident, you pretty much know what  
 22 you are doing and there isn't any significant ongoing  
 23 threat. So how you're describing it is quite right and  
 24 it's what is expected and what would normally have  
 25 happened under management of a major incident, but as

1 I've said, the two conflicting roles for the FDO and the  
 2 ITFC roles -- the ITFC role is going to take priority  
 3 over the FDO role.  
 4 Q. At the early stages, the very early minutes when you're  
 5 getting the information in, unless it's a hoax, it is  
 6 unquestionably a major incident?  
 7 A. Yes.  
 8 Q. It may also be an MTFA?  
 9 A. Yes.  
 10 Q. But it is definitely going to be a major incident --  
 11 A. Yes.  
 12 Q. -- as soon as it becomes clear there's a bomb?  
 13 A. Yes.  
 14 Q. And would you agree it became clear that there had been  
 15 a bomb more quickly than it became more credible to you  
 16 that there was a gunman involved?  
 17 A. Yes, but I would say within the first few minutes, as  
 18 I already said, the consideration that I was giving,  
 19 bearing in mind that I was made aware of the incident at  
 20 22.34, I think it was, my consideration still was that  
 21 it's potentially -- or I couldn't rule out an  
 22 infrastructure failure .  
 23 Q. If we go to the top of the next page, please, Mr Lopez,  
 24 {INQ007279/74}. This is the tactical commander's role,  
 25 so we appreciate that there was no obligation on you to

1 tell yourself, which is the first in that list of  
 2 people. But numbers 2 and 3 again, and for that matter  
 3 number 5, people who you should have been contacting or  
 4 ensuring contact had been made with as quickly as  
 5 possible on this plan included the other emergency  
 6 services, who ultimately were involved?  
 7 A. Yes.  
 8 Q. And who inevitably you would expect to be becoming  
 9 involved?  
 10 A. Yes.  
 11 Q. If we could go down, please, to {INQ007279/75}. It's  
 12 just a bit further up the page if you would, Mr Lopez:  
 13 "Identify where the forward command point is to be  
 14 sited."  
 15 The chairman very kindly said that it wasn't your  
 16 fault that an FCP wasn't set up. One of the jobs of the  
 17 tactical commander, which was you in the early stages,  
 18 was to ensure an FCP was set up, wasn't it?  
 19 A. Yes. But if you look at the heading, it's also about  
 20 the ground--assigned, those at the scene, so I think that  
 21 refers -- in fact, I would assert that that refers to  
 22 those commanders on the scene, on the ground, and  
 23 I believe my responsibility was the RVP, which again  
 24 I've explained why I believe that the FCP sits there  
 25 initially .

1 Q. Pausing there, we can understand perhaps that you would  
 2 think that someone on the ground might have a better  
 3 ability to site the FCP than you sat in the control  
 4 room.  
 5 A. Mm--hm.  
 6 Q. But it had to happen and it had to happen quickly; yes?  
 7 A. Ideally, yes.  
 8 Q. Well, not ideally, essentially, Mr Sexton. If it was  
 9 going to be a multi--agency response, there had to be  
 10 an FCP.  
 11 SIR JOHN SAUNDERS: Can we just -- I don't want either of  
 12 you to be at cross--purposes. What you're saying is,  
 13 well, for me, the RVP is the FCP.  
 14 A. Yes.  
 15 SIR JOHN SAUNDERS: So do you agree then within that  
 16 context, if you're right about that, that the RVP needs  
 17 to be set up very quickly?  
 18 A. Yes.  
 19 SIR JOHN SAUNDERS: Okay.  
 20 MR ATKINSON: And it has to be an RVP that everybody knows  
 21 about rather than just one element of the response?  
 22 A. Of course.  
 23 Q. Because it's not going to be any kind of command point,  
 24 control point, if there isn't that co--location  
 25 happening?

1 A. Absolutely correct, yes.  
 2 Q. So whether it's making sure there's an RVP that  
 3 everybody has had shared with them or an FCP, it has to  
 4 happen early and it has to be shared?  
 5 A. Yes, it does, it has to happen as soon as possible, but  
 6 it shouldn't detract from the immediate response to the  
 7 actual threat of the incident.  
 8 Q. So if you have information from Inspector Smith that he  
 9 has identified an RVP, the next thing that has to happen  
 10 is that the other emergency services are told that?  
 11 A. Absolutely, yes.  
 12 Q. And then you need to be saying to Inspector Smith, "Set  
 13 up your FCP" --  
 14 A. Yes.  
 15 Q. -- if he hasn't already reported to you that he's done  
 16 it?  
 17 A. Yes.  
 18 Q. And that didn't happen, did it?  
 19 A. No.  
 20 Q. And that would apply whether this was a Plato incident  
 21 or not?  
 22 A. Absolutely. That requirement would stand with both.  
 23 Q. {INQ007279/78}, please. The bottom of the page there:  
 24 "Consider activation of Airwaves IBIS."  
 25 So this is the kind of interoperability channel that

1 NWAS were contacting your control room to ask about,  
 2 isn't it?  
 3 A. I don't know the intricacies of how the system works  
 4 between the two radio operators. Airwaves is our  
 5 system, yes.  
 6 Q. And that would have been a way of putting those in  
 7 command from the different agencies in contact with each  
 8 other?  
 9 A. Yes.  
 10 Q. And that is something that this plan, as you've already  
 11 agreed, as with the JOPs, is something that's meant to  
 12 happen early?  
 13 A. At the earliest opportunity, yes.  
 14 Q. Not once Silver command has been set up?  
 15 A. As I've said through my evidence, I think there's  
 16 aspects of JESIP which are unrealistic until Silver  
 17 command has been set up, but I certainly think there are  
 18 certainly areas that can be done, responsibilities done  
 19 early doors, yes, early on.  
 20 Q. Because what would matter is that those who are going to  
 21 be dealing with this on the ground are in radio contact  
 22 with each other until they can be in physical contact  
 23 with each other?  
 24 A. Yes.  
 25 Q. And what it says here is:

57

1 "Would direct communication between responders be  
 2 beneficial in responding to the incident?"  
 3 On any view in this incident, clearly yes; would you  
 4 agree?  
 5 A. Yes.  
 6 Q. "Consider requesting activation of an IBIS channel via  
 7 the FDO."  
 8 So this is a tactical commander who is not you  
 9 contacting you to set up a channel?  
 10 A. Yes.  
 11 Q. So you could set up a channel and then leave others to  
 12 use it?  
 13 A. Yes, it's possible. But it wouldn't need the FDO to  
 14 actually to set it up, it's channel that they would need  
 15 to -- I suppose the FDO could identify which channel  
 16 would be used and for that to be communicated.  
 17 Q. And you then wouldn't have to then be monitoring that  
 18 the whole time, you could leave that to the people who  
 19 were going to be dealing with it on the ground, couldn't  
 20 you?  
 21 A. Yes, it would be -- if it was purely for that command  
 22 and control, but at the early stages, as an FDO,  
 23 if I have a degree of command and control over that  
 24 incident I need to be listening in to it so, no, it's  
 25 not acceptable to leave it for it to be unmonitored.

58

1 Q. But it still had to be done?  
 2 A. Ideally, yes.  
 3 Q. I suggest essentially it had to be done.  
 4 A. I say ideally it would have been to be done, yes.  
 5 Q. And finally in this document, {INQ007279/79}. In the  
 6 middle of the page:  
 7 "Consider activation of casualty and information  
 8 bureau."  
 9 This is one of the things that arose -- we heard on  
 10 the dictaphone and which you said would have to wait.  
 11 And what was being asked was the casualty bureau text be  
 12 sent out. Was that so that the families of those who  
 13 had been at the arena would have a number to call to  
 14 find out about their loved ones?  
 15 A. It's that anyone who believed that they may have  
 16 a person that they know involved, for them to ring in to  
 17 give the details and for those details to be collated so  
 18 that identification at a later date can be made, yes.  
 19 Q. Again, this indicates, the second paragraph:  
 20 "The request for that to be activated is to be made  
 21 via the FDO."  
 22 So this was, on the face of this, another job for  
 23 you and we can see it was a job that was raised with you  
 24 on the night. Do you think realistically that ought to  
 25 be a job that is taken away from the FDO because it's

59

1 an important thing to happen early but not something  
 2 that you needed to deal with?  
 3 A. My personal opinion is it is ridiculous that it's the  
 4 FDO that sets up the casualty bureau.  
 5 SIR JOHN SAUNDERS: It has to go through the ACC anyway.  
 6 A. It has, yes, but the system we use -- we would have had  
 7 to use on the night, although it has changed  
 8 significantly again because of the learnings, was so  
 9 long-winded for the FDO to do that there wasn't a chance  
 10 that I was going to get round to doing it.  
 11 MR ATKINSON: Thank you, sir, that's all I need to ask about  
 12 that document. That would be a convenient moment.  
 13 SIR JOHN SAUNDERS: I'm just going to ask one thing. You  
 14 were being asked by Mr Atkinson fairly early on whether  
 15 in reality what was happening was, once you knew it was  
 16 a terrorist attack, that your automatic reaction was to  
 17 call Operation Plato and you said no. I just want to  
 18 examine that a bit.  
 19 A bomb goes off, a bomb in a crowded area or in any  
 20 place where there are lots of people around. It  
 21 automatically must come to your mind that it could be --  
 22 it could be, not has to be -- a terrorist attack of some  
 23 sort?  
 24 A. Absolutely, yes.  
 25 SIR JOHN SAUNDERS: Following Mumbai and other attacks,

60



1 you are well aware that if a bomb goes off, particularly  
 2 in a crowded area, that the terrorists may well use  
 3 a gunman who can then ambush people coming on the scene.  
 4 A. Yes.  
 5 SIR JOHN SAUNDERS: So it's automatically a possibility?  
 6 A. Yes.  
 7 SIR JOHN SAUNDERS: So once you know a bomb has gone off,  
 8 really you know there is a possibility of a gunman,  
 9 don't you?  
 10 A. Yes, but I think in the early stages, and there were  
 11 reports of gunshot wounds --  
 12 SIR JOHN SAUNDERS: Let's forget about those. I'm just  
 13 wondering whether, in reality, automatically --  
 14 A. I see what you're getting at --  
 15 SIR JOHN SAUNDERS: -- once you know it's a bomb and  
 16 a terrorist attack, because of the risk of there being  
 17 a gunman, the reaction maybe ought to be to activate  
 18 Operation Plato?  
 19 A. I respectfully disagree with that, sir, in that the bomb  
 20 in itself for me, and in guidance with Op Plato policy,  
 21 wouldn't automatically dictate that it's an MTFA. There  
 22 are a number of issues. It could have been a secondary  
 23 device, as we discussed. But the bomb in itself  
 24 exploding, it's a reasonable assumption to start making  
 25 that connection that there's potentially going to be

61

1 further attacks, whether it's another bomb or whether  
 2 it's shooting, but that point by itself, for me, that  
 3 wouldn't justify Op Plato and Op Plato doesn't allow it.  
 4 SIR JOHN SAUNDERS: This is a real issue: do you declare  
 5 Plato because you realise there is a threat that there  
 6 may be a gunman going in or do you not declare Plato  
 7 until you have really at least some good information  
 8 that there is a gunman around --  
 9 A. I think ...  
 10 SIR JOHN SAUNDERS: -- because they may be entirely  
 11 different situations?  
 12 A. Most definitely, sir. My own take on it is that, as  
 13 I said before, and I know it's a simplistic phrase to  
 14 use in these horrendous circumstances, but a knee-jerk  
 15 reaction should never take place. Therefore my own  
 16 opinion in assessing the risk, the true risk, is  
 17 it would need to be supported by at least some more  
 18 evidence that there's a gunman rather than the  
 19 possibility that there's a gunman just because there's  
 20 been an explosion.  
 21 SIR JOHN SAUNDERS: Okay. Quarter of an hour, 20 past?  
 22 (11.08 am)  
 23 (A short break)  
 24 (11.27 am)  
 25 SIR JOHN SAUNDERS: Mr Atkinson.

62

1 MR ATKINSON: Mr Lopez, could we go back to the JOPs, it's  
 2 {INQ008372/9}, just to get your bearings as to what  
 3 we're looking at.  
 4 This is the section of the JOPs that deals with  
 5 a series of things that need to happen as part of the  
 6 mobilisation and assessment of an incident. Again,  
 7 although this is a document that's primarily aimed at  
 8 an MTFFA situation, a lot of these multi-agency aspects  
 9 are things that apply to any major incident, as we have  
 10 already agreed.  
 11 We don't need to look at number 1. You've been  
 12 asked a good many questions about the decision to  
 13 declare and I'm not going to ask you any more about  
 14 that.  
 15 If we could go on, please, to page {INQ008372/10}.  
 16 4.3:  
 17 "The response to an MTFFA will be police-led."  
 18 And one understands the reasons for that. But the  
 19 second paragraph of that section:  
 20 "During the course of an attack, certain situations  
 21 may require that either the FRS or Ambulance Service  
 22 take a lead role in certain aspects of the incident  
 23 response..."  
 24 And clearly, so far as the Ambulance Service is  
 25 concerned, that relates to casualty treatment. So you

63

1 would expect, whatever kind of incident this was, NWAS  
 2 would take a lead on dealing with casualties, but under  
 3 the umbrella of a police coordinated response?  
 4 A. Yes.  
 5 Q. And for that to work, the police and NWAS need to be in  
 6 contact, don't they?  
 7 A. Yes.  
 8 Q. Then, at the bottom of our screen, 4.4:  
 9 "The police will instigate a three-way  
 10 telecommunication link between the emergency services'  
 11 control rooms. This line of communication should be  
 12 maintained until ambulance and FRS representatives are  
 13 operational within an agreed tactical coordinating  
 14 group."  
 15 So it's clear, this is not a three-way communication  
 16 that is meant to happen once Silver has been set up,  
 17 this is communication that's meant to happen until  
 18 Silver has been set up, isn't it?  
 19 A. Yes.  
 20 Q. So this is what is meant to happen as quickly as  
 21 possible?  
 22 A. Yes.  
 23 Q. There was, would you agree, much that the services  
 24 needed to communicate about, whether they knew about  
 25 Plato or not?

64

1 A. Yes.  
 2 Q. There was a need for them to communicate, whether they  
 3 knew about Plato or not, and an expectation that they  
 4 should do that?  
 5 A. Yes.  
 6 Q. So opening a three-way communication channel would not  
 7 have told anyone in and of itself that you were treating  
 8 this as Plato?  
 9 A. No, again, I disagree with that assertion. The very  
 10 fact that you have three services speaking together,  
 11 I think it would have been very difficult to avoid  
 12 in that direct conversation, to avoid identifying that  
 13 Plato had been declared.  
 14 Q. But whether this was Plato or not, would you not need  
 15 the services to be discussing who needed to go where and  
 16 to do what?  
 17 A. Yes.  
 18 Q. And how they were going to be supported?  
 19 A. Yes.  
 20 Q. What the risks to them were?  
 21 A. Yes.  
 22 Q. And therefore what protection they would need?  
 23 A. Yes.  
 24 Q. You knew that both NWS and the GMFRS had specialist  
 25 units that could work in locations that others of those

65

1 services couldn't?  
 2 A. Yes.  
 3 Q. And so identifying where those people could go and what  
 4 they could do was important?  
 5 A. Yes.  
 6 Q. All of that could happen without mentioning the P word  
 7 at all, couldn't it, Mr Sexton?  
 8 A. Not during a Plato operation, I don't believe, no.  
 9 Q. If we go on, please, to {INQ008372/15} of this document.  
 10 Paragraph 4.12:  
 11 "The boundaries of the hot, warm and cold zones must  
 12 be frequently reviewed. On-scene commanders from each  
 13 service need to ensure that there is a clear  
 14 understanding in relation to the agreed boundaries of  
 15 hot, warm and cold zones, and agreed LoE and that these  
 16 are effectively communicated to operational personnel."  
 17 And it talks about the need to continuously assess.  
 18 That appears to envisage those on the ground agreeing  
 19 the zones.  
 20 A. I disagree. I disagree to a certain extent in that  
 21 because this is during a firearms threat, under an MTF, A,  
 22 ultimately it's the firearms commander who will decide  
 23 how far the hot zone goes, for argument's sake. I think  
 24 it's then potentially a discussion of LoE for the warm  
 25 zone, and then the cold zone I think is almost -- again

66

1 is almost a given. But during a developing and  
 2 quick-time changing incident, to start entering  
 3 a discussion with three commanders as to what each  
 4 thinks is a hot zone, a warm zone or a cold zone is  
 5 likely or could potentially, although there's never been  
 6 any evidence of it, potentially slow things down  
 7 in relation to agreeing those zones.  
 8 SIR JOHN SAUNDERS: Mr Atkinson, I'm not necessarily  
 9 disagreeing with what you say about how difficult  
 10 it would be in the course of it, but there is, I've  
 11 momentarily forgotten, the limit of... There's another  
 12 phrase.  
 13 A. Exploitation.  
 14 SIR JOHN SAUNDERS: Thank you. And that is specifically  
 15 said to be agreed between commanders and we've actually  
 16 discussed it and they've really said: well, at the end  
 17 of the day, the police -- what they say will go, but  
 18 actually we're all meant to have a say in it. So that  
 19 does seem to be what the provision is.  
 20 A. I think practically, sir, that's what would happen.  
 21 SIR JOHN SAUNDERS: The police would say?  
 22 A. The police would say and the others, unless they had  
 23 real information we weren't aware of, would agree.  
 24 MR ATKINSON: On the same topic if we could go back a page,  
 25 {INQ008372/14}, 4.10:

67

1 "The police on-scene commander will lead a joint  
 2 assessment of risk at the FCP (or RVP) with ambulance  
 3 and FRS counterparts to determine when and where to  
 4 deploy emergency service responders, taking into  
 5 consideration all available information."  
 6 So what is envisaged here is that the on-scene  
 7 commanders meet up, in fairness to you, at either an RVP  
 8 or an FCP and jointly assess where it is safe for people  
 9 to go and clearly that's a process that's led by the  
 10 police but involves them all?  
 11 A. Yes.  
 12 Q. So the reality would be, would it not, that what needed  
 13 to happen was for the three services to agree how to  
 14 help people safely?  
 15 A. Yes.  
 16 Q. To identify what the risks were and how best those could  
 17 be mitigated?  
 18 A. Yes.  
 19 Q. So they could all then make a decision as to what risks  
 20 were needed to be taken and what couldn't?  
 21 A. Yes.  
 22 Q. And that would be the case whether this was a Plato or  
 23 not, they would need to assess who can safely work  
 24 where?  
 25 A. Yes.

68

1 Q. Because, for example, if a bomb has gone off in  
 2 a location, that location may not be safe as a result of  
 3 the bomb?  
 4 A. Correct.  
 5 Q. And that needs to be taken into account?  
 6 A. Yes.  
 7 Q. But the services meet together, they consider that, and  
 8 they work out: these specially trained people, they can  
 9 go there because that's what they're trained for, others  
 10 need to hold back?  
 11 A. Yes.  
 12 Q. And how do we make that work?  
 13 A. Yes.  
 14 Q. And the sooner that happens, the sooner they can  
 15 actually be helping people?  
 16 A. Yes.  
 17 Q. And the sooner that happens, the more people they can  
 18 get in, who are the right people to do that job?  
 19 A. Yes.  
 20 Q. And that needed them to speak to each other?  
 21 A. Yes.  
 22 Q. And that was one of your jobs, Mr Sexton?  
 23 A. Yes, one of my many responsibilities.  
 24 Q. And you chose not to initiate that conversation because  
 25 you were focused on the firearms aspect?

1 A. No, I think you're being slightly inaccurate in the way  
 2 you just assessed that. I chose not to inform them  
 3 because I knew discussing those zones, discussing the  
 4 risk, discussing the ongoing threat, they would have, as  
 5 I've said before, and I don't intend to go into the  
 6 detail again -- that my understanding is that they would  
 7 have withdrawn their resources from the hot zone, and  
 8 I believe Article 2 will always overarch any policy  
 9 that's in place. So I disagree.  
 10 Q. Your assessment, as you told us yesterday, was that you  
 11 had sufficient firearms officers on site to protect  
 12 those who were helping people in the City Room. So if  
 13 you had been asked, if your on-scene firearms commander  
 14 had been asked, that is what they would have told the  
 15 other services, wouldn't they?  
 16 A. I think what I said yesterday was I took a calculated  
 17 risk that the resources I had there were sufficient to  
 18 give a degree of protection.  
 19 Q. And calculated risk is what we're dealing with here,  
 20 aren't we?  
 21 A. Yes.  
 22 Q. And what the others would be dealing with. So in terms  
 23 of assessing what would be safe and where they could  
 24 work, the information that would have come from you, if  
 25 you'd had the conversation with them, is, "It's

1 a calculated risk but I have the fire officers there to  
 2 protect people helping people in the City Room"?  
 3 A. Yes, but I also would have informed them that I am  
 4 treating it as a hot zone, at which point I have no  
 5 doubt that they'd have tried to withdraw or they would  
 6 have withdrawn their resources.  
 7 Q. Or they could have had a discussion with you as to  
 8 whether you were wrong that it was the hot zone by  
 9 reference to the definition and by reference to the fact  
 10 that there was no immediate threat in that room?  
 11 A. Yes, I would think from my understanding and  
 12 conversations with all -- with the other partners at  
 13 command level that if I had said, "I'm treating that as  
 14 a hot zone because I have a real concern that there's an  
 15 active shooter nearby", I could guarantee that they  
 16 would have withdrawn until I was -- withdrawn their  
 17 staff until I confirmed to them that actually what we're  
 18 dealing with is a warm zone, not a hot zone, and then  
 19 they would have sent in their HART team and SRTs, in my  
 20 opinion, and I think I am best placed to say that  
 21 alongside other commanders.  
 22 Q. But you didn't share it with the other commanders, did  
 23 you?  
 24 A. For the reason I have given.  
 25 MR ATKINSON: Thank you, sir.

1 SIR JOHN SAUNDERS: Thank you, Mr Atkinson.  
 2 MR GREANEY: Sir, Mr Cooper next.  
 3 Questions from MR COOPER  
 4 MR COOPER: I want to ask you a little more about GMP.  
 5 There is lots of focus on you at the moment but let's  
 6 try and bring GMP back into this, if we can, because  
 7 that might assist this inquiry as well.  
 8 Certainly as far as your actions on the night are  
 9 concerned, until recently GMP had been supporting you,  
 10 hadn't they, and backing you?  
 11 A. Yes.  
 12 Q. Yes. They facilitated your promotion, I'm not  
 13 criticising, but they facilitated your promotion after  
 14 the event, didn't they, to chief inspector?  
 15 A. Yes, but my promotion had nothing to do with my actions  
 16 on the night.  
 17 Q. Of course, but GMP knew full well what had gone on, I'm  
 18 being neutral at the moment, with your decision-making  
 19 process, on the night, on the 22nd, and facilitated your  
 20 promotion after it to chief inspector?  
 21 A. Yes.  
 22 Q. And you were awarded the Queen's Medal as well, weren't  
 23 you --  
 24 A. Yes.  
 25 Q. -- in 2019 for the work you did on the 22nd?

1 A. Yes.  
 2 Q. And again, GMP didn't step in the way of that, they  
 3 supported the accolade, as far as you're concerned?  
 4 A. Yes.  
 5 Q. I'm just trying to clarify this just in case, because  
 6 one of the things that this inquiry is very concerned  
 7 about is scapegoating and I just want to bring back into  
 8 focus GMP here.  
 9 So whatever --- and indeed I may ask you questions in  
 10 due course, as is my duty on behalf of the families,  
 11 that may be critical of your actions, and you're  
 12 a professional man, you'll deal with that  
 13 professionally, it is important, isn't it, that we  
 14 recognise that whatever criticisms GMP may be making  
 15 about you now in this inquiry, it's a relatively fresh  
 16 event for them, isn't it? Up until now they've totally  
 17 supported you knowing full well what you did on the  
 18 night?  
 19 A. Yes.  
 20 SIR JOHN SAUNDERS: We don't know anything's gone on in  
 21 between. I understand what you say about basic  
 22 principles. I certainly don't want to be going into  
 23 a review about what GMP may have been thinking ---  
 24 MR COOPER: I have finished that line, sir. I just wanted  
 25 to establish that and perhaps refocus a little.

1 A. Could I just say, Mr Cooper, that there is one aspect of  
 2 my decision—making which they're not supporting, as  
 3 I understand it; however, they have been supportive in  
 4 every other aspect.  
 5 Q. As far as that aspect of your decision—making process  
 6 that GMP aren't supporting, that certainly is  
 7 a relatively fresh event as far as you're concerned? Up  
 8 until now it's not got in the way, as far as they're  
 9 concerned, of either your promotion or indeed your award  
 10 of the Queen's Medal?  
 11 A. That's correct, yes.  
 12 SIR JOHN SAUNDERS: And they have recognised their support  
 13 for you in recognising that they overburdened you on  
 14 that night and they have made changes to their  
 15 procedures as a result.  
 16 A. Yes, very much so.  
 17 MR COOPER: You were asked questions, perfectly properly, by  
 18 counsel for North West Fire Control, some probing  
 19 questions, and I want to ask you a little more about the  
 20 control room --- this has not really been covered yet,  
 21 it's a new area --- and what positive lessons perhaps can  
 22 be learned by the way the police initiated and ran their  
 23 control room, perhaps in comparison to other agencies,  
 24 say such as fire.  
 25 What I would like to do is take you to a document,

1 if I can, that you've not yet been taken to, but  
 2 obviously was referred to in the Rule 10s. That's  
 3 {INQ029175/1}.  
 4 This just deals with the report into the OCB and the  
 5 operation of the OCB. I would just like to take you to  
 6 a few selected paragraphs on that and ask you to explain  
 7 why these things were done and what positive help they  
 8 were within the control room.  
 9 Can I take you to paragraph 6, please {INQ029175/2}:  
 10 "Risk is understood to be the possibility or  
 11 likelihood of something occurring. Staff are trained to  
 12 try to identify /assess low, medium or high, manage and  
 13 review the expected or forecast levels of harm to  
 14 individuals, the public, offenders or property. They  
 15 should consider a full range of historical, current,  
 16 potential and foreseeable factors in determining levels  
 17 of risk."  
 18 We're referring here, are we, Mr Sexton, to staff  
 19 who are available in the control room?  
 20 A. The control room and within the call—handling role  
 21 I think as well.  
 22 Q. What sort of training do they receive, just broadly if  
 23 you can?  
 24 A. Unfortunately, you may be better asking Ian Randall  
 25 in relation to that. The only reason I say that is that

1 although the FDO works within the control room, we  
 2 really have very little involvement in the actual  
 3 day—to—day running of that control room and the  
 4 training, et cetera, that goes with it. We are  
 5 a separate cohort. I could give you my opinion, but it  
 6 could be wrong.  
 7 Q. I don't want to encourage you to give an opinion that is  
 8 wrong and perhaps I will take your guidance on that.  
 9 But let me take you then to paragraph 7 and just  
 10 familiarise with what it says in paragraph 7:  
 11 "OCB operated primarily from..."  
 12 And that's redacted. I have spoken to Mr Greaney on  
 13 this point. I was to ask you not about the precise  
 14 location of the OCB but simply to ask you --- I'm  
 15 grateful, Mr Greaney. It's simply to ask you: was it  
 16 based in Manchester?  
 17 A. Yes.  
 18 Q. Thank you. So the advantages perhaps are recognised,  
 19 are they, by Greater Manchester Police of a control room  
 20 being based locally?  
 21 A. Yes. I think you can --- as in within the Greater  
 22 Manchester Police area, yes.  
 23 SIR JOHN SAUNDERS: I think you're contrasting with British  
 24 Transport Police, are you?  
 25 MR COOPER: I'm contrasting with fire.

1 SIR JOHN SAUNDERS: Okay, thank you.  
 2 MR COOPER: That's my direct comparison.  
 3 A. Yes, certainly within the boundaries of Greater  
 4 Manchester Police, yes.  
 5 Q. What are the advantages of that rather than, say, having  
 6 something hundreds of miles away?  
 7 A. I think it's obvious. It's local knowledge of the area,  
 8 it's potentially a better understanding and working  
 9 relationship with officers on the ground, and  
 10 geographically staff can be moved around if necessary,  
 11 but it's certainly more beneficial to have that local  
 12 connection.  
 13 Q. In fact, would you say, in the situation which was  
 14 developing on the 22nd, critical?  
 15 A. Very much so, because if you look at the requirement for  
 16 OCB staff who weren't on duty, for them to come in to  
 17 the Silver command, which was a different location, then  
 18 it makes sense that they are nearby.  
 19 Q. Thank you. I won't take you to the whole of that  
 20 paragraph 7, but you go through other units and  
 21 locations.  
 22 Can I take you to paragraph 9, please:  
 23 "Control room Team 1. This is a self-contained  
 24 building located on..."  
 25 And again, as one presumes from your last answer, in

1 Greater Manchester?  
 2 A. Yes.  
 3 Q. "... within the GMP complex. It housed the command and  
 4 control operators for GMP."  
 5 And the districts you refer to:  
 6 "Managers for command and control were based at..."  
 7 Again, Greater Manchester?  
 8 A. Yes.  
 9 Q. "... along with the force duty officer, force duty  
 10 supervisor, Team 3 staff, which included force-wide  
 11 radio Talk Group operators (also known as [blank]  
 12 force-wide resource Talk Group) and the Information  
 13 Management Unit. Within the room were a number of  
 14 supervisors who held responsibility for supervising  
 15 staff covering various radio Talk Groups.  
 16 "In 2017, OCB had a minimum of a south area  
 17 supervisor, or SAS, who covered the A and E districts."  
 18 And the other districts are described:  
 19 "The room held additional space for further  
 20 supervisors for times of increased demand or overlap  
 21 shifts. There were 12 primary radio Talk Groups (not  
 22 including Team 3)."  
 23 Again, a significant corps, if I can put it that way  
 24 to you, Mr Sexton, of trained, experienced and able  
 25 people?

1 A. Everyone who works in there is, yes.  
 2 Q. Knew what their jobs were, didn't necessarily need any  
 3 sort of prompt cards or anything like that, knew what  
 4 their jobs were, and could immediately sweep into action  
 5 efficiently? Would you agree with that?  
 6 A. Yes. They certainly had access to information to  
 7 support their roles on a system called Sherlock, but  
 8 yes.  
 9 Q. Thank you. Three more paragraphs. I'm not taking you  
 10 exhaustively through the document. Paragraph 10. It  
 11 reads on and it deals with control room 2. I'm not  
 12 going to keep asking you the same question, but all  
 13 located in Greater Manchester?  
 14 A. Yes.  
 15 Q. "This was purely a command and control centre and had  
 16 the command and control dispatch/radio operators for the  
 17 remaining six geographic districts. The command and  
 18 control manager for OCR was located at this control room  
 19 along with supervisors who again held responsibility for  
 20 supervising staff covering various radio channels. In  
 21 2017, OCR had a minimum of a north area supervisor  
 22 covering [the districts described]. Again, the room  
 23 held additional space for further supervisors, for times  
 24 of increased demand or overlap. At OCR there are 11  
 25 primary Talk Groups."

1 Is that right?  
 2 A. Yes.  
 3 Q. And this again was an example of how the GMP control  
 4 room was operating on the night of this tragedy?  
 5 A. Yes.  
 6 Q. And before I take us to paragraph 12, all this, would  
 7 you agree, was absolutely critical support required for  
 8 a fully functioning control room?  
 9 A. Yes.  
 10 Q. Thank you. Paragraph 12, please, this is the last  
 11 paragraph in this document:  
 12 "A building situated next to OCB1 within the same  
 13 complex. In 2017, this housed the senior leadership  
 14 team and the hub which comprised administration staff  
 15 and a team responsible for planning staff duties known  
 16 as the Resource Management Unit. Also based within this  
 17 complex was a small unit of the CEU staff..."  
 18 I've just had a mental block. What is CEU again?  
 19 A. I don't know what the acronym is, but it's call  
 20 handlers.  
 21 Q. Thank you:  
 22 "... who tended to work day shifts from Monday to  
 23 Friday as well as the Crime Recording Unit, along with  
 24 their supervisors."  
 25 Again, critical personnel, all located locally, who

1 could liaise and communicate with each other during any  
 2 critical events such as the one that we're dealing with,  
 3 would you agree?  
 4 A. Not in entirety. The majority of the personnel that  
 5 you've mentioned there would only work office hours.  
 6 Q. I see. All right.  
 7 Can I take you, please, to your Kerslake interview  
 8 on the same point, which is {INQ023523T/53}, please.  
 9 Just the bottom of page 53.  
 10 It's on the same issue of the control room. At the  
 11 bottom we see the introduction:  
 12 "Are you part of a separate call — handling department  
 13 or do you come under uniformed ops? What does the  
 14 family tree look like for the control room?"  
 15 And {INQ023523T/54}, please. Then you say this:  
 16 "It's Operational Command Unit is the heading so  
 17 we've got our own SLT. Anything to do with command and  
 18 control through the radio system is within our own  
 19 branch. My responsibility or the force duty officer  
 20 role responsibility, as I say — although we work within  
 21 teams on a regular basis, our key role is — we don't  
 22 have a team but we have that management of all those  
 23 critical incidents.  
 24 "The force duty officer in this force is known as  
 25 the guru for anything. So regardless of what level —

81

1 and I've had the chief ring me up on things before,  
 2 'Dale, where are we at with this? What's the guidance  
 3 on this?' So we're supposed to know everything but we  
 4 don't, but we have a very, very good idea. We have  
 5 a very good idea of where to get the answer from. And  
 6 so if anything, it's a very important role because  
 7 anyone who doesn't know anything, regardless of what  
 8 area of policing they're in, will ring the force duty  
 9 officer."  
 10 Just go to {INQ023523T/55}, if you will, Mr Lopez.  
 11 And further discussion, no need to take you to that.  
 12 The force duty officer's in the control room;  
 13 is that right?  
 14 A. Sorry?  
 15 Q. The force duty officer, is he or she in the control  
 16 room?  
 17 A. Yes.  
 18 Q. Would you say it is critical that the force duty  
 19 officer, whoever he or she may be, is in the control  
 20 room?  
 21 A. Yes.  
 22 Q. For some of the reasons you expressed in Kerslake — and  
 23 would you like to elaborate as to why it is critical  
 24 a force duty officer should be in the control room?  
 25 A. Obviously, there's more than one control room, as

82

1 we have discussed, but always in GMP and the force duty  
 2 officer can only be in one, but the one that we're  
 3 situated in tends to be with the more demanding  
 4 divisions. So being in the room, first of all, you have  
 5 the ability to quickly assess and before anything is  
 6 switched through to you, when something is developing on  
 7 a specific area, one of the key areas, but you have that  
 8 immediate access to some support, which is — whether  
 9 through the supervisors or certainly one of the radio  
 10 teams that we work very closely with. So it just makes  
 11 sense to be in the same location.  
 12 Q. You're also assisted, are you not, in the control room  
 13 by the force duty supervisor?  
 14 A. Who sits beside the FDO, yes.  
 15 Q. And in short again, in what way does the force duty  
 16 supervisor assist or maybe take pressure off the FDO?  
 17 A. The force duty supervisors in the main are very  
 18 experienced, and their role and support that they can  
 19 offer the FDO during times of significant demand is  
 20 significant. Because of their experience, as I think  
 21 I've mentioned already, it's not uncommon for them to  
 22 have instigated something before you've asked them,  
 23 knowing that you were going to ask them. So it is about  
 24 that, taking that pressure and the demand and assisting  
 25 the FDO when there is a significant increase in demand.

83

1 Q. Remind me, who was the force duty supervisor on the  
 2 night of the 22nd?  
 3 A. Initially it was Ian Randall, and then I released him  
 4 and PS Andrew Core took over from him.  
 5 Q. Would you say that on the night you were assisted ably  
 6 or not by those two individuals?  
 7 A. Absolutely, they were essential.  
 8 Q. Still dealing with the functioning in general at the  
 9 moment of the control room, if you understand, so as far  
 10 as the — in general, not on the night but one presumes  
 11 it carried through to the night, as far as in general  
 12 a GMP control room will receive 999 calls?  
 13 A. Not directly into the control room. Initially it will  
 14 go through to the call handlers who take that, but yes.  
 15 Q. But there would be a bank of people deciding what to  
 16 deploy and what the priorities were?  
 17 A. That would get switched over from the call handlers to  
 18 the radio operators for the specific area that the  
 19 incident refers to, who will then make a decision on  
 20 allocation of resources to it.  
 21 Q. All experienced people in handling these matters?  
 22 A. Yes.  
 23 Q. That there would be supervisory checks on all their  
 24 work?  
 25 A. Yes.

84

1 Q. There would be reviews, constant reviews, of deployment  
2 decisions and things like that?  
3 A. Yes.  
4 Q. All this happening within the control room?  
5 A. Yes.  
6 Q. And there's an FDO in the control room giving a steer,  
7 for want of a better expression, as far as response is  
8 concerned -- I'm not dealing whether it's the right or  
9 wrong steer at the moment, you've been asked a lot of  
10 questions about that, I'm just talking generally. But  
11 there's an FDO in the control room who's there to  
12 respond to significant moments in an event, particularly  
13 a catastrophic event, there and then in the control  
14 room?  
15 A. Yes.  
16 Q. So as far as the general set-up of the GMP control room,  
17 just taking the personalities out of it for the moment,  
18 it's a very sophisticated arrangement, isn't it?  
19 A. Yes.  
20 Q. It is predicated, is it not, upon experienced and  
21 quality-led decision-making or should be?  
22 A. Yes.  
23 Q. Nothing to do with scripts or anything like that, but  
24 direct, experienced people in the control room, locally,  
25 doing their job?

85

1 A. Yes.  
2 Q. Thank you.  
3 SIR JOHN SAUNDERS: I think I've got the message.  
4 MR COOPER: I'm moving on.  
5 SIR JOHN SAUNDERS: Thank you.  
6 MR COOPER: You've been asked a lot of questions, Mr Sexton,  
7 on Plato and JESIP and I promise you, I'm not going to  
8 go all over them again. I just want to maybe top and  
9 tail a few matters.  
10 So far as JESIP is concerned, from the evidence that  
11 you've given, JESIP was, in the early, critical stages,  
12 bound to fail; do I understand that correctly?  
13 A. Did I use the words bound to fail?  
14 Q. I'm not saying you did, but I'm putting it to you and  
15 trying to bring things together, if I can.  
16 In the early stages, it was bound to fail or be  
17 ineffective?  
18 A. I think ineffective would be more appropriate.  
19 Q. All right. The tragic incident, and I choose my words  
20 very carefully, that we are dealing with, which caused  
21 the tragic loss of life, was of itself a single-action  
22 terrorist incident, wasn't it? A single individual with  
23 a single bomb criminally and murderously detonating that  
24 bomb, but it was a single action act of terrorism,  
25 wasn't it, if you see what I mean?

86

1 A. Yes.  
2 Q. It wasn't a -- tragic though it was and the loss of life  
3 it cruelly took, it was different in that respect, say  
4 to Mumbai or to Bataclan?  
5 A. Yes.  
6 Q. And yet for that single-action terrorist incident,  
7 without, if I may put it, choosing my words carefully  
8 here, the complexities of, say, Bataclan or Mumbai or  
9 others, still JESIP was ineffective in those early  
10 critical moments for such a single-action linear  
11 incident. It was still ineffective. That's what you're  
12 saying, is it?  
13 A. Yes. However, I would like to add that it is -- with  
14 hindsight, it was one horrendous incident and if that  
15 had been known on the night, it would have been  
16 a completely different matter, the way it was policed.  
17 So I think that if on the night we had known or I'd  
18 known that it was one incident that was over and done  
19 with, then that would have taken the ITFC role out of  
20 the picture and then JESIP would have had more of  
21 a chance to succeed.  
22 However, what complicated it was the constant change  
23 of threat and information that was coming in. And those  
24 two points together meant that it was never going to  
25 work straight off, no.

87

1 Q. Very sadly, the scenario you have just given the chair  
2 is a scenario that almost certainly would happen in any  
3 terrorist atrocity, wouldn't it, even if it was that  
4 single incident, there would still be those  
5 uncertainties, wouldn't there, at the beginning of most,  
6 if all (sic), terrorist atrocities?  
7 A. That would be that uncertainty, but for the... If it  
8 was one incident and didn't involve any firearms aspect  
9 to it and any ongoing risk, other than there's  
10 a potential, as there is with any, then it wouldn't have  
11 been declared as a terrorist act -- sorry, as an  
12 Operation Plato and therefore the pressures that were on  
13 the ITFC would not exist.  
14 SIR JOHN SAUNDERS: So you're saying JESIP cannot work until  
15 you are satisfied that the attack is over?  
16 A. In my opinion, sir, yes. In its entirety. There can be  
17 aspects of it, such as the RVP and FCP that can come  
18 into play. But other than that, I think it's very  
19 difficult in those early stages to actually run any kind  
20 of -- follow any kind of meaningful JESIP plan.  
21 MR COOPER: So on the matter the chair put to you, would you  
22 accept from me that in virtually all terrorist attacks  
23 in their first phase, you cannot be sure that it is over  
24 immediately, can you?  
25 A. Absolutely.

88

1 Q. So really just boiling this down to a stark sentence, is  
 2 it the case that JESIP is bound to fail in the early  
 3 period of any terrorist attack? Bound to fail in any  
 4 terrorist attack in the early period?  
 5 A. There is a high probability that that would be the case,  
 6 yes.  
 7 Q. So we have a document here, and we've dealt with it in  
 8 terms of its use, its principles and what it aspires to,  
 9 but we presently have a document, do we, at the moment,  
 10 which is bound to fail in the early period of any  
 11 terrorist attack?  
 12 SIR JOHN SAUNDERS: Okay, that's your evidence?  
 13 A. Yes, yes.  
 14 MR COOPER: Can I take you, please, to Plato. Again, I'm  
 15 not going to repeat matters ably and already put to you.  
 16 I just want to understand a few matters. I'm trying to  
 17 bring the evidence you've given orally together as well.  
 18 Looking at the evidence you gave yesterday, and for  
 19 those that want to look at it, it's page 57, it's only  
 20 two lines, I can read them to you, you said this:  
 21 "... after [and I'm emphasising your words] I'd  
 22 declared Operation Plato, that's when I understood the  
 23 implications of it." {Day98/58:19}  
 24 That's your evidence yesterday:  
 25 "... after I declared Operation Plato, that's when

1 I understood the implications of it."  
 2 Should you have perhaps thought before you declared  
 3 Operation Plato what the implications may be of it?  
 4 A. I think the way that you've read it out or the way that  
 5 I've explained it might have been a poor choice of  
 6 words. I knew exactly prior to the attack what the  
 7 implications of declaring Plato were in that of the  
 8 location of various resources in the various zones.  
 9 SIR JOHN SAUNDERS: Can I just stop you? I think I do  
 10 understand what you're saying. You declared Plato  
 11 because you think it's the right thing to do in the  
 12 circumstances, then you think to yourself the  
 13 consequence of this may be that rescuers are taken out  
 14 of the City Room and you wanted to avoid that because  
 15 it'll lead to loss of life?  
 16 A. Yes.  
 17 SIR JOHN SAUNDERS: That's how I understand it; is that  
 18 right?  
 19 A. That's exactly right, sir.  
 20 MR COOPER: I will reference the document I'm referring to  
 21 on the same point, it's from your dictaphone transcript,  
 22 and if reference of it and visualisation of it will  
 23 help, it's {INQ024325/15}.  
 24 It's opposite time 23.14.00. You say this -- it has  
 25 been touched upon but I just want to put things into

1 context a little :  
 2 "I think we've got the scene itself reasonably safe  
 3 at this moment in time."  
 4 And then on page --  
 5 SIR JOHN SAUNDERS: Do you mind? In order to get the  
 6 context, we don't know who you're talking to. Would  
 7 I be right in thinking it's someone concerned with  
 8 firearms?  
 9 A. Yes.  
 10 SIR JOHN SAUNDERS: And maybe getting more in?  
 11 A. Yes.  
 12 SIR JOHN SAUNDERS: Thank you.  
 13 MR COOPER: Thank you.  
 14 {INQ024325/38}, please. That reference I made to  
 15 you was 23.14.00. At the top of this page, are you  
 16 effectively saying there that fire do not need to go to  
 17 the scene?  
 18 A. Yes.  
 19 Q. And then moments later, the next block within the same  
 20 23.55 category:  
 21 "So what I got off your sergeant there was, first  
 22 call ... 18 fatalities, 20 injured, police channel,  
 23 that's all we've got..."  
 24 Putting those two entries together, because they're  
 25 starkly one after the other, when you came to the view

1 that fire did not need to go to the scene, was that,  
 2 despite knowing of those, from what you'd been told, of  
 3 the 18 fatalities and, what you'd been told, 20 injured?  
 4 A. Yes, because I still believed, and I've said that in my  
 5 previous entry there about reasonably secure, that there  
 6 was an ongoing threat at that location.  
 7 Q. I'm not criticising you, I'm just trying to dig a little  
 8 deeper into your thought processes. So at that stage,  
 9 as articulated at {INQ024352/38}, you're aware of the  
 10 serious harm that had been caused to people and there  
 11 were some people suffering there?  
 12 A. Yes.  
 13 Q. But you took the view that fire did not need to go to  
 14 the scene?  
 15 A. Yes.  
 16 Q. Why, given the juxtaposition of those two facts and what  
 17 you've told the learned chair that your priority was to  
 18 save lives and help people?  
 19 A. Yes, and as I said yesterday, it was a difficult  
 20 decision, but I believed that I had a true and real  
 21 threat still at that scene. I already had unarmed  
 22 resources there, unarmed members of the public.  
 23 Q. You had resources what, I'm sorry? I missed that.  
 24 A. There at the location.  
 25 Q. You mentioned members of the public.



1 A. And members of the public.  
 2 Q. I don't mean to interrupt you and please hold on to your  
 3 thought, but it really isn't the responsibility of  
 4 members of the public to be boosting the emergency  
 5 services, is it?  
 6 A. That's not the point I was making.  
 7 Q. Forgive me, please carry on.  
 8 A. The point I was making was that I had numerous unarmed  
 9 personnel, people, members of the public, at that  
 10 location that were at risk of the potential and real  
 11 ongoing threat that I believed was posed to that area.  
 12 I didn't want to add more unarmed resources into that  
 13 location that my firearms teams would have had to put  
 14 protection on. And I accept that it's not the members  
 15 of the public's responsibility to provide medical  
 16 treatment, but that wasn't the point I was making.  
 17 Q. That's fair. And you're aware at the time that the Fire  
 18 Service did have protective clothing, protective gear  
 19 they could wear and indeed carried things, such as  
 20 stretchers or devices like that, that could have  
 21 assisted people that needed moving urgently?  
 22 A. Absolutely, if my view was that that location still  
 23 wasn't in my mind a hot zone. In a warm zone, then  
 24 those specialist resources could have been deployed,  
 25 yes.

1 Q. Because you understand a number of individuals were  
 2 carried out of that arena on things like cardboard  
 3 hoardings and metal railings?  
 4 A. Yes, unfortunately.  
 5 Q. And had the Fire Service or the Ambulance Service, or  
 6 indeed those that manage the arena, got enough  
 7 stretchers, that probably wouldn't have happened?  
 8 A. Yes, and I'd say that if my belief that there was an  
 9 ongoing threat wasn't at the level it was, then  
 10 undoubtedly I would have deployed the Fire Service to  
 11 assist.  
 12 Q. The reference I gave you a moment ago at 23.14 hours,  
 13 where you indicate:  
 14 "I think we have the scene itself reasonably safe."  
 15 To the reference I gave you also at {INQ02435/38}  
 16 that fire did not need to go to the scene for the  
 17 reasons you have expressed, what changed between those  
 18 two references in your dictaphone?  
 19 A. Sorry, can you give me the times?  
 20 Q. By all means. Reference 23.14 hours, which is  
 21 {INQ02435/15} of your dictaphone transcript, where you  
 22 say:  
 23 "I think we've got the scene itself reasonably safe  
 24 at the moment in time."  
 25 And then if you bring up, again, please, Mr Lopez,

1 {INQ024325/38} of the same document where you say fire  
 2 do not need to go to the scene and we see that's around  
 3 about 23.55, around about 23.54/23.55.  
 4 So what changed between 23.14 and, say, 23.53?  
 5 A. I think at 23.16, some more information came out about  
 6 a second male. Now, I know that wasn't directly at the  
 7 scene, but I would presume that I didn't have a full  
 8 understanding of where this second offender potentially  
 9 might be.  
 10 And then as we're moving on, a potential -- I think  
 11 a suspect package as well, if I have my timings right,  
 12 came in within that period. So leading up just after  
 13 11 o'clock I'm starting to think that the threat is  
 14 reducing and new information comes in which then shoots  
 15 the threat level back up again.  
 16 Q. You've rightly prefaced your answer to me in relation to  
 17 the second male not being at the scene. We've already  
 18 dealt with that, the second male wasn't at the scene.  
 19 As far as suspect packages are concerned, that was  
 20 a matter of concern before 23.14, wasn't it?  
 21 A. Yes, the other obvious threat that was still remaining  
 22 because we hadn't sent an explosives dog into the scene  
 23 was the actual scene itself with packages.  
 24 Q. You hadn't had an explosives dog at the scene before  
 25 23.14, had you?

1 A. No.  
 2 Q. So what I'm suggesting to you is that when you made your  
 3 remarks at 23.14 hours, that:  
 4 "We've got the scene itself reasonably safe at this  
 5 moment in time."  
 6 Nothing of significance had really changed between  
 7 then and your reference at {INQ02435/38} that fire did  
 8 not need to go to the scene. Nothing of really great  
 9 significance in the City Room had changed, had it?  
 10 A. I would think that if that other information hadn't come  
 11 in at just after 11.15, and I had believed that there  
 12 was no further threat regardless of the location of that  
 13 threat, I possibly would have deployed the Fire Service  
 14 or certainly made contact or attempted to make contact  
 15 with the Fire Service. But I can only presume that with  
 16 the report -- bearing in mind the significant amount of  
 17 demand that was being placed on my time and information  
 18 I was trying to process, the fact that a second offender  
 19 had been identified at 23.16 has obviously taken my eye  
 20 off the ball to that extent and took my concentration  
 21 elsewhere.  
 22 SIR JOHN SAUNDERS: There are three alternatives, it seems  
 23 to me. First of all, what you are saying is that you  
 24 made an absolute decision that it is just not safe for  
 25 them to go. Secondly, that you didn't appreciate fully

1 what the Fire Service could do in that situation .  
 2 Thirdly, that it's just actually part of the  
 3 overwhelming effect of the night that you weren't  
 4 actually necessarily making the right decisions. And  
 5 you say it's definitely 1, as I understand it.  
 6 A. It's definitely 1. It was a definite decision and  
 7 I fully understood what their capability was.  
 8 SIR JOHN SAUNDERS: Mr Cooper, are there other alternatives?  
 9 MR COOPER: No, those indeed are the three alternatives.  
 10 I'm really focusing again on this overwhelming matter so  
 11 far as I may --  
 12 SIR JOHN SAUNDERS: We've had a lot of people trying to  
 13 (overspeaking) him with that.  
 14 MR COOPER: I know and I don't want the officer to think  
 15 he's some form of faceless individual we're trying to  
 16 get a concession from, we're not. We just want to try  
 17 and dig down into what was happening at the time.  
 18 You're an experienced officer .  
 19 A. Yes.  
 20 Q. We've seen your qualifications, your impressive  
 21 qualifications . Whilst you may not have handled  
 22 something as catastrophic as 22 May, you've handled some  
 23 pretty significant incidents, haven't you?  
 24 A. Yes.  
 25 Q. You are not normally the sort of man in the past, are

1 you, that's made any wrong decision or critically wrong  
 2 decision in any of those incidents?  
 3 A. Certainly not that I'm aware of.  
 4 Q. No, and one presumes -- and your record is impeccable on  
 5 that subject?  
 6 A. Yes.  
 7 Q. And nothing but a man -- as you said yourself, I think  
 8 right at the start of your evidence, one of your  
 9 attributes is being calm and considered under pressure.  
 10 A. Yes.  
 11 Q. So what happened on the night of the 22nd was totally  
 12 out of character perhaps for you in terms of perhaps  
 13 making decisions which were questionable?  
 14 A. No, I disagree. The decisions I made were based on the  
 15 information and intelligence I had at the time. Without  
 16 doubt, the demand that was placed on the FDO role, and  
 17 therefore on me, I've never experienced before in any  
 18 role I've done. However, the initial decisions I made  
 19 about not wanting to inform the other services was, as  
 20 I've said, a deliberate decision and that was carried  
 21 out early in the incident.  
 22 What I did say yesterday or on the first day was  
 23 that potentially, as we got to more slow time and the  
 24 threat was dispersing, that's an opportunity for me to  
 25 reconsider at that point whether or not I should

1 reconsider my original decision. But then, with the  
 2 influx of more information which heightened the risk  
 3 again, it's something that I didn't really therefore  
 4 give much more consideration to.  
 5 Q. You've accepted, and I won't go through them, and fairly  
 6 accepted when it's due, mistakes that you made or  
 7 actions that you took, which, with hindsight, you  
 8 shouldn't have done. You've done that. Even in the  
 9 instances where you have accepted those mistakes,  
 10 they're not the sort of mistakes you usually make, are  
 11 they, in your professional life ?  
 12 A. No.  
 13 Q. No. The references I put to you a moment ago, and I put  
 14 the question to you that there were no significant  
 15 changes, and the chair put three permutations as to your  
 16 thought processes, you were simply overwhelmed, weren't  
 17 you?  
 18 A. There's no doubt that I was overwhelmed, but that didn't  
 19 affect certain decisions that I made.  
 20 Q. Do we have at least this, and you understand I'm asking  
 21 questions, as are the three of us, on behalf of the  
 22 families. We are not looking for a scapegoat. Far from  
 23 it. I don't want you to get that impression. Far from  
 24 it. We are not looking for a scapegoat. Quite the  
 25 contrary. Quite the contrary.

1 Because of what was happening on the night, although  
 2 you stand by your decisions, or some of them, you do  
 3 accept nonetheless those decisions were made whilst you  
 4 were overwhelmed?  
 5 A. Yes.  
 6 Q. And your position is now that you are of the view, and  
 7 it is perfectly your prerogative to be of that view,  
 8 your position now is that, "Although I was overwhelmed,  
 9 I back my decisions"?  
 10 A. Yes.  
 11 Q. Thank you. Just a few more matters. Again, it concerns  
 12 an aspect that you've already been taken to, and these  
 13 are new questions, and it's on the active shooter and  
 14 whether the element of active shooter was in the front  
 15 of your mind.  
 16 In your Kerslake at page 41 you say this:  
 17 "Operation Plato is very much sold on a marauding  
 18 terrorist firearms attack. I mean, that's what it is,  
 19 MTFA."  
 20 That's page 41 {INQ023523T/41}. And you stand by  
 21 that, I presume?  
 22 A. Yes.  
 23 Q. It's clear. Looking at your dictaphone transcript, and  
 24 we've looked at it carefully, as you'll anticipate, you  
 25 repeatedly and exclusively refer to Operation Plato as

1 signifying a terrorist incident. That's the expression  
 2 you use.  
 3 A. Yes.  
 4 Q. There's one difference, and I'll fairly take you to that  
 5 in a moment, but substantially throughout the whole of  
 6 that document you refer to it as a terrorist incident  
 7 and not limited to an active shooter or a marauding  
 8 firearms terrorist attack, you used terrorist incident.  
 9 I'm conscious of time, so I'm just going to make  
 10 references that may or may not assist the chair without  
 11 taking you to them -- I'm going to read them in if  
 12 I can -- where on each occasion, when you're discussing  
 13 the development of this catastrophe, you refer to the  
 14 matter as a terrorist incident as opposed to something  
 15 else.  
 16 That's at: {INQ02435/1} at 0:55; {INQ02435/4} at  
 17 04:17; {INQ02435/12} at 19:02; {INQ02435/13} at 20:56;  
 18 {INQ02435/14} at 24:02; {INQ02435/15} at 26:16;  
 19 {INQ02435/16} at 28:29; and finally at {INQ02435/35} at  
 20 1:01:46.  
 21 You can take it from me, we've carefully checked  
 22 this, that's where you refer to the matter as  
 23 a terrorist incident. There is a single occasion on  
 24 which you seem to begin to mention Plato as being  
 25 limited to a marauding attack, you've been referred to

1 it already --  
 2 A. Yes.  
 3 Q. -- but you correct itself, so it seems, and you revert  
 4 to terrorist attack. And that's at {INQ02435/15} at  
 5 25:26.  
 6 You're an experienced officer. Why was it that on  
 7 numerous occasions, not just one occasion, but on  
 8 numerous occasions on your dictaphone transcript you  
 9 only refer to the incident that initiated Plato as  
 10 a terrorist incident? Why weren't you more specific,  
 11 knowing full well as an experienced officer the  
 12 parameters of Plato?  
 13 A. I think the people that I was talking to at the time --  
 14 for me, it's quite simple, this -- is that by the time  
 15 I start saying an MTFA terrorist attack, "What's an  
 16 MTFA?", I have to go and explain what an MTFA is. They  
 17 didn't need to know that with the majority of people  
 18 that we're referring to. All they needed to know was  
 19 it's a terrorist attack. I knew I was dealing with  
 20 an MTFA because even just that single entry about  
 21 marauding, that's where I knew -- I had decided the  
 22 explanation I was giving was it is a terrorist attack.  
 23 It is a quick way to inform, give an overview of the  
 24 actual main aspect of the incident that we're dealing  
 25 with.

1 Q. It wouldn't have taken much to have said marauding  
 2 terrorist or firearm or gun, would it?  
 3 A. I think it would have done by the time I've explained to  
 4 people -- how many times did I reference it, six, seven  
 5 times?  
 6 Q. Yes. I can give you them again --  
 7 A. It's okay, I don't need that --  
 8 Q. I can count them: nine times.  
 9 A. That's nine times I would potentially have had to  
 10 explain what an MTFA was. It as much easier -- it was a  
 11 decision I made and it most probably wasn't a conscious  
 12 decision, but a terrorist attack is a terrorist attack.  
 13 The intricacies of that terrorist attack are only  
 14 relevant to certain people.  
 15 Q. Could it be that by referring to it as being a marauding  
 16 terrorist attack or mentioning firearms might alert  
 17 people to the fact that Plato should have been declared?  
 18 A. No, I don't think that's... I don't think that was the  
 19 rationale.  
 20 Q. You don't think it was?  
 21 A. I can't say for definite, but I certainly am not... I'm  
 22 not... I haven't got that in my mind that that's why  
 23 I did it, no.  
 24 Q. I'm conscious you've been asked a lot about it, I'm not  
 25 going to pile in with other questions you've been asked,

1 but that aspect will be linked in the chair's mind to  
 2 all the other evidence he's heard.  
 3 Threat levels. You have been asked about those as  
 4 to what the threat levels were at the time. It's  
 5 a specific question I want to ask you on this, though.  
 6 You indicated, it seems a long time back now, Mr Sexton,  
 7 in your evidence, that as far as the Ariana Grande  
 8 concert was concerned, you did not consider this to be  
 9 a specific GMP matter; is that right?  
 10 A. That's correct, yes.  
 11 Q. And why was that?  
 12 A. I think I explained on day 1, that any events within the  
 13 arena always came under the footprint and responsibility  
 14 of BTP. The only involvement that we would want is the  
 15 impact that that potentially would have, either pre or  
 16 post event, with disorder within the city centre.  
 17 Q. Was it based on funding?  
 18 A. Absolutely... Well, you'd need to ask someone higher  
 19 than me on that one, but certainly, no, I'm not aware of  
 20 funding coming into it at all --  
 21 Q. I'm only asking you because you were force level project  
 22 leadership, weren't you, on the response to GMP's  
 23 austerity measures?  
 24 A. Yes, in 2008.  
 25 Q. I'm only asking you that question -- that's in your

1 statement, {INQ029021/3}, paragraph 9, you were the  
 2 force level project leader tasked with reshaping the  
 3 response of GMP in relation to austerity measures in  
 4 policing initiated in 2008. So you were very conscious,  
 5 were you not, on the cutbacks to the police as a result  
 6 of austerity measures, weren't you?  
 7 A. Absolutely, yes.  
 8 SIR JOHN SAUNDERS: Would you have been responsible for  
 9 deciding whether GMP officers should go and be at or  
 10 outside the Ariana Grande concert?  
 11 A. No, sir.  
 12 MR COOPER: Are you aware that perhaps the approach taken by  
 13 GMP to policing concerts such as the Ariana Grande  
 14 concert, which were considered low-level security, we  
 15 won't go into the national security level, the inquiry  
 16 is well appraised of that, but was, perhaps from your  
 17 experience in dealing with austerity cuts on the  
 18 police — could you say whether the attitude of GMP to  
 19 policing low-level concerts — assumed — such as  
 20 Ariana Grande were linked in to having to save money on  
 21 policing?  
 22 A. No, not directly. I think because of policing resources  
 23 and the levels of policing resources, everything we do  
 24 has to be scrutinised and justified. If they had ever  
 25 believed there to be a threat of any kind that GMP would

105

1 become involved in then I'm more than sure that the  
 2 senior leadership team for the city centre would have  
 3 put a policing response to it. So I disagree with the  
 4 suggestion that we don't police the arena for low-level  
 5 events because of austerity.  
 6 SIR JOHN SAUNDERS: Okay, so Mr Cooper, we've heard about  
 7 austerity cuts affecting the police response in other  
 8 ways. And you're perfectly entitled to ask the  
 9 question, but there's nothing to suggest it in this  
 10 particular aspect of this inquiry at the moment.  
 11 MR COOPER: I'll move on.  
 12 SIR JOHN SAUNDERS: Thank you.  
 13 MR COOPER: This is my last question. In your Kerslake  
 14 interview, if I can take you, please, to page 70  
 15 {INQ023523T/70} of that.  
 16 SIR JOHN SAUNDERS: While you're just finding that  
 17 reference, you have told us that you were in effect  
 18 unprepared for Kerslake.  
 19 A. Yes.  
 20 SIR JOHN SAUNDERS: Why was that, bearing in mind it was  
 21 a rather important inquiry? I know it was very quickly  
 22 after the attack, but if Kerslake was actually going to  
 23 be meaningful, it needed for people to be prepared,  
 24 didn't it?  
 25 A. Yes. The only preparation that I undertook was

106

1 I listened through my dictaphone prior to giving the —  
 2 which is what you've heard.  
 3 SIR JOHN SAUNDERS: There's been a great deal of preparation  
 4 as I'm well aware and grateful for, for this inquiry,  
 5 and it seems to be quite a contrast between the  
 6 preparation for this and the preparation for Kerslake.  
 7 A. Yes, sir.  
 8 SIR JOHN SAUNDERS: I'm not saying that Kerslake is not  
 9 a very valuable piece of work, so please don't anyone  
 10 take that wrongly, but it seems a bit surprising that  
 11 there's such a difference.  
 12 A. Yes, sir.  
 13 MR COOPER: Page 70, Mr Lopez. {INQ023523T/70}.  
 14 I want to ask you, Mr Sexton, what you meant by  
 15 something you said. You say this:  
 16 "I feel I was under a lot of pressure and I felt it  
 17 and, you know it's — I don't want to be put in that  
 18 position again. I am not sure I will now. I will do  
 19 the best I can."  
 20 I want to dig a little deeper on that, what might be  
 21 a telling observation, right at the end of the Kerslake  
 22 interview, wasn't it, more or less anyway?  
 23 "I was under a lot of pressure and I felt it."  
 24 You stand by that now; is that right?  
 25 A. That's what I have said, yes.

107

1 Q. "I don't want to be put in that position again."  
 2 What can be done to ensure, so far as you are able  
 3 to give evidence on this, what can you do to ensure  
 4 that you're not or your colleagues in the future are not  
 5 put in that position again?  
 6 A. I think GMP has gone — has made leaps and bounds  
 7 towards giving that support to the FDO. I don't know if  
 8 you want me to explain the current — the new layout,  
 9 but it's —  
 10 Q. I'm with Mr Greaney and the chair, we're working — just  
 11 so I can see that. I haven't seen it, that's no  
 12 criticism, so I think it's best to leave that for the  
 13 time being, but you'll help, I know, the inquiry in due  
 14 course.  
 15 So is the answer to my question involving you  
 16 referring to what I'm referring to as New Plato?  
 17 A. Not just New Plato.  
 18 Q. Then outside of that, providing that you or the  
 19 inquiry —  
 20 SIR JOHN SAUNDERS: You're talking about the new assistance  
 21 which has been given to the FDO in the control room —  
 22 A. Exactly, sir.  
 23 SIR JOHN SAUNDERS: — and the fact that the different roles  
 24 are now separated off; is that what we're talking about.  
 25 A. Yes, very much so.

108

1 SIR JOHN SAUNDERS: Sorry, Mr Cooper, to cut you off.  
 2 MR COOPER: That's very helpful, sir. I just don't know how  
 3 far to press it.  
 4 A. You can stop me when you want.  
 5 MR COOPER: It's not for me to stop you.  
 6 SIR JOHN SAUNDERS: I will.  
 7 A. Sorry, sir, yes.  
 8 Prior to and post incident, the FDO had very little  
 9 support other than from the FDS, and there'd not really  
 10 been an incident prior to that which had such a  
 11 significant impact on the role and the performing of  
 12 that role. Since then, the location of the FDO, in fact  
 13 communications have changed, where there's a lot more  
 14 support directly at hand. The introduction of an  
 15 assistant FDO, which is an inspector, another inspector  
 16 who is there to give the FDO assistance. And sat two  
 17 desks away is my role, the force critical incident  
 18 manager, who is there to manage firearms incidents, even  
 19 from the early stages, from the spontaneous side, and  
 20 also to manage critical incidents, which relieves that  
 21 pressure from the FDO to get on with the more day-to-day  
 22 stuff, but also to then assist the force critical  
 23 incident manager in moving towards the JESIP principles  
 24 and the implementation of those.  
 25 SIR JOHN SAUNDERS: Okay, just answer me this, please. Has

109

1 it been tested with a full-scale rehearsal?  
 2 A. No.  
 3 SIR JOHN SAUNDERS: Everyone thought it was going to work  
 4 before.  
 5 A. Sir, from my professional experience, the support  
 6 that is now there and from my experience on the night,  
 7 it is a much better position we're in.  
 8 SIR JOHN SAUNDERS: Right, thank you.  
 9 MR COOPER: It was a question I was going to ask linked in  
 10 to the question the chair just asked you: you obviously  
 11 had these misgivings about JESIP and about Plato before  
 12 the tragedy of 22 May.  
 13 A. Yes.  
 14 Q. During all the training and communications you had about  
 15 the matter, whether it be Winchester Accord or any other  
 16 accord or any other training exercise, did you ever  
 17 voice your concerns, the ones that you profoundly voice  
 18 at this inquiry, did you ever voice those same concerns  
 19 in abstract, obviously, to others?  
 20 A. I certainly would have voiced various concerns around  
 21 the demands on the FDO during major incidents or even  
 22 terrorist-type incidents. I can't say who that was  
 23 specifically to. Did I do it to the senior leadership  
 24 team? No, I didn't believe it was necessary because my  
 25 senior leader at the time, Chief Inspector Booth, was

110

1 a very much a very experienced FDO in his previous  
 2 role --  
 3 SIR JOHN SAUNDERS: Again, let me cut you off, if I may, and  
 4 suggest an answer: you actually did your aide-memoire,  
 5 anyone who reads the aide-memoire and sees, "Do the best  
 6 you can", and realises you're going to be overwhelmed  
 7 doing it would realise there's a pretty clear criticism  
 8 of the present system in there.  
 9 A. Yes, sir.  
 10 MR COOPER: Again, following on the back of that question,  
 11 we have New Plato, I'm not going to go into it. You're  
 12 one of only a couple of individuals that have had to  
 13 declare Operation Plato. What communications or  
 14 consultations have there been with you in the building  
 15 and constructing of New Plato?  
 16 A. I have been involved in the early stages of New Plato  
 17 and the development of it.  
 18 SIR JOHN SAUNDERS: And your feedback on what happened will  
 19 have been taken into account?  
 20 A. Yes, very much so.  
 21 MR COOPER: The expression you used in what I showed you  
 22 a moment ago, you said:  
 23 "I don't want to be put in that position again."  
 24 And then you say this:  
 25 "And I'm not sure I will now."

111

1 What did you mean by that?  
 2 A. Absolutely no idea.  
 3 Q. Well, you said it.  
 4 A. I know I did, but it was 3/3.5 years ago.  
 5 Q. I understand that, but you're an intelligent man, if  
 6 I may say so, you have achieved significantly in your  
 7 chosen career, you're not a silly man, you don't use  
 8 words lightly, do you?  
 9 A. I would hope not.  
 10 Q. No. So when you say:  
 11 "I don't want to be put in that position again. I'm  
 12 not sure I will now."  
 13 What did you mean by that?  
 14 A. I honestly don't know. Would it be possible to see the  
 15 conversation after that?  
 16 SIR JOHN SAUNDERS: Mr Cooper, I have certainly had the  
 17 experience of reading through a transcript of what I've  
 18 said subsequently and not had the slightest idea what  
 19 I meant. Perhaps you've never had that unfortunate  
 20 experience.  
 21 MR COOPER: Of course we all have, sir, but an expression  
 22 such as that, "I am not sure I will now", is quite  
 23 a startling --  
 24 SIR JOHN SAUNDERS: There are a number of possibilities. It  
 25 may mean you don't want to go through it again now.

112

1 When I looked at it, that is one of the things which  
 2 occurred to me as a possibility, that you wanted to  
 3 avoid ever having to do it again.  
 4 A. That's an absolute given. I would not want to be  
 5 in that process again, but honestly I think part of the  
 6 transcript, as you read through it, it's quite  
 7 embarrassing, the grammar I've used and some sentences  
 8 which just don't run on properly. I can only presume  
 9 that it was a throwaway comment that really didn't mean  
 10 anything, but I honestly don't know what --  
 11 MR COOPER: Can I simply suggest this to you, that it was an  
 12 expression perhaps at the time, certainly nearer to the  
 13 time than we are at the moment, of accepting that you  
 14 knew you'd made mistakes and that they may not put you  
 15 in that position again, the police force may not allow  
 16 you to take that position again?  
 17 A. Absolutely not.  
 18 Q. There's one other matter that I'm going to raise the  
 19 issue -- it's a matter for you, sir, no one's asked this  
 20 officer about this very defined issue: managing visiting  
 21 resources, managing visiting resources. There is a lot  
 22 of evidence you have given us, very helpfully, about you  
 23 having to manage visiting resources. In terms of the  
 24 night itself, were you satisfied that visiting resources  
 25 were managed adequately?

113

1 A. No, not in the early stages.  
 2 Q. And why not?  
 3 A. Because I, me personally, became confused because of the  
 4 amount of resources that were coming in from various  
 5 areas. I was getting support firearms-wise from areas  
 6 who didn't need and were not nationally required to  
 7 provide support to me. They were literally coming from  
 8 all over the north of England.  
 9 SIR JOHN SAUNDERS: So the protocol which is laid down was  
 10 actually not being followed out of concern by other  
 11 forces to help you if they could?  
 12 A. Absolutely, they were doing it for the right reasons.  
 13 SIR JOHN SAUNDERS: But it doesn't always have the right  
 14 result when you do things for the right reasons.  
 15 A. No, not always, and there wasn't any -- if I'd  
 16 potentially had a loggist, you could argue, who could  
 17 jot down the details of resources that were coming in  
 18 and where I'd deployed them, but that wouldn't have been  
 19 something I could do as a commander.  
 20 SIR JOHN SAUNDERS: And actually we do hear you later on  
 21 saying:  
 22 "We actually need to have an inventory of how many  
 23 people we have got and where they have come from."  
 24 A. Yes.  
 25 SIR JOHN SAUNDERS: So this was another burden on you

114

1 because you're having to speak to them as well when  
 2 they're coming?  
 3 A. Yes.  
 4 SIR JOHN SAUNDERS: "Where do we go, what do we do?"  
 5 MR COOPER: Just to clarify that in Kerslake -- no need to  
 6 go to it, it's the top of page 74 {INQ023523T/74} -- you  
 7 say this on the matter:  
 8 "Getting visiting resources on the same mapping  
 9 system is crucial."  
 10 "Getting visiting resources on the same mapping  
 11 system is crucial."  
 12 A. Yes.  
 13 Q. And I promise this is my last question: for the reasons  
 14 the chair has just put to you or for any other reasons  
 15 you haven't mentioned why is it crucial that they are on  
 16 the same mapping system?  
 17 A. The mapping system shows exactly where each resource is  
 18 anywhere within GMP. All GMP officers come up if they  
 19 have got a handheld radio or a vehicle set radio, so  
 20 when you're looking at an area and wondering where  
 21 resources are to send to a job, you can quickly identify  
 22 them, visually identify them. It also allows for a very  
 23 quick search as well for their call sign, which would  
 24 mean that you would then know exactly where their  
 25 location was and, likewise, if they shout up and you're

115

1 unsure where they are, you can put the search in for  
 2 them and they would come up on your screen, so you know  
 3 exactly where they are within GMP.  
 4 That is not possible with visiting resources. Their  
 5 Airwave sets do not -- and it's not just unique to GMP,  
 6 it's across the country. Those identifiers do not show  
 7 up on GMP systems.  
 8 MR COOPER: Thank you, sir.  
 9 SIR JOHN SAUNDERS: Thank you, Mr Cooper.  
 10 MR GREANEY: Sir, I do have questions about one particular  
 11 topic, although a number of aspects of it, and  
 12 I consider that it's fairest that I ask those questions  
 13 before Mr Davies asks his.  
 14 SIR JOHN SAUNDERS: Is that all right by you, Mr Davies?  
 15 You're happy to keep waiting?  
 16 MR GREANEY: Sir, may I suggest that I ask my questions,  
 17 which I hope won't take much longer than 15 minutes,  
 18 that we then take just a short break at that stage, and  
 19 Mr Davies then asks his questions so that the  
 20 chief inspector's evidence can be finished before our  
 21 lunch break?  
 22 SIR JOHN SAUNDERS: Okay.  
 23 Further questions from MR GREANEY  
 24 MR GREANEY: Thank you.  
 25 Chief inspector, we know, I believe, that by

116

1 10.37 pm, you had the declaration of Operation Plato  
 2 under consideration.  
 3 A. Yes.  
 4 Q. And we know that because we looked yesterday, did we  
 5 not, at the GMP radio message that was passed at that  
 6 time about the potential for a declaration?  
 7 A. Yes.  
 8 Q. At 10.47, you actually made the declaration?  
 9 A. Yes.  
 10 Q. So it would seem to follow from that that for a period  
 11 of not less than 10 minutes you had the making of the  
 12 declaration under consideration?  
 13 A. Yes.  
 14 Q. By the stage that you made the declaration had you also  
 15 made the decision to conceal that declaration from your  
 16 emergency service partners?  
 17 A. No, not at that stage.  
 18 Q. At what stage did you make that decision?  
 19 A. I think immediately after I'd declared Op Plato, it  
 20 appeared on the FWIN, and at that point I realised the  
 21 implications of doing that.  
 22 Q. I don't want to be unfair to what you've just said. You  
 23 make the declaration at 10.47/10.48. Are we talking  
 24 about you making that connected decision not to  
 25 communicate the declaration at about 10.48 or 10.49?

117

1 A. I would think so, yes.  
 2 Q. As I'm absolutely certain you will appreciate, you have  
 3 been pressed over the course of the last 2.5 days on  
 4 whether you didn't communicate your declaration to your  
 5 emergency service partners, not through a deliberate  
 6 decision but instead through oversight because of the  
 7 pressure that you were under, and you've been very clear  
 8 and certain that that has been explored with you.  
 9 A. Yes.  
 10 Q. As you'll also know, it's been pointed out to you that  
 11 you did not consult any of your police colleagues about  
 12 your decision to conceal the declaration, you didn't  
 13 record that decision on the dictaphone, or anyone else,  
 14 and you didn't tell anyone who was in the know that they  
 15 should keep the declaration a secret from other  
 16 emergency services.  
 17 A. Yes.  
 18 Q. All of that has been pointed out to you. But it would  
 19 be a fair summary, I hope, to say that you have  
 20 maintained with some vigour that, despite all of that,  
 21 you did make a deliberate decision, having reflected on  
 22 your Article 2 obligations.  
 23 A. Yes.  
 24 Q. What I'm not going to do is to challenge the account  
 25 that you have consistently given throughout the course

118

1 of this hearing because, after all, only you know  
 2 what was in your head. What I am going to do is to draw  
 3 to your attention two particular matters and ask whether  
 4 either of them, or indeed both of them, make any  
 5 difference to your account. Does that make sense as an  
 6 approach?  
 7 A. Yes.  
 8 Q. The first of those points is this: what emerged,  
 9 certainly so far as I was concerned, it may have been  
 10 apparent to others earlier, during Mr Weatherby's  
 11 questioning, was that in the course of your Kerslake  
 12 interview you did not mention your decision to keep the  
 13 declaration secret.  
 14 A. Yes.  
 15 Q. What I want to do is just to place that piece of  
 16 evidence into a broader context. You completed, as we  
 17 established right at the beginning of my questions of  
 18 you on Tuesday -- no, Wednesday -- you completed  
 19 a debrief questionnaire as part of Operation Newtown.  
 20 A. Yes.  
 21 Q. And that, we believe, was in or about July of 2017.  
 22 In that, I know you'll take it from me, you made no  
 23 mention of the decision to keep the declaration secret,  
 24 did you?  
 25 A. Yes.

119

1 Q. You then completed another debrief as part of  
 2 Operation Manteline, and again I think that that was in  
 3 July, albeit a little later. I'm going to ask that that  
 4 be put on the screen. The reference is {INQ041168/1}.  
 5 The date is on there, 27 July 2017. Again I'm sure  
 6 you'll take it from me that in that debrief document you  
 7 made no mention of the fact that you had made a decision  
 8 to keep the declaration a secret.  
 9 A. Yes.  
 10 Q. Indeed, and moreover, not only did you not mention that  
 11 decision, but you suggested a different reason for not  
 12 having communicated with the Ambulance Service and  
 13 Greater Manchester Fire and Rescue Service. Could we go  
 14 to {INQ041168/2} of that document, please? The bottom  
 15 half of the page:  
 16 "Question: from your own role perspective what  
 17 aspects of Operation Manteline did not go well?"  
 18 "I declared Operation Plato some 20 minutes from  
 19 being made aware of the incident."  
 20 Do you see that?  
 21 A. Yes.  
 22 Q. "However, due to the demand on the FDO role and limited  
 23 experienced comms operators, I was unable to make  
 24 contact with North-west Ambulance and Greater Manchester  
 25 Fire and Rescue Service."

120

1 So the impression one gets from that is that the  
 2 reason the declaration was not communicated to your  
 3 partners was due to the demand you were under and the  
 4 limits on the experience of others within the control  
 5 room; do you agree?  
 6 A. That's how it would read.  
 7 Q. In fact, I have taken these in slightly -- in the  
 8 slightly wrong order because there was another debrief  
 9 that you took part in. This was commissioned by  
 10 Chief Superintendent John O'Hare, it was the day before,  
 11 26 July 2017, and you were, as we've understood it,  
 12 participant 6.  
 13 {INQ000790/1}. We can see I have given the date  
 14 accurately and the debrief participants are listed.  
 15 Lots of the names that we are familiar with and who will  
 16 be giving evidence in the coming week or so. You are  
 17 the second named person. As I have indicated, you are  
 18 participant 6 as we look through this document.  
 19 If we go to {INQ000790/5}, please. Under  
 20 "Communication", you, participant 6, say:  
 21 "It was difficult to speak to other emergency  
 22 services due to the multi--Airwave channel not working."  
 23 And again there isn't the merest hint in that  
 24 debrief that you had deliberately kept secret the  
 25 declaration; do you agree?

121

1 A. Yes.  
 2 Q. You were then, as Mr Weatherby identified, interviewed  
 3 as part of Kerslake. That was on 10 January 2018, and  
 4 as Mr Weatherby identified, you made no mention in  
 5 74 pages of the fact that you made a deliberate decision  
 6 to keep the declaration secret; am I correct?  
 7 A. Yes.  
 8 Q. And indeed, you were to say, as Mr Weatherby  
 9 highlighted, that you had had a belief that NWAS knew.  
 10 So there seemed to be, as there were earlier  
 11 in relation to a different issue, three possibilities.  
 12 That during each of these processes you had forgotten  
 13 that you had deliberately decided not to communicate  
 14 your declaration, first. Second, that you were  
 15 deliberately not revealing or even concealing the fact  
 16 that that had been your decision--making. And, thirdly,  
 17 that you never made such a decision and had not thought  
 18 of that yet. Which of those is correct?  
 19 SIR JOHN SAUNDERS: If it's something else, don't hesitate  
 20 to say so. Don't feel limited to the three  
 21 alternatives.  
 22 A. Absolutely, sir, it's point 2: it was a deliberate  
 23 decision, and because of the timings of the debriefs, as  
 24 I said, I can't remember if it was this morning or  
 25 yesterday, I felt as if I'd got away with it. Therefore

122

1 it wasn't at that point -- it wasn't a decision that  
 2 I was proud of, as in I knew it would draw criticism,  
 3 but I still believed it was the right thing to do, but  
 4 I honestly believed that it would draw criticism by not  
 5 doing that. So it is definitely point 2, you're correct  
 6 there.  
 7 MR GREANEY: In a sense, I'd rather not put this blunt  
 8 question to you, but does it amount to this: that in the  
 9 course of those processes, you were lying about your  
 10 decision--making at the time?  
 11 A. I can quite understand why you'd suggest that, but, no,  
 12 it's not the case.  
 13 SIR JOHN SAUNDERS: Okay, well, a deliberate decision to  
 14 tell an untruth is normally called a lie. So what  
 15 you have told us is a deliberate decision to make an  
 16 untruth.  
 17 A. I think it's a deliberate decision -- there's aspects --  
 18 I don't believe there's anything in there that isn't  
 19 accurate. It's an omission that I haven't said it, but  
 20 everything else that's in there is accurate. I did make  
 21 attempts to contact NWAS and couldn't get through and,  
 22 as I have said in my previous evidence, sir, I'm glad  
 23 I didn't get through. That was because I was  
 24 conflicted. So I haven't put anything in there which  
 25 isn't true, I just omitted that aspect.

123

1 SIR JOHN SAUNDERS: Okay. It's a pretty significant part of  
 2 your account of what happened that day?  
 3 A. Yes.  
 4 SIR JOHN SAUNDERS: If people are looking for lessons to  
 5 learn, it might have been helpful to them to have known  
 6 that particular lesson. But this is an integral and  
 7 central problem that you identified with Plato?  
 8 A. Absolutely, sir. With hindsight -- not even  
 9 hindsight -- for it to be a worthwhile debrief, then  
 10 those issue should have been raised by me.  
 11 SIR JOHN SAUNDERS: And you were being criticised, weren't  
 12 you, for not telling them, for whatever reason, for not  
 13 speaking to the Ambulance Service and the Fire Service?  
 14 This is my recollection of reading Kerslake and  
 15 I haven't read it within the last 24 hours anyway.  
 16 Lord Kerslake concludes that you should have told them  
 17 but actually it's rather a good thing you didn't. So he  
 18 said: yes, you did something wrong, but actually it  
 19 turned out better than otherwise. So you were facing  
 20 some criticism, weren't you?  
 21 A. I think I was in a no-win situation, sir, with whatever  
 22 decisions I identified that I'd made or hadn't made.  
 23 There was only going to be one outcome, that fault would  
 24 always be picked with the command of any incident.  
 25 That's quite rightly so, that lessons can be learned

124



1 from that. I think, as I've already said, I didn't want  
 2 to highlight the fact that I deliberately made that  
 3 decision. The majority of these debriefs are within the  
 4 12-month period after the event and some shorter than  
 5 that. And ultimately, I wasn't that proud that I'd gone  
 6 significantly against protocol or against guidance.  
 7 I still believe it was the right thing to do and I've  
 8 maintained that. It was a deliberate decision, but  
 9 I didn't want to draw attention to it once I thought,  
 10 "It's over and done with now, I've got away with it",  
 11 and that's me being as honest as I can be.  
 12 SIR JOHN SAUNDERS: Mr Greaney.  
 13 MR GREANEY: Just one question and then we'll move on to the  
 14 second point. Does the sequence of questions and  
 15 answers that we have just been through make you want to  
 16 alter any aspect of the account that you have given so  
 17 far?  
 18 A. No.  
 19 Q. Next, and this is the second point, I'm going to track  
 20 through with you what we can hear on the dictaphone  
 21 recording of something said by the first FDS,  
 22 Mr Randall, at an early stage. But first, while you are  
 23 in the OCR, is the FDS close to you?  
 24 A. Sat beside me the majority of the time, yes.  
 25 Q. Could we have on the screen, please, the transcript of

125

1 the dictaphone recording, which we've looked at many  
 2 times, {INQ024325/1}.  
 3 We can see at the bottom of the page, that is your  
 4 Plato declaration, is it not?  
 5 A. Yes.  
 6 Q. I just want to focus on what happens, really very, very  
 7 quickly afterwards. Over the page, please,  
 8 {INQ024325/2}.  
 9 About a third of the way down, the FDS, Mr Randall:  
 10 "John, the press office, the press office."  
 11 And then there's some overspeaking and towards the  
 12 bottom of that page, Mr Randall again:  
 13 "The media line is going like a chippy, I believe."  
 14 And then if we go over the page {INQ024325/3} we can  
 15 see Mr Randall and what's happening here is that the  
 16 dictaphone is picking up one half of a conversation by  
 17 telephone and not the other half. Mr Randall:  
 18 "If you know what I mean..."  
 19 And then a little lower down:  
 20 "I think you need to."  
 21 And then we have just above the middle of the page,  
 22 Mr Randall:  
 23 "I think we're going to set up a Silver already but  
 24 we're trying to get staff in for it, if you know what  
 25 I mean, senior officers."

126

1 He then says:  
 2 "But it has been -- it's been declared,  
 3 Operation Plato."  
 4 Do you see that?  
 5 A. Yes.  
 6 Q. So very, very quickly after you have declared  
 7 Operation Plato, Mr Randall is telling somebody that  
 8 you have done so.  
 9 A. Yes.  
 10 Q. What Mr de la Poer has done, credit where it's due, is  
 11 to drill into the conversation that we have just looked  
 12 at half of in order to identify to whom Mr Randall was  
 13 speaking. Do you know the answer that he has come up  
 14 with?  
 15 A. No.  
 16 Q. The answer is that he was speaking to the press officer.  
 17 We can listen to that call now and I hope with the  
 18 assistance of Mr Lopez we can have on the screen also  
 19 the transcript.  
 20 SIR JOHN SAUNDERS: Mr de la Poer is not giving evidence so  
 21 it's important that you check that the suggestion is  
 22 correct so far as you can tell. All right?  
 23 MR GREANEY: I don't think there is going to be any doubt,  
 24 sir, but that's me giving evidence.  
 25 SIR JOHN SAUNDERS: I'm sure that's right. Mr de la Poer

127

1 could be called, if necessary, to give evidence.  
 2 MR GREANEY: He could, sir. In fact that seems like a good  
 3 idea when you say it!  
 4 SIR JOHN SAUNDERS: Thank you.  
 5 MR GREANEY: The recording is {INQ018839/1} from a counter  
 13:02:02 6 time of 00:18:54. I think you do indeed have that,  
 6 Mr Lopez. I have to say this for the transcript: the  
 7 transcript that we're going to be looking at is  
 8 {INQ018839T/11}, from page 11. If we could put that on  
 9 the screen before you start to play it. We're starting  
 13:02:22 11 at 00:18:54, where someone says:  
 10 "Hello, Ben speaking."  
 11 That has been attributed in the transcript, which  
 12 I ought to say is the work of GMP, although, sir, your  
 13 team have made a contribution to it, is attributed to  
 14 Ben Ashworth, who we identified yesterday as the press  
 15 officer, didn't we?  
 16 A. Yes.  
 17 Q. Mr Lopez, it's just a short passage. If we can play the  
 18 recording and if you can take us through the transcript  
 19 as well.  
 20 (1.02 pm)  
 21 (Audio recording played to the inquiry)  
 22 (1.04 pm)  
 23 MR GREANEY: Chief inspector, do you agree that informing

128

1 the press officer was not the best way of keeping the  
 2 declaration secret?  
 3 A. I don't think I was aware that Ian was ringing the press  
 4 officer. However, at those early stages, certainly the  
 5 early stages of the incident, the press office would  
 6 just send out a bland statement. I very much doubt they  
 7 would have used Operation Plato. Ideally, I would have  
 8 preferred for it not to have been mentioned, but I don't  
 9 think I was aware that that had been the case.  
 10 Q. There are perhaps two separate issues that I'll ask you  
 11 about. First, you made or at that time were making  
 12 a decision to keep your declaration of Operation Plato  
 13 a secret from your emergency service partners?  
 14 A. It was very much the start of that thinking, yes.  
 15 Q. I was hoping you would be able to agree, and just  
 16 looking at this objectively, not whether you knew about  
 17 it at the time but objectively for the force press  
 18 officer to be told that you had declared Operation Plato  
 19 wouldn't seem to be a very good way of keeping it  
 20 secret?  
 21 A. It wouldn't have been, no.  
 22 Q. At the very least, does the fact that that occurred seem  
 23 to indicate a flaw in your plan to keep it secret?  
 24 A. I think that the -- Ian would have made that contact  
 25 most probably off his own bat and it would have been

129

1 expected for him to give me that assistance so there's  
 2 no criticism there whatsoever.  
 3 Q. No -- well, he hadn't been told to keep it secret.  
 4 A. No. I think it's something that I didn't consider. In  
 5 the cold light of day it's easy to sit here and say, "If  
 6 you do this, this is the implications", for every single  
 7 aspect of how that can play out. But in the heat of the  
 8 moment, as a decision is starting to play out in my head  
 9 about what I'm doing and being able to justify why I'm  
 10 doing it, then things are going to be missed and that is  
 11 something that's obviously been missed. But, yes,  
 12 I agree that telling the press officer is not the best  
 13 way for me to keep --  
 14 SIR JOHN SAUNDERS: But your answer is you didn't know it  
 15 was going to be told to the press officer?  
 16 A. I didn't know it was being told.  
 17 MR GREANEY: I'm just going to ask: Mr Randall was there  
 18 seated beside you; did you hear him speaking to the  
 19 press officer?  
 20 A. No, I can't say I did. I think you can gather from the  
 21 audio dictaphone transmission how busy it was around me.  
 22 Q. That is true.  
 23 A. He was making numerous phone calls to various people and  
 24 speaking to various people. I was concentrating on  
 25 whatever it was I was doing at that time. So no,

130

1 unfortunately, I didn't have the ability to listen to  
 2 numerous conversations at the same time and take in  
 3 what was going on. So no, I wouldn't have known who  
 4 he was potentially speaking to unless I picked up the  
 5 name.  
 6 Q. Does anything in the sequence of questions and answers  
 7 we have just been through cause you to wish to alter any  
 8 aspect of your account?  
 9 A. No.  
 10 MR GREANEY: Chief inspector, thank you again for answering  
 11 my questions. Could we have as short a break --  
 12 SIR JOHN SAUNDERS: Let's try and work out what's the best  
 13 way to deal with this. Obviously, there must be  
 14 a break, and I understand that, and equally we want to  
 15 finish your evidence as soon as possible.  
 16 Mr Davies, how long would you like?  
 17 MR DAVIES: Sir, I'm ready to start whenever the witness and  
 18 the court is ready, so I'm very much in other people's  
 19 hands. My prediction is up to 20 minutes of  
 20 questioning.  
 21 SIR JOHN SAUNDERS: So we need a gap.  
 22 MR GREANEY: Mr Davies is being very polite. I know his  
 23 preference, for good reason, is we do not take the full  
 24 lunch break at this stage but instead take a short  
 25 break.

131

1 SIR JOHN SAUNDERS: Ten minutes?  
 2 MR GREANEY: Ten minutes is fine, sir.  
 3 SIR JOHN SAUNDERS: Thank you.  
 4 (1.10 pm)  
 5 (A short break)  
 6 (1.21 pm)  
 7 MR GREANEY: Sir, finally, Mr Davies, who, as I indicated,  
 8 represents the interests of the witness.  
 9 Questions from MR DAVIES  
 10 MR DAVIES: Chief inspector, I'm going to ask you about  
 11 a number of areas, but I want to grip straightaway the  
 12 first line of questioning that's just arisen and taken  
 13 by Mr Greaney. All right?  
 14 You've indicated to the inquiry that although the  
 15 answers you gave variously in debriefs and to the  
 16 Kerslake Inquiry were strictly accurate; yes?  
 17 A. Yes.  
 18 Q. You omitted, deliberately, the decision-making you had  
 19 applied in relation to declaring Operation Plato to  
 20 other agencies on --  
 21 A. Yes.  
 22 Q. -- the night of this terrorist atrocity? Do you  
 23 appreciate, given the purposes of the debriefs, and even  
 24 perhaps more particularly the purpose of the  
 25 Kerslake Inquiry, that by omitting to provide that

132

1 important explanation, you did not promote the purposes  
 2 of those inquiries?  
 3 A. Not in full. With the Kerslake, it is very much a case  
 4 that I really most probably omitted it as in that it did  
 5 not come up in any other debrief and I just did not  
 6 bother mentioning it. Whether it was deliberate or by  
 7 mistake, it was most probably deliberate, but yes, it  
 8 was a piece of information which may be useful.  
 9 SIR JOHN SAUNDERS: Mr Davies, I'm really sorry. I do not  
 10 wish to make things worse for the chief inspector, but  
 11 I have to have accuracy, really.  
 12 MR DAVIES: Yes.  
 13 SIR JOHN SAUNDERS: And my recollection, I'll be corrected,  
 14 is that in one of the debriefs, namely I think the first  
 15 one we were told about, in fact what the chief inspector  
 16 said he actually did give an explanation for not telling  
 17 the fire and the ambulance, which was that he was under  
 18 such pressure.  
 19 MR DAVIES: Yes.  
 20 SIR JOHN SAUNDERS: So it's not that he didn't mislead  
 21 anybody.  
 22 Actually, you did give an entirely different  
 23 explanation from the one you've given me on that  
 24 occasion.  
 25 A. I think, sir, to be fair --

1 SIR JOHN SAUNDERS: I really do want to be fair.  
 2 A. Without doubt, the reasons why phone calls and contacts  
 3 weren't made was because of the pressure that was on me.  
 4 So that is not an inaccurate assessment.  
 5 However, having said that, although I did try to  
 6 contact NWAS as I've already said, I'm glad I didn't  
 7 manage to speak to them on the night, but what I told  
 8 the Kerslake Report was that was accurate in that part  
 9 of the reason was the pressure that was on...  
 10 SIR JOHN SAUNDERS: Okay. Well, we'll look at it if  
 11 necessary.  
 12 MR DAVIES: We will look at it again, but one can  
 13 understand, and everyone has watched the transcript and  
 14 coupled with the audio, that later in the event, the  
 15 explanation may have been you were overwhelmed. But in  
 16 terms of the initial decision not to contact the other  
 17 emergency organisations, your explanation is that it was  
 18 deliberate for all the reasons you've been through  
 19 a number of times, that that was omitted from each of  
 20 those inquiries, wasn't it, that part of it?  
 21 A. Yes.  
 22 Q. Do you accept the proposition that you should not have  
 23 omitted that part of your explanation from each of those  
 24 inquiries?  
 25 A. Yes.

1 Q. Can you understand if those listening to the fact that  
 2 you omitted that from inquiries directed at  
 3 understanding a loss of life and level of injury on this  
 4 scale, that would be a real concern to those people that  
 5 you omitted those facts?  
 6 A. Yes.  
 7 Q. All right, a number of topics. First topic, your  
 8 training and experience in terms of firearms command.  
 9 I'm not going back to your FDO training and experience.  
 10 We know you were the ITFC. We know there are  
 11 certain basic principles of firearms command: it is  
 12 role, not rank. We know there's a readily understood  
 13 distinction between pre-planned and spontaneous  
 14 operations. All right?  
 15 A. Yes.  
 16 Q. Pre-planned can be arrests, MARS(?) operations, searches  
 17 and so on. Spontaneous is what it says. All right?  
 18 A. Yes.  
 19 Q. In a pre-planned operation, would the TFC expect to have  
 20 a tac adviser?  
 21 A. Yes.  
 22 Q. And in terms of spontaneous firearms operations, by  
 23 contrast, how long would it take to have a tac adviser  
 24 to the ITFC in a spontaneous context?  
 25 A. They are usually immediately available at the end of

1 a phone.  
 2 Q. In relation to the immediate incident, was there a point  
 3 at which you had the benefit of a tac adviser?  
 4 A. Yes.  
 5 Q. When was that?  
 6 A. When I had a discussion with Sergeant Lawton and that  
 7 was at, I think, around about 22.35 or 22.36.  
 8 Q. Did you go back to him for further tac advice?  
 9 A. I spoke to him on a number of occasions, but discussing  
 10 specifically tactics. I don't think we discussed after  
 11 that.  
 12 Q. All right. What was the level of your experience,  
 13 slightly in more quantified terms than we've had, of  
 14 commanding spontaneous firearms incidents as an ITFC  
 15 before this incident?  
 16 A. Significant. In excess of 100 deployments, easily.  
 17 Q. And you obviously were occupationally competent, but  
 18 you were operationally competent?  
 19 A. Yes.  
 20 Q. And obviously, there's a variety, but these spontaneous  
 21 firearms incidents require you operationally to  
 22 demonstrate that you can do it?  
 23 A. Yes.  
 24 Q. In that sense, is there any distinction between your  
 25 level of experience and qualification and a cadre TFC

1 for pre-planned operations, the equivalent of  
 2 pre-planned?  
 3 A. They are certainly more experienced in pre-planned  
 4 operations, but not more experienced, in fact  
 5 potentially less experienced, in spontaneous  
 6 deployments.  
 7 Q. All right. Second topic, and I know the evidence you've  
 8 given as to your understanding of it, but I want to go  
 9 back to the definition of an MTFA. Mr Horwell took you  
 10 through some parts of JOPs and I won't repeat it in  
 11 terms of whether it is limited to firearms incidents  
 12 and/or single shooters and so on. The language in there  
 13 of "may", do you remember?  
 14 A. Yes.  
 15 Q. I want to go to another document, please, {INQ016688/5}  
 16 to start.  
 17 SIR JOHN SAUNDERS: We nowadays are talking through screens  
 18 and I'm afraid I'm finding it a bit difficult to hear  
 19 you. If you wouldn't mind speaking up a bit, I would be  
 20 grateful.  
 21 MR DAVIES: Of course I will.  
 22 SIR JOHN SAUNDERS: Thank you.  
 23 MR DAVIES: We know this is -- everyone's familiar with  
 24 it -- the document directed at defining the type of  
 25 incident. If we are at page 5, as we are,

1 paragraph 3.8:  
 2 "Indications that an MTFA is underway could include  
 3 the following: multiple subjects; indiscriminate attacks  
 4 designed to cause mass casualties; targeting soft  
 5 targets and particularly crowded public areas or events;  
 6 targeting of iconic sites with political, cultural or  
 7 economic significance."  
 8 And over the page {INQ016688/6}, please:  
 9 "Use of improvised explosive devices and/or  
 10 [omitted]; subjects shouting religious or ideological  
 11 slogans or remarks."  
 12 The less sophisticated, non-MTFA are defined at  
 13 paragraphs 3.9 and on. Effectively, in summary, they  
 14 appear to indicate the type of attack where something  
 15 such as a knife or a car is used in a criminal manner;  
 16 yes?  
 17 A. Yes.  
 18 Q. Whereas if one looks at the criterion, the  
 19 identification indicators, as it's called, if we go  
 20 further down page 6, please, the identification  
 21 indicators for an MTFA are not limited, are they, in  
 22 this document to the use of a firearm, still less the  
 23 necessity of there being evidence of a single shooter or  
 24 a person with a firearm in or around the scene of the  
 25 original incident?

1 A. Yes.  
 2 Q. So using the identification indicators as defined for  
 3 an MTFA, a number of those, it may be thought, were met  
 4 in relation to the information you'd received before you  
 5 declared Plato.  
 6 SIR JOHN SAUNDERS: Can we go back to the page where it's  
 7 on? Could we turn back to {INQ016688/5} because you're  
 8 now talking about page 5.  
 9 MR DAVIES: Yes, I am, and {INQ016688/6}.  
 10 It's not for me to say, but arguably:  
 11 "An indiscriminate attack designed to cause mass  
 12 casualties, targeting soft targets and particularly  
 13 crowded public areas or events."  
 14 Would you describe targeting those -- the  
 15 Ariana Grande concert at the Manchester Arena as  
 16 satisfying that criterion?  
 17 A. Very much so.  
 18 Q. "Targeting iconic sites with political, cultural or  
 19 economic significance"?  
 20 Potentially cultural significance to the arena?  
 21 A. It wouldn't have been something that I would have  
 22 considered. Potentially economic significance.  
 23 Q. Yes. Perhaps most starkly, over the page, please,  
 24 {INQ016688/6}, "An improvised explosive device"?  
 25 A. Yes.

1 Q. At least two of these criteria are met, aren't they?  
 2 A. Yes.  
 3 Q. If that is the basis on which an MTFA is to be  
 4 identified, does it cause you to reflect on the  
 5 significance or otherwise of firearms and single  
 6 shooters and that line of questioning you've had from  
 7 several core participants?  
 8 A. For me, the Op Plato -- I know there are obviously  
 9 potential indicators that were just mentioned there.  
 10 For me, the fact that there was a report of gunshot  
 11 wounds met the criteria.  
 12 SIR JOHN SAUNDERS: Mr Davies, I'm really sorry, I'm  
 13 concerned about a possible -- I agree it's not that  
 14 clear. Can we go back to {INQ016688/5}, sorry. I don't  
 15 think the fact that there are multiple subjects or there  
 16 are soft targets is meant to be a definition of what is  
 17 a marauding terrorist firearms attack. I read that as  
 18 saying: if that is what is happening, that may be an  
 19 indication that there is a marauding firearm around as  
 20 well. And I think that's actually the way the witness  
 21 is interpreting it as well. So if those things are  
 22 going on, they're indications that this is what may be  
 23 happening. I don't think it's removing the need for  
 24 there to be a firearm.  
 25 MR DAVIES: Right.

1 SIR JOHN SAUNDERS: I agree it's not necessarily as clear as  
2 it might be.  
3 MR DAVIES: Yes. Looking at paragraph 3.8, which after all  
4 is the start of the paragraph with these considerations:  
5 "Indications that an MTFA is underway could include  
6 the following ..."  
7 Now, as the chair has observed, and in the end it's  
8 a matter for the inquiry on the whole of the evidence,  
9 your understanding was that there had to be a firearms  
10 component before it's MTFA?  
11 A. Yes.  
12 Q. I'm not trying to go behind that, that is --  
13 SIR JOHN SAUNDERS: That's what the words mean.  
14 MR DAVIES: Yes, taken literally, yes.  
15 On the other hand, chief inspector, one steps back  
16 from that, where there has been the detonation of an  
17 improvised explosive device at a venue, logically  
18 speaking, a marauding attack could take one of a number  
19 of forms after that, couldn't it, not restricted to the  
20 use of a firearm?  
21 A. I mean, there's certain aspects of that. Yes, multiple  
22 subjects, multi-sited attacks.  
23 Q. Please concentrate on the question: where there has been  
24 the detonation, as here, of an improvised explosive  
25 device, which by its nature, one may think, demonstrates

141

1 a level of sophistication and possible terrorism as  
2 distinct from a knife or a car, the threat that arises  
3 from that could be another PBIED?  
4 A. Yes.  
5 Q. A secondary device?  
6 A. Yes.  
7 Q. Or a firearm?  
8 A. Yes.  
9 Q. And that threat is mobile, it's marauding --  
10 A. Yes.  
11 Q. -- whichever type it is? So when one looks at this, and  
12 I'm not going behind your understanding at the time, but  
13 in fact in terms of a marauding terrorist attack, would  
14 you agree or disagree that the emphasis in the guidance  
15 and in your understanding on firearms doesn't  
16 necessarily fully reflect the nature of terrorist  
17 activity?  
18 A. I think I'm struggling to understand the question. If  
19 you could rephrase it, please.  
20 Q. Yes. If you had thought or there was intelligence to  
21 the effect that there was a second PBIED, but no  
22 evidence of a firearm, would that have affected your  
23 decision-making in terms of (a) declaring and (b)  
24 maintaining Operation Plato?  
25 A. Certainly not maintaining. It would have assisted in

142

1 maintaining my belief that it should be in place.  
2 I think on the night, most definitely I would have  
3 wanted to see some form of evidence of an active  
4 shooter, therefore the presence of a firearm.  
5 Q. All right. In terms of your evidence, I'll leave that  
6 there.  
7 A narrow and, I hope, probably not that significant  
8 point. WhatsApp, just to take things chronologically.  
9 Could we have the transcript, please, up?  
10 {INQ024325/54}.  
11 You've indicated you haven't retained the WhatsApp  
12 group, we understand that. It was informal, we  
13 understand that.  
14 When in the sequence of events would you have seen  
15 the need to put a shout-out to other FDOs on the group  
16 for one of them hopefully to come in to assist you?  
17 I know you can't time it, but when in the sequence of  
18 events would that have arisen, do you think?  
19 A. It wouldn't have been an immediate consideration and  
20 potentially should have been. But I would think that  
21 certainly within the first hour, once the full  
22 understanding of what we were dealing with was apparent  
23 and the fact that there was so much going on, I would  
24 like to think that the initial contact or WhatsApp  
25 message was sent out within the first hour.

143

1 Q. Just look at the entry at 00.25 {INQ024325/54}, if that  
2 could be expanded, please, Mr Lopez.  
3 This is just really to see whether this is, if not  
4 the timing, but the fact of the message having gone out  
5 to your colleagues. It's you speaking, 00.25, to  
6 somebody called Kev and you're referring to:  
7 "A shout-out, it was just a shout-out."  
8 A. Can I just read it?  
9 (Pause).  
10 Yes, that will be Kevin Hodder, one of the FDOs,  
11 who's obviously responding to my WhatsApp message.  
12 Q. The next topic is rendezvous points. These are in JOPs  
13 at paragraph 4.5 if we need to go to it. You were taken  
14 by Mr Warnock, quite properly, to the GMP major incident  
15 plan and the terms of that. {INQ007279/35}, if  
16 a reference is needed.  
17 On an incident such as this, the rendezvous point is  
18 of what scale in terms of vehicles?  
19 A. In the early stages, you try to get the largest area  
20 that you can and that's to support until you fully  
21 understand what's going on potentially -- obviously  
22 multiple police vehicles, multiple --  
23 Q. Try and quantify it for us. Multiple doesn't help.  
24 A. It's a difficult question to answer. I would think that  
25 most certainly you'd be looking for somewhere that could

144

1 hold at least 15 vehicles.  
 2 Q. With mass casualties and the potential for fire to  
 3 attend and NWS and police and BTP and others, we're  
 4 talking many, many vehicles, aren't we, of some size?  
 5 A. Yes.  
 6 Q. And bearing in mind the initial rendezvous point is  
 7 in relation to an incident with mass casualties who  
 8 require immediate medical intervention, do you regard it  
 9 as operationally realistic for there to be a search of  
 10 the nominated rendezvous point to eliminate the  
 11 possibility of secondary devices before it is set up?  
 12 A. No, and as I said yesterday in my evidence, that's an  
 13 unrealistic expectation.  
 14 Q. Secondly, one understands the point it shouldn't be an  
 15 obvious location, but the cathedral was a good location  
 16 but not the inevitable location, do you agree, of the  
 17 RVP?  
 18 A. Yes, I agree fully.  
 19 Q. The next topic is declaring a major incident. You've  
 20 already said that any organisation can declare it. And  
 21 to some extent, it was obvious from the intrinsic nature  
 22 of this incident that it was a major incident.  
 23 A. Yes.  
 24 Q. You had or communication had been had as to the nature  
 25 of the incident with Mr Nawaz?

145

1 A. Yes.  
 2 Q. And Chief Inspector Buckle?  
 3 A. Yes.  
 4 Q. By 22.44.  
 5 A. Yes.  
 6 Q. What were your expectations, if any, of them in terms of  
 7 declaring a major incident?  
 8 A. It would normally be -- it would normally sit within the  
 9 Silver command. If I'm being honest and totally fair  
 10 with them, I don't think that I gave it much more  
 11 consideration other than once they fully understood  
 12 what was happening, and certainly Night Silver, that  
 13 potentially the consideration of a major incident  
 14 declaration may have been given. But I can't say that  
 15 I gave it an in-depth consideration myself.  
 16 Q. Did you expect somebody to declare a major incident  
 17 within the command chain?  
 18 A. Yes.  
 19 Q. The next topic is Plato and the circumstances in which  
 20 you declared it. The declaration is at or around 22.47.  
 21 A. Yes.  
 22 Q. On the transcripts, we know that you received from the  
 23 scene descriptions of the reality of the scene at 22.48  
 24 from the Bronze, Richardson.  
 25 A. Yes.

146

1 Q. At 22.50, from AFO Adams?  
 2 A. Yes.  
 3 Q. And at 22.54, again from the Bronze, the OFC,  
 4 Mr Richardson, which in summary he was relating it was  
 5 some kind of nail bomb, there were bolts and shrapnel  
 6 everywhere, and there were mass casualties?  
 7 A. Yes.  
 8 Q. That's how it ends at that point. You were also aware  
 9 that AFOs were in place and progressively in place to  
 10 provide a level of security to those at the scene?  
 11 A. Yes.  
 12 Q. Rightly, Mr Greaney has referred to the golden hour in  
 13 terms of JESIP principles, but have you read the  
 14 evidence of Brigadier Hodgetts from Day 68 of this  
 15 inquiry?  
 16 A. Yes, I'm aware of his evidence.  
 17 Q. Where he speaks of the platinum 10 minutes in terms of  
 18 casualty treatment?  
 19 A. Yes.  
 20 Q. The categories of injury, including the type that would  
 21 have arisen here and that were being reported to you?  
 22 A. Yes.  
 23 Q. What was your understanding at the time of the necessity  
 24 of immediate treatment for these types of catastrophic  
 25 bleeding injuries following a bomb of the type that had

147

1 been described to you by Mr Richardson and others up to  
 2 22.50?  
 3 A. I don't think I had any detailed knowledge of what  
 4 treatment and when it should be given, but I think  
 5 a commonsense approach would be that actually that type  
 6 of injury will need significant medical treatment at the  
 7 earliest opportunity.  
 8 Q. Yes. There's a tension, isn't there, between the nature  
 9 of the event giving rise to the injuries and the future  
 10 threat that there may be at the scene --  
 11 A. Yes.  
 12 Q. -- and the platinum 10 minutes, whereby if people are  
 13 not treated, the survival rate collapses?  
 14 A. As I understand it, yes, from his evidence.  
 15 Q. So even without a perfect understanding of the data that  
 16 the brigadier gave, if you had declared Plato to those  
 17 at the scene, as you've described a number of times,  
 18 those at the scene would have been withdrawn --  
 19 A. Yes.  
 20 Q. -- in that crucial period; yes?  
 21 A. Yes, definitely.  
 22 Q. And putting to one side whether you were right to  
 23 conclude it was still a hot zone, even had it been  
 24 declared warm as distinct from hot as part of a threat  
 25 assessment, what would your expectation have been about

148

1 the numbers and speed of deployment of unarmed assets  
 2 into the warm zone? What was the time frame for that?  
 3 A. I can't comment on the time frame, but most definitely  
 4 if it had been a warm zone, you still can only have the  
 5 HART team and the specialist response team from GMFRS  
 6 entering and that would have taken some time to pull  
 7 together. It would need to be a turnout from those  
 8 resources, but I wouldn't expect that they were on the  
 9 ground within that first 10 minutes.  
 10 Q. Yes. Everyone is familiar with the JOPs definition of  
 11 warm and indeed paragraph 4.16 of JOPs as to the  
 12 expectation that those deploying into warm will wear  
 13 ballistic equipment and helmets.  
 14 A. Yes.  
 15 Q. The one commodity you didn't have, chief inspector, was  
 16 time in terms of these injuries ; is that fair?  
 17 A. Most definitely.  
 18 Q. What was your experience of the time it would take to  
 19 deploy HART and SRT teams from other incidents?  
 20 A. It's certainly something which will take longer.  
 21 I think I've only had one experience where I've had to  
 22 turn out HART in any kind of time—critical event, and  
 23 I think the turnout for that was in excess of  
 24 20 minutes. But HART — my experience with HART is more  
 25 around the more slow time, slow—moving type incidents,

1 because obviously the HART team can go into hazardous  
 2 areas, so it could be a building, an infrastructure  
 3 failure, that type of thing. But certainly, my personal  
 4 understanding would be that it wouldn't have been within  
 5 20 minutes.  
 6 Q. Yes. So a straightforward question: when you made your  
 7 decision not to declare to other agencies, did you  
 8 expect that to hold indefinitely or was it simply for  
 9 the shorter period as the critical situation was  
 10 addressed on the ground?  
 11 A. The intention was for that initial period until a full  
 12 understanding and assessment of the area — I was able  
 13 to gain that awareness of what the actual risk was.  
 14 I don't think at any point was a decision that I was  
 15 never going to want to tell GMFRS or NWAS about it.  
 16 Q. Yes. You've had a line of questioning, quite  
 17 legitimately, from people saying, "Well, wasn't it  
 18 inevitable that they would find out?" You understood  
 19 that line of questioning? But actually, it's a feature,  
 20 maybe surprising, of the evidence that they didn't find  
 21 out that Operation Plato had been declared. Does that  
 22 surprise you, operationally, or not?  
 23 A. Yes, I am surprised that at some point, as the incident  
 24 progressed, they weren't aware, and there were a number  
 25 of reasons for that: the fact that it was on the FWIN,

1 that there were firearms officers down at the scene who  
 2 knew it. So to find out that actually they were never  
 3 aware of Plato did surprise me.  
 4 Q. Well, a short point: there were lines of communication  
 5 between the organisations that you couldn't control as  
 6 well?  
 7 A. Yes.  
 8 Q. A related point, but a short one: your expectations  
 9 based on previous major incidents of whether fire would,  
 10 in the absence of situational awareness from you, deploy  
 11 a person at least to the scene to obtain situational  
 12 awareness?  
 13 A. That was certainly my experience.  
 14 Q. The next, please, is an entry at 23.04 on the  
 15 transcript. I'm just going to ask for the audio to be  
 16 played as well for a short extract. This has been  
 17 played before. It is page 11 of the transcript if we  
 18 could put that up first, Mr Lopez, so that everyone who  
 19 is listening in to this or watching will see the passage  
 20 I'm referring to in order to determine whether they are  
 21 comfortable hearing it played again.  
 22 {INQ024325/11}. We can read through that and the  
 23 passage I'm interested in is between 17:59 and, in terms  
 24 of chronological time, 23.05, your answer there.  
 25 I would like you just to look at this, listen to it, and

1 then inform the inquiry whether you believe you have  
 2 absorbed what is said in the radio transmission or have  
 3 not absorbed and heard it. If that could be played,  
 4 please.  
 5 (Audio recording played to the inquiry).  
 6 So looking at that again, are you able to say  
 7 whether you heard what the OFC was reporting over the  
 8 radio transmission at about 18:11 on the counter?  
 9 A. From listening to that, I was in conversation with  
 10 Ian Randall, so I think I'm talking to him whilst this  
 11 is being relayed over the air because that transmission  
 12 isn't directly to me, so there is a very good  
 13 possibility that I wasn't aware of that update. Once  
 14 I'd finished talking to Ian, obviously I've picked up on  
 15 the fact that he's asked for an explo dog and that's  
 16 what's prompted me.  
 17 Q. So if you didn't hear and absorb it because you were  
 18 discussing, as it happens, to start with, something to  
 19 do with the press office, does it not tend to  
 20 demonstrate that your various competing duties here were  
 21 representing a distraction in terms of absorbing  
 22 information from the scene?  
 23 A. Absolutely. It's a prime example, clear example, of my  
 24 FDO role taking away the firearms role. I should have  
 25 been listening to that as the ITFC because that's

1 a direct update from the OFC, but I was tied up dealing  
 2 with something else that was not ITFC-related.  
 3 Q. Chronologically, you've already given evidence that by  
 4 23.13 you were starting to re-evaluate the Plato  
 5 element. There was further information at 23.16, it's  
 6 well-travelled ground, that caused you to re-evaluate  
 7 again?  
 8 A. Yes.  
 9 Q. There's a further event, isn't there, in terms of your  
 10 direct command of the firearms element, the TFC  
 11 function, because at 23.23, Chief Inspector Dexter  
 12 arrives at the scene; yes?  
 13 A. Yes.  
 14 Q. He's GATFC and is communicating back to you by 23.26 on  
 15 the transcript.  
 16 A. Yes.  
 17 Q. At 23.53, there's the comment we all remember that there  
 18 was a dual command between you for a period.  
 19 A. Yes.  
 20 Q. But from 23.53 you directly say, "You're the TFC on the  
 21 ground"?  
 22 A. Yes.  
 23 Q. I needn't go to all the references.  
 24 Once he is GATFC, whether one takes it from 23.26 or  
 25 23.53, whose firearms responsibility was it to determine

153

1 zones and matters of that kind under JESIP at the scene?  
 2 A. That would be down to the ground-assigned TFC.  
 3 Q. Would that include matters such as rendezvous points?  
 4 A. I think rendezvous points for firearms teams but not for  
 5 unarmed.  
 6 Q. You were not replaced by a cadre TFC until 00.17?  
 7 A. Yes.  
 8 Q. So your initial role, concurrent with FDO duties,  
 9 extended for an hour and three-quarters, give or take?  
 10 A. Yes.  
 11 Q. How did that compare to the period of time for major  
 12 incidents where you'd been ITFC previously in terms of  
 13 the assumption of operational firearms command by  
 14 a cadre TFC?  
 15 A. I'd never been involved in a major incident and firearms  
 16 incident at the same time prior to that night, but it  
 17 was the handover depending on how -- depending on where  
 18 we were up with the firearms deployment was certainly  
 19 within -- would normally be, if the officer was  
 20 available, within an hour. But it has been known to  
 21 take up to 2 hours, but that is almost unacceptable  
 22 because they just need to be in a position to take  
 23 command and control and that can be done from home if  
 24 necessary.  
 25 Q. As you were handing over command at about 00.17, by

154

1 then, further information was coming in as to reports of  
 2 shooting at Oldham Hospital?  
 3 A. Yes.  
 4 Q. It isn't apparent from any of the material that you were  
 5 aware of that during your period of command as ITFC;  
 6 can you remember?  
 7 A. I think I was aware of it, but when I became aware of it  
 8 I'm not too sure. I was under the impression that I'd  
 9 actually deployed or I was aware that firearms teams had  
 10 gone to Oldham Royal to address that.  
 11 Q. And the inquiry will hear from Chief Inspector Dexter as  
 12 to the intelligence he was receiving and how he dealt  
 13 with it.  
 14 Next topic -- sorry, had you been aware and still in  
 15 command, how would that report of shooting at  
 16 Oldham Hospital have affected your assessment as to  
 17 continuing Plato?  
 18 A. It wouldn't have affected the scene. The fact that --  
 19 the way it was reported would suggest that it's linked  
 20 because of potentially what I was thinking is, is  
 21 this -- I think Oldham Hospital was a hospital which was  
 22 receiving some of the injured, injured victims, and it  
 23 wouldn't be unreasonable to think that there was  
 24 potentially a second attack at that location for that  
 25 reason. So that would still maintain the marauding

155

1 aspect of Plato.  
 2 Q. Because ending Plato, one can't switch it on and off  
 3 like a tap operationally; is that fair way of putting  
 4 it?  
 5 A. Very much so, yes.  
 6 Q. But the decision to end Plato, whoever it technically  
 7 resides with, by the time an operation has been running  
 8 for this length of time, would it have been taken  
 9 unilaterally by a TFC or only after wider consultation  
 10 and applying JESIP with other parties?  
 11 A. I don't think that... If -- as was -- as Plato was  
 12 still in place then there wouldn't have been any further  
 13 consultation with partners on that. If there is  
 14 a marauding aspect and Plato hadn't been set up then the  
 15 TFC would automatically set up Plato again and it'd be  
 16 their authority.  
 17 Q. It's probably the fault of my question. What we have  
 18 here, after whatever period of time, is a firearms  
 19 command structure with OFCs, TFCs, SFCs.  
 20 A. Yes.  
 21 Q. The decision to end Plato in that context, where the  
 22 command structure is set up and running, would be taken  
 23 by whom? Who would take the decision?  
 24 A. That would be a consultation between the TFC and the  
 25 SFC. It certainly wouldn't have been taken by me.

156



1 SIR JOHN SAUNDERS: Did anybody ever do it? I know that  
 2 Chief Inspector Dexter suspended it, but did anyone  
 3 actually ever get rid of it?  
 4 A. I think once Mr Dexter had ---  
 5 SIR JOHN SAUNDERS: Suspended it?  
 6 A. --- suspended it, then that was sufficient. That  
 7 certainly would change the deployment aspect of  
 8 resources.  
 9 SIR JOHN SAUNDERS: Thank you.  
 10 MR DAVIES: Next topic, and I'll condense them.  
 11 Mr Greaney asked you an open question yesterday,  
 12 "What went well?" You gave your answer and you focused  
 13 on the motivations and best efforts of everybody  
 14 involved. We're limiting ourselves in chapter 10 in all  
 15 these questions to the emergency response.  
 16 Taking as read your assessment that everyone did  
 17 their best in extraordinary circumstances, objectively  
 18 quite a lot didn't go well; do you agree?  
 19 A. Yes.  
 20 Q. Failure at any point for a common rendezvous point?  
 21 A. Yes.  
 22 Q. The limitations of FCPs, if any were created at all?  
 23 A. Yes.  
 24 Q. The failure to set up tri-service radios?  
 25 A. Yes.

157

1 Q. The length of time it took to relieve you of command?  
 2 A. Yes.  
 3 Q. The quality of communications generally?  
 4 A. Yes.  
 5 Q. The total JESIP failure, to use your language,  
 6 in certain respects in the critical early stages?  
 7 A. Yes.  
 8 Q. Can we have {INQ000781/1} up, please. Because you ---  
 9 the debrief where Mr Greaney started and more or less  
 10 where I'll finish. You were asked at the bottom of the  
 11 first page:  
 12 "From your own role perspective, what aspects of the  
 13 overall incident did not go well?"  
 14 The next page, please, Mr Lopez {INQ000781/2}. You  
 15 list in a level of detail eight separate areas that did  
 16 not go well. Just scan through them again. I won't  
 17 read them out.  
 18 (Pause)  
 19 Anything in there you'd wish to change?  
 20 A. No.  
 21 SIR JOHN SAUNDERS: Your answer to (1) actually was rather  
 22 different about releasing Mr Randall.  
 23 A. Ideally, sir, I would have preferred to have kept lan  
 24 with me because we had worked regularly together and he  
 25 knew how I worked and I knew how he worked. But my

158

1 understanding of Sergeant Core's ability to be able to  
 2 open up Silver wasn't at the same level as  
 3 lan Randall's. I think that was raised as an issue, so  
 4 what I'm referring to there is the different levels of  
 5 understanding for something like Silver, but that has  
 6 been addressed, as I understand it, and training was  
 7 being put in place for all supervisors in the OCR to  
 8 know how to stand up the Silver command module.  
 9 MR DAVIES: Yes. It's simply to make the observation,  
 10 really, that insofar as your answer to Mr Greaney  
 11 focused on one element, these are objective criticisms  
 12 you make of how things actually worked on the night ---  
 13 A. Yes.  
 14 Q. --- that bluntly did not go well.  
 15 A. Yes.  
 16 Q. Just one area of expansion, please. Item (2) there:  
 17 "No Airwaves tac on duty or officially on call to  
 18 assist with the added demand on the Airwave system and  
 19 knowledge of various appropriate secondary channels."  
 20 What would the Airwaves tac have done if they were  
 21 available to you and over what time period?  
 22 A. If they'd been on duty, they would have understood ---  
 23 when you have so many police radios in one location,  
 24 that tends to overwhelm the --- or can overwhelm the  
 25 transmitters supplying that area, radio transmitters,

159

1 which can be a problem. They have the ability to change  
 2 demand and where those calls are --- where those signals  
 3 are being picked up from. I could have just said to an  
 4 Airwaves tac: right, set up, for argument's sake, the  
 5 tri-service radio and get someone to monitor that and  
 6 feed it back to me. They would have fully understood  
 7 what was required there, they would have made the  
 8 decision on which channel it was going to be. They have  
 9 that much more workable understanding of the Airwaves  
 10 system itself and that would have been immediate.  
 11 Q. Right. It may be thought surprising, to put it  
 12 neutrally, that in May2017, in circumstances where  
 13 individuals can communicate by WhatsApp, that the  
 14 emergency services in a major city in the United Kingdom  
 15 cannot coordinate in a major incident to have a tri or  
 16 more service radio immediately to hand, although the  
 17 technology existed. It had never been used, according  
 18 to Inspector Booth, operationally.  
 19 A. It hadn't.  
 20 Q. You talked of muscle memory, but what is the explanation  
 21 for the lack of use by emergency services operationally  
 22 of such communications equipment as existed?  
 23 A. It is not something that we use regularly within the  
 24 OCR. As I've said, your tri-service radios, rightly or  
 25 wrongly, tend to be utilised once Silver command has

160

1 been set up. So it is not something that we -- and  
 2 certainly I had no experience of ever setting it up and  
 3 I think I can say the same potentially for my colleagues  
 4 that it wasn't an understood practice. I know that that  
 5 was being looked at and there certainly were channels  
 6 available to use, but it's something that had never been  
 7 used in any major incident that I was involved in,  
 8 I have been involved in, within the OCR room itself.  
 9 Q. The fact they'd never been used operationally in any  
 10 major incident --  
 11 A. That I'm aware of, yes.  
 12 Q. -- between emergency services in Manchester, it looks  
 13 like a cross-organisational and cultural failure,  
 14 doesn't it, actually to put into practice some of these  
 15 JESIP principles?  
 16 A. Absolutely. If it was always or regularly used, tested  
 17 prior to that then potentially taking away issues I've  
 18 already discussed on that communication and the limited  
 19 communication I wanted, it would have been a very good  
 20 method of having that communication, very quick  
 21 communication, but it was something we never did.  
 22 Q. The moment to try it out was not in the white heat of an  
 23 appalling terrorist atrocity?  
 24 A. Absolutely not.  
 25 MR DAVIES: Thank you, sir.

161

1 SIR JOHN SAUNDERS: Thank you very much. We will break --  
 2 I'm not sure whether for supper or lunch. Would people  
 3 manage with just three-quarters of an hour? I'm aware  
 4 I only have to walk 150 yards to have my lunch and other  
 5 people need to go further and discuss things. Does  
 6 anyone have a problem with three-quarters of an hour?  
 7 MR GREANEY: I think there are some signals that no one has  
 8 a problem.  
 9 SIR JOHN SAUNDERS: We will not sit beyond 4.30, I can  
 10 assure you of that. We will get as far as we can with  
 11 Mr Randall this afternoon.  
 12 MR GREANEY: Mr de la Poer will be calling Mr Randall.  
 13 Can I mention two things before we break? First of  
 14 all, Mr Atkinson, Mr Weatherby and Mr Cooper have been  
 15 good enough to tell me that they are content that the  
 16 statement of Mr Core should either be read or published.  
 17 We're extremely grateful for that level of cooperation.  
 18 It will enable us to claw some time back next week.  
 19 If any other core participant has a problem with  
 20 that, they should tell us within the course of the next  
 21 60 minutes, otherwise he will not be called to give live  
 22 evidence.  
 23 Secondly, whilst I'm on my feet and dealing with  
 24 case management issues, we will need to sit at 9.30,  
 25 I suspect, each day next week, and certainly on Monday.

162

1 SIR JOHN SAUNDERS: Can I just assure people, we won't wait  
 2 for this long to break in future? It's not fair on  
 3 people listening.  
 4 Thank you very much for coming to give evidence to  
 5 me. Clearly there's a lot I have to think about and  
 6 you have given me a lot to think about from your  
 7 evidence. What I think we can all agree on is that on  
 8 22 May you were faced with an unprecedented situation  
 9 for which you were unprepared, through no fault of your  
 10 own, and it may be, depending on the rest of the  
 11 evidence, that the force for whom you work were also  
 12 unprepared for what happened on that particular day.  
 13 You were completely overstretched that night by the  
 14 pressures that were put on you. That again is in no way  
 15 your fault: it was the systems which were set up which  
 16 caused that and it was entirely understandable that you  
 17 became overwhelmed and doesn't reflect on you.  
 18 You will appreciate that there are other aspects of  
 19 your evidence which I will have to consider with great  
 20 care, but I think we can probably all agree with what  
 21 I have said.  
 22 Thank you very much. 3 o'clock.  
 23 (2.16 pm)  
 24 (The lunch adjournment)  
 25 (3.00 pm)

163

1 SIR JOHN SAUNDERS: Thank you.  
 2 MR DE LA POER: Good afternoon. We are going to conclude  
 3 the evidence for this week with Mr Randall.  
 4 PSS IAN RANDALL (sworn)  
 5 Questions from MR DE LA POER  
 6 MR DE LA POER: I spoke to Mr Randall before he came into  
 7 the witness box and he indicated an ability and  
 8 willingness to come back on Monday.  
 9 SIR JOHN SAUNDERS: Thank you, I'm very grateful.  
 10 MR DE LA POER: Could you please give us your full name?  
 11 A. Ian James Randall.  
 12 Q. And Mr Randall, what is your job title at the moment,  
 13 please?  
 14 A. Command and control supervisor over with Team 3, which  
 15 is the force duty supervisor's role.  
 16 Q. Is that within Greater Manchester Police?  
 17 A. It is.  
 18 Q. And are you employed by Greater Manchester Police as  
 19 a member of civilian police staff?  
 20 A. I am.  
 21 Q. Did you join GMP in 1996?  
 22 A. I did.  
 23 Q. Did you join as a civilian member of staff?  
 24 A. I did.  
 25 Q. In 2010, were you promoted to police staff supervisor?

164

1 A. Yes, I was.  
 2 Q. In 2013, did you move to the role of force duty  
 3 supervisor?  
 4 A. I did.  
 5 Q. In the course of your career at Greater Manchester  
 6 Police, had you ever received any training in JESIP?  
 7 A. I did, yes.  
 8 Q. Was that JESIP training in the form of e-learning or was  
 9 there a different sort of teaching?  
 10 A. I went on a one-day course with other emergency services  
 11 at Ladybridge Hall, that was in January 2015 or 2014,  
 12 sorry. And I think I did an NCALT e-learning package,  
 13 a couple of hours.  
 14 Q. By May 2017, do you think you had a good understanding  
 15 of JESIP or a different level of understanding?  
 16 A. Different level.  
 17 Q. What level of understanding do you think you had in  
 18 May 2017?  
 19 A. Some elements of the JESIP. That's all I had at the  
 20 time.  
 21 Q. Was the importance of JESIP at the forefront of your  
 22 mind on 22 May 2017?  
 23 A. No.  
 24 Q. And having had a chance to reflect upon that, why do you  
 25 think that is?

165

1 A. It could have been done better.  
 2 Q. What could have been done better?  
 3 A. Communication.  
 4 Q. So are you there referring to a JESIP failure, namely  
 5 a failure to follow one of the JESIP principles, which  
 6 is communication?  
 7 A. Yes.  
 8 Q. My question really was going to your state of mind. You  
 9 told us you received 1 day of training followed by  
 10 e-learning a couple of years prior to the events on  
 11 22 May 2017. You've also told us that you don't think  
 12 JESIP was at the forefront of your mind or the  
 13 importance of it was at the forefront of your mind. I'm  
 14 just trying to understand why you think it was that,  
 15 going into events on 22 May, it wasn't at the forefront  
 16 of your mind?  
 17 A. It was just extremely busy in the control room.  
 18 Q. Had you ever undertaken any exercises which had involved  
 19 you having to use the JESIP principles?  
 20 A. No.  
 21 Q. Next, Operation Plato. In May 2017 did you know what  
 22 Operation Plato was?  
 23 A. No.  
 24 Q. I'm going to just look at that in a little more detail.  
 25 Did you think you knew what Operation Plato was?

166

1 A. Not at the time, no.  
 2 Q. So was it the case that when, as we will see, you told  
 3 people that Operation Plato had been declared, had they  
 4 asked you, what is Operation Plato, you would not have  
 5 been able to give them an answer?  
 6 A. No.  
 7 Q. Did you have any sense in May 2017 that Operation Plato  
 8 was in some way related to terrorism?  
 9 A. In some way, yes.  
 10 Q. But is that about the extent of it?  
 11 A. It is.  
 12 Q. One of the roles that you played on the night of 22 May  
 13 and into the next day was that of Silver room manager.  
 14 Had you received Silver room manager training?  
 15 A. I went on a course through the OCB at the training  
 16 school for Silver control.  
 17 Q. Approximately when was that?  
 18 A. I can't remember, sorry.  
 19 Q. In relation to May 2017, was it shortly before or some  
 20 time before?  
 21 A. Some time before.  
 22 Q. Having undertaken that training, were there any  
 23 occasions when you had acted in an incident as the  
 24 Silver room manager?  
 25 A. Several times.

167

1 Q. Just give us a flavour, please, of perhaps the most  
 2 important or serious incidents for which you had been  
 3 in that role.  
 4 A. Mainly football matches. They're the regular ones that  
 5 we set up Silver controls for, public order ones. The  
 6 Conservative Party Conference in Manchester itself.  
 7 Q. Correct me if I'm wrong, but they sound on your  
 8 description all to be pre-planned operations; is that  
 9 right?  
 10 A. Yes, they are.  
 11 Q. So had you ever undertaken the role of Silver room  
 12 manager in response to an unplanned incident?  
 13 A. Not that I can recall.  
 14 Q. So far as you were aware, in May of 2017, did GMP have  
 15 on staff, whether on duty or not, anyone who had been  
 16 the Silver room manager in an unfolding incident?  
 17 A. I couldn't tell you, sorry.  
 18 Q. We're just going to talk about the role of the force  
 19 duty supervisor and we can take this very shortly  
 20 because all of the evidence that the inquiry has  
 21 received was that you were extremely well qualified  
 22 in that role, so we don't need to rehearse your  
 23 training, but I do need to ask you whether or not you  
 24 regarded yourself as being adequately trained in the  
 25 role of force duty supervisor by May 2017.

168

1 A. I believe I was.  
 2 Q. What is the role of a force duty supervisor generally?  
 3 A. We have line responsibility for the Team 3 members of  
 4 staff, which included the IMU members of staff at that  
 5 time.  
 6 Q. Can I just stop you there: that's an acronym you'll be  
 7 very familiar with, but IMU?  
 8 A. Sorry, Information Management Unit. We have a line  
 9 responsibility for them staff. We monitor any jobs that  
 10 come in for the traffic unit, which come under the  
 11 Team 3 area of business. We support the FDO in anything  
 12 he needs as part of his day-to-day business. We get  
 13 logs switched to us by the call-takers and radio  
 14 operators to make the force duty officer aware, or they  
 15 switch them to the force duty supervisor for any force  
 16 resources, and to the radio operators themselves.  
 17 Q. So all of those roles that you've described would be  
 18 relevant in, as it's often termed, a business-as-usual  
 19 situation. In relation to an unfolding incident, what  
 20 is going to be the focus of the force duty supervisor?  
 21 A. It's to assist the force duty officer and Team 3  
 22 members.  
 23 Q. Those Team 3 members, are you in authority over them in  
 24 terms of being able to give them direction?  
 25 A. I am.

169

1 Q. Is the person in authority over you the force duty  
 2 officer?  
 3 A. He's the senior officer at the time.  
 4 Q. I'd just like you to deal briefly with the set-up in the  
 5 room that you were in on 22 May. We are not going to  
 6 identify its precise location, but we've already heard  
 7 that you were at a location in Manchester.  
 8 A. I was.  
 9 Q. And that that was a location which was not at the force  
 10 headquarters; correct?  
 11 A. Yes.  
 12 Q. And about how long in a car would it take to travel  
 13 between the two?  
 14 A. About 15, 20 minutes.  
 15 Q. The room that you were in -- we've heard from  
 16 Chief Inspector Sexton that you had a desk next to the  
 17 force duty officer. Using the dimensions of this room  
 18 so, far as you can, just give us an idea of how close.  
 19 Were you within touching distance or was it further than  
 20 that?  
 21 A. Touching distance.  
 22 Q. Did the two of you sit on a raised area?  
 23 A. We did.  
 24 Q. And was anybody else on the raised area?  
 25 A. No.

170

1 Q. Were the radio operators, so far as you were concerned,  
 2 within speaking distance?  
 3 A. Yes, they were.  
 4 Q. Having dealt with that, I'm going to invite your  
 5 comments on the Greater Manchester Police major incident  
 6 plan.  
 7 By May of 2017, was that a document that you had  
 8 ever seen?  
 9 A. No.  
 10 Q. This no doubt will be an obvious answer that you will  
 11 give, but had you ever received any training in relation  
 12 to its contents expressly?  
 13 A. No.  
 14 Q. In the period 1996 through to 2017, were you ever aware  
 15 that GMP had a major incident plan?  
 16 A. No.  
 17 Q. But sitting there now, it is a document that you have  
 18 seen; is that correct?  
 19 A. I've seen parts of it.  
 20 Q. And that is because you were invited, I think yesterday  
 21 afternoon, to consider some specific pages from within  
 22 it --  
 23 A. Yes.  
 24 Q. -- to see if you could help us today with some of its  
 25 content. As I explore this with you, we will all bear

171

1 in mind that you had not read that document or even  
 2 known of its existence in May of 2017.  
 3 Mr Lopez, can you please bring up {INQ007279/1}.  
 4 We can go to page 1 to see the front cover and get  
 5 our dates established. You'll see in front of you,  
 6 Mr Randall, that we are looking at version 1.5, which  
 7 indicates on it that the "Emergency Planning Unit --  
 8 Specialist Operations" are the author. And those who  
 9 have been following the inquiry closely will recall  
 10 having heard from a Police Constable Hughes during  
 11 chapter 7 who worked for that unit.  
 12 Then we can see the branch date of review was  
 13 March 2017 and the date of next review was March 2019.  
 14 As I understand it, this was the version in force in May  
 15 of 2017.  
 16 As we will hear when we come to 22 May, and the  
 17 events on that evening, one of the roles that you played  
 18 was to set up the Silver room; is that right?  
 19 A. It was.  
 20 Q. The major incident plan does refer to that room at  
 21 various points, so we're just going to have a look and  
 22 see what the major incident plan has about it and see  
 23 whether that fits with your understanding in May or  
 24 whether there's any difference.  
 25 So first, Mr Lopez, {INQ007279/18}. We can see the

172

1 tactical control room is identified there. Would that  
 2 be another way of describing the Silver room?  
 3 A. It possibly could.  
 4 Q. Let's see what it says there:  
 5 "The tactical control room should house the  
 6 resources required to effectively manage a fast-moving  
 7 incident. This includes an intelligence cell linked to  
 8 social media through non-identifiable channels to gather  
 9 useful information from social media..."  
 10 And it goes on and talks about particular powers  
 11 that are required if information is to be obtained in  
 12 a certain way. So that's a first reference to what  
 13 might be the Silver room.  
 14 Whether it is or it isn't, if we look next at  
 15 {INQ007279/25}, we can see towards the top left-hand  
 16 corner that when the command and control structure is  
 17 set out, one of those indicated is scene tactical  
 18 commander and Silver control. Would Silver control be  
 19 a way of correctly identifying the room that you were  
 20 setting up?  
 21 A. It would.  
 22 Q. We can see there that it is being spoken about in the  
 23 context of the tactical commander on scene.  
 24 Next, {INQ007279/57}, please. Here in the first  
 25 paragraph, we see reference to the Silver control room,

173

1 and let's just have a look and see what it says:  
 2 "During an initial response to a major incident, the  
 3 divisional channel will be utilised but as soon as  
 4 practicable the Silver control room should set up  
 5 a dedicated radio channel."  
 6 So there, again a reference to the room that you set  
 7 up and one of the first things to be done, certainly as  
 8 soon as reasonably practicable, within that room. Would  
 9 setting up a dedicated radio channel be something that  
 10 could be done in the OCR that you were working in on  
 11 22 May?  
 12 A. Not at the time.  
 13 Q. Was that something that could be done in the Silver room  
 14 at the time?  
 15 A. In the Silver control room at force headquarters, yes.  
 16 Q. Yes. So if that was to be done, it would have to be  
 17 done there?  
 18 A. Yes.  
 19 Q. As we're looking at this document, and we're moving  
 20 through it, through the pages, I'm just going to step  
 21 away from the Silver control room and now look at  
 22 {INQ007279/60} and just see a reference to the OCR.  
 23 The top paragraph:  
 24 "The interoperability Talk Groups need to be  
 25 monitored by the OCR and each service's forward command

174

1 post (or equivalent). However, each service will manage  
 2 their own response to and management of the incident in  
 3 accordance with established command and control  
 4 protocols."  
 5 So in the OCR you were working in, was there  
 6 a facility to monitor the interoperability Talk Group?  
 7 A. I believe there was.  
 8 Q. Was that used on the night, so far as you were aware?  
 9 A. No.  
 10 Q. We will, as you answer that question, just remind  
 11 ourselves that you left at about 11.20, didn't you?  
 12 A. Yes, sir.  
 13 Q. {INQ007279/76}. Again, the top:  
 14 "To provide sustainable resilience require the  
 15 Silver control room to be opened and staffed."  
 16 So this is forming in a list and we can see what it  
 17 has to say about it:  
 18 "By opening a Silver control room remote from the  
 19 incident, resilience to the command and control over the  
 20 incident can be maintained. A fully staffed Silver  
 21 control room will provide an effective route for  
 22 communication and access to senior officers. Gold  
 23 control and the various resources available throughout  
 24 the force area and not immediately contactable from the  
 25 scene."

175

1 Although you hadn't seen this document at the time,  
 2 is that the same or different from your understanding of  
 3 the function of or part of the value of a Silver control  
 4 room?  
 5 A. It's a function.  
 6 Q. And is that how you understood it in May 2017?  
 7 A. It was.  
 8 Q. Then the final document I would like you to look at in  
 9 here is at {INQ007279/82} and following, which gives the  
 10 description of the Silver control room manager.  
 11 We'll just read out because it's only a short  
 12 section. We can see the rank is indicated at inspector,  
 13 chief inspector or police staff supervisor. You were  
 14 the latter of those; is that correct?  
 15 A. It is.  
 16 Q. Then it says this:  
 17 "During a major incident, the Silver control room  
 18 will be remote from the vicinity of the incident itself.  
 19 It will, by its very existence, provide resilience to  
 20 the tactical commander at the scene, providing primarily  
 21 an administration function, recording the decisions and  
 22 rationales of the various commanders. It will provide  
 23 a direct link to Gold control and the strategic  
 24 commander carrying out orders passed from both Gold and  
 25 Silver level. Silver control will provide

176

1 a communication function between the various emergency  
 2 services and supporting agencies involved in the  
 3 incident and will be a focal point at which command  
 4 support staff from those services and agencies can  
 5 approach for advice and assistance without distracting  
 6 the tactical commander at the scene. Silver control  
 7 will also be responsible for processing the requests and  
 8 orders of the tactical commander. From the Silver  
 9 control room any additional staff and equipment required  
 10 will be resourced and their deployment recorded. The  
 11 role of the Silver control room manager is to manage  
 12 these duties. Below is a checklist to assist you in  
 13 your role."

14 We'll leave aside the checklist for a moment, but  
 15 is that the same or different to your understanding of  
 16 the role of Silver control room manager as it was in  
 17 May 2017?

18 A. I think it was -- part of it's what I carried out on the  
 19 evening and what I was expected. As I say, that's the  
 20 first time I've seen that at all.

21 Q. Is there anything identified in there that you didn't  
 22 believe was within your role?

23 A. No.

24 Q. Is there anything not identified in there that you did  
 25 think was within your role?

177

1 A. (Pause). I think I did most of what's -- part of the  
 2 role was given to me on the evening.

3 Q. So would you say this is a fair description of what you  
 4 thought you were there to do when you got to force HQ?

5 A. It is.

6 SIR JOHN SAUNDERS: Tactical commander is Silver?

7 A. I believe so, yes, sir.

8 SIR JOHN SAUNDERS: You had Silver in the room with you?

9 A. Yes.

10 SIR JOHN SAUNDERS: So where this talks about "tactical  
 11 commander at the scene" that's either a different person  
 12 or it's anticipating the Silver being at the scene  
 13 rather than with you?

14 A. Usually, sir, the tactical commander and the Silver  
 15 commander is in the Silver control.

16 SIR JOHN SAUNDERS: Right.

17 MR DE LA POER: And usually, in your experience, is there  
 18 a Silver commander on the scene?

19 A. No, sir.

20 Q. So in the sense that it's described here, that is  
 21 different to your ordinary expectation?

22 A. It is.

23 Q. We can see a checklist which is identified. Had you  
 24 ever seen a checklist of that type before?

25 A. No.

178

1 Q. So you didn't work to a checklist on 22 May; is that  
 2 right?

3 A. That's correct.

4 Q. Having had an opportunity to look at the checklist, are  
 5 those all activities that were within your role as you  
 6 understood it in May 2017?

7 A. I could have assisted but not usually.

8 Q. You could have assisted?

9 A. Assisted.

10 Q. So are you saying that you would expect other people to  
 11 carry out this role and you would help them?

12 A. Yes.

13 Q. We've heard in the inquiry about the concept of the  
 14 golden hour. Was that a concept that you were familiar  
 15 with when working in May of 2017?

16 A. It was.

17 Q. Obviously, the golden hour can apply to all sorts of  
 18 different incidents and the important activities in the  
 19 first hour of a missing person case or a murder may be  
 20 different to the sort of incident we were dealing with  
 21 here. But in May 2017, did you have an understanding  
 22 that the first hour was absolutely critical?

23 A. Yes, sir.

24 Q. Looking down that list of the tasks that you could  
 25 assist with and --

179

1 SIR JOHN SAUNDERS: We haven't actually got them all on the  
 2 screen.

3 MR DE LA POER: I'm so sorry, I'm working from a hard copy.  
 4 Let's take a step back.

5 Mr Lopez, can you scroll down? I'm talking about  
 6 the checklist that is visible there. I asked you quite  
 7 an unfair question and I'm sorry for that. It wasn't my  
 8 intention because I asked you to look at the list and  
 9 you can only see the top two entries.

10 You can see that there are various tasks if you have  
 11 a look at the left-hand column which gives a summary of  
 12 what they are.

13 Then if we go over the page {INQ007279/83}, we can  
 14 see -- there's one more, "Welfare". And if we scroll  
 15 down, there's an aide-memoire. Were you working to that  
 16 aide-memoire or something similar on the night?

17 A. No.

18 Q. Then we can see the top entry is "forward control post"  
 19 and if we go across, so the next page {INQ007279/84},  
 20 Mr Lopez, I think we'll see the end of that table. All  
 21 right? So you can see what's on it, but you didn't have  
 22 that in front of you?

23 A. No.

24 Q. At the time -- so if we can just go back two pages  
 25 {INQ007279/82}, please, Mr Lopez -- and we'll bear in

180

1 mind that the list we see there also includes welfare  
 2 over the page. Having had a look at that list, are any  
 3 of those actions what you would view as golden hour  
 4 actions?  
 5 A. Possibly, but I've never seen the list before so  
 6 I wouldn't...  
 7 Q. But are those tasks that you in May 2017 thought were  
 8 within your role as the Silver room manager?  
 9 A. No.  
 10 Q. They're not?  
 11 A. I didn't know about the list.  
 12 Q. I appreciate you didn't know about this list, but did  
 13 you know about the information in the list in some other  
 14 form?  
 15 A. No.  
 16 Q. All right. Well, I'm sure I've taken that as far as  
 17 I can.  
 18 That can be taken down from the screen, thank you,  
 19 Mr Lopez.  
 20 We've been speaking about the Silver control room  
 21 and I think it's important for people to have a mental  
 22 picture of what that room is. So we'll start in this  
 23 way. It's based at force headquarters; is that right?  
 24 A. It is.  
 25 Q. That is a building that was opened in 2011 or

181

1 thereabouts?  
 2 A. It was.  
 3 Q. The Silver room, is it, as it sounds, a single room?  
 4 A. It's a large room, where we've got dividers just to  
 5 cordon it off for small events or it can be opened up to  
 6 include the Gold commander's suite.  
 7 Q. So the Gold commander has a room which is separated by  
 8 a wall that can be removed if required?  
 9 A. It is.  
 10 Q. Within the Silver room, is there a place for the  
 11 Silver commander to sit if they are there?  
 12 A. Yes, there is.  
 13 Q. Is there a place for representatives of other emergency  
 14 services to sit?  
 15 A. Yes, there is.  
 16 Q. Is there space for radio operators, such as are found in  
 17 the OCR?  
 18 A. Yes, there is.  
 19 Q. Is there a space for the Silver room manager?  
 20 A. Yes, there is.  
 21 Q. Is there a space within that room for any person or  
 22 group of people that I haven't yet identified?  
 23 A. Yes, there is.  
 24 Q. Who are they, please?  
 25 A. You could have further radio operators, you could have

182

1 senior officers that come downstairs. There's always  
 2 spare banks of radios and ICCS machines, that's the  
 3 communication radio, just in case any faults are on, so  
 4 we can move the staff around.  
 5 Q. So flexibility for additional people as an incident  
 6 might require?  
 7 A. It is, yes.  
 8 Q. Did the previous headquarters, or whatever was the  
 9 predecessor to what is now force HQ, have a Silver room?  
 10 A. It did.  
 11 Q. Had you ever operated in that room, so the predecessor  
 12 to the one that is relevant to the night, or have you  
 13 only ever operated within the one in force HQ?  
 14 A. We had a purpose-built Silver control room at the  
 15 training school for GMP when the first time,  
 16 I believe -- the Operation Protector came for the  
 17 Labour Party Conference.  
 18 Q. Had you ever conducted exercises setting up the Silver  
 19 room at force HQ?  
 20 A. No.  
 21 Q. As you've told us, you yourself had never set up  
 22 a Silver control room during an incident?  
 23 A. No.  
 24 Q. But presumably, you had set it up in slow time ahead of  
 25 a pre-planned operation?

183

1 A. Yes.  
 2 Q. We've heard, at least hinted at, given we've seen two of  
 3 the conversations that he was involved in, that the  
 4 Night Silver was not in the Silver room at the time that  
 5 you first spoke to him; is that your understanding?  
 6 A. It is.  
 7 Q. We can explore with Superintendent Nawaz where he was  
 8 and why he was there, but from your point of view as  
 9 somebody who on that night had to go to the Silver room  
 10 to set it up, is there any good reason that you are  
 11 aware of, and obviously others can have some input on  
 12 this, why Night Silver couldn't be based in the Silver  
 13 room so that if an incident occurred they would already  
 14 be in at least one of the places that they might be for  
 15 the incident?  
 16 A. They could have been, yes.  
 17 Q. We'll explore that further with Superintendent Nawaz and  
 18 I'm sure that GMP will also consider whether there are  
 19 any other good reasons, perhaps outside your sphere of  
 20 understanding, as to why that might or might not be  
 21 a good idea.  
 22 So setting up a Silver room from a standing start.  
 23 What are the actions that you would have to do to set it  
 24 up? We'll start from the baseline. The lights are off.  
 25 Are the computers on?

184

1 A. The computers are always there so they just need to be  
 2 turned on.  
 3 Q. So they need to be switched on. The furniture is all  
 4 arranged ready?  
 5 A. It is.  
 6 Q. What are the other steps to set it up from position when  
 7 it wasn't in use to when it's ready to take command of  
 8 an incident?  
 9 A. It's to get the staff embedded, especially for the OCR,  
 10 the radio operators, make sure they're comfortable,  
 11 ready to start work, hopefully try to get them to read  
 12 through the incident itself, get them up to date with  
 13 what's going on, make sure people who are arriving at  
 14 Silver from the other agencies, make sure they're aware  
 15 and guide them to their seats or anything else they  
 16 need.  
 17 Q. In your view, and we know that you were the person who  
 18 did it on the night and we'll come to the reasons for  
 19 that, are those tasks which require, in a serious  
 20 incident such as this, a high degree of experience and  
 21 knowledge or is it something that somebody who had  
 22 simply acted in the role before would be competent to  
 23 do?  
 24 A. I'm unsure of that, sir. It's just what I know, how  
 25 to -- what -- my training for trying to set up Silver at

185

1 slow time...  
 2 Q. Was there, so far as you were aware, any plan in place  
 3 as to who, whether by name or by role or by rank, would  
 4 go to the Silver room to set it up in the event of an  
 5 unexpected incident?  
 6 A. I know someone who can do that and I actually called  
 7 them on the evening, as I said in my statement, and they  
 8 got other key members of staff for the Silver team to  
 9 come into the room.  
 10 Q. What I was really driving at, and it'll be my bad  
 11 question, Mr Randall, is whether there was a plan, so in  
 12 other words, when everybody went on shift that night was  
 13 it known that if there was an incident, these people  
 14 will set up Silver?  
 15 A. No.  
 16 Q. But it was known that somebody would need to set up  
 17 Silver?  
 18 A. Yes, sir.  
 19 Q. But there had been no exercising as to how that might  
 20 work in practice; is that correct?  
 21 A. Correct.  
 22 Q. And in fact, there had been -- had there been any  
 23 discussion about who might do it?  
 24 A. On the evening?  
 25 Q. Before the evening.

186

1 A. No.  
 2 Q. And having had the experience that you have had, do you  
 3 think that having such a plan in place about the people  
 4 or the roles that might be expected to be the first to  
 5 go to Silver, possibly a plan with some resilience so  
 6 that there were fallback options, would have helped on  
 7 the night?  
 8 A. Yes, it would.  
 9 SIR JOHN SAUNDERS: So it was who went to set up it and who  
 10 was going to go there, no one did anything about it or  
 11 thought about it before the incident started?  
 12 A. No.  
 13 SIR JOHN SAUNDERS: Okay. There was a slight ambiguity  
 14 about whether it could have been earlier on the evening.  
 15 MR DE LA POER: Yes. Again, my bad question.  
 16 Mr Randall, we are now going to look at the events  
 17 of 22 May 2017 and we're going to do it in two parts.  
 18 The first part is going to cover you in the OCR and  
 19 then, in fairly summary form, we're going to look at the  
 20 period after that.  
 21 So you were at work in the OCR in Manchester on the  
 22 evening of 22 May; is that correct?  
 23 A. I was.  
 24 Q. And you were in your role as force duty supervisor,  
 25 sitting next to Chief Inspector, inspector as he was

187

1 then, Sexton?  
 2 A. Yes, I was.  
 3 Q. Had you worked with him before?  
 4 A. I had.  
 5 Q. Did you have a good working relationship?  
 6 A. I did -- I do, sorry.  
 7 Q. In your first witness statement you say that you became  
 8 aware of an incident at Manchester Arena at 22.34;  
 9 is that correct?  
 10 A. It is.  
 11 Q. Do you have to hand a schedule like that (indicating)?  
 12 A. No.  
 13 Q. You don't? Right. That is a matter of some regret, but  
 14 it'll be my oversight for not --  
 15 SIR JOHN SAUNDERS: Is that the same as this (indicating)?  
 16 MR DE LA POER: If that is the one which has the entry 1626  
 17 in the top corner of the first page -- it doesn't look  
 18 very promising. We'll do it another way. There will be  
 19 no difficulty and I'm sure someone will be listening and  
 20 arranging for that to happen.  
 21 But I know that you have a huge degree of  
 22 familiarity, is that fair to say, with a lot of the  
 23 audio in this case?  
 24 A. I do, sir.  
 25 Q. Is that because, as you told me earlier, you were one of

188



1 those who Greater Manchester Police tasked to listen to  
 2 the audio in order to identify who speakers were?  
 3 A. I was, sir.  
 4 Q. So —  
 5 SIR JOHN SAUNDERS: And you have done a fairly remarkable  
 6 job, if I may say so.  
 7 A. Thank you.  
 8 MR DE LA POER: It's very important that if at any stage you  
 9 don't know what I'm talking about or you're unsure that  
 10 you say so, but I have some confidence that you will  
 11 know the conversations I'm talking about because you  
 12 deal with them in your witness statement and I'm sure  
 13 you have thought about them since.  
 14 (Pause)  
 15 I can tell you where new are speaking to because he  
 16 deals with it from paragraph 20, from page 5. If you  
 17 want to turn that up as well, Mr Randall. Do you have  
 18 that?  
 19 A. I do.  
 20 Q. We can see at paragraph 21 that, having identified that  
 21 you in the previous paragraphs had become aware of the  
 22 incident and go on to say:  
 23 "The room was just inundated with calls."  
 24 You will see that at paragraph 20, you say that:  
 25 "[Your] first action was to contact traffic

189

1 supervision, informing the duty sergeant of the  
 2 circumstances and the reasons why there would be  
 3 a request for everyone who was free to start making  
 4 their way towards Manchester Arena."  
 5 You give the reasons for that in the previous  
 6 paragraph. Tell us why that was your first action.  
 7 A. We just needed — with something like this happening,  
 8 we would have needed traffic patrols to go to the area  
 9 and try and get some road closures on in case anyone  
 10 needed to get there, any emergency services.  
 11 Q. Did you just do that of your own volition or was that an  
 12 instruction you received from the FDO?  
 13 A. No, I did that myself.  
 14 Q. Did you then make a general call for all free patrols to  
 15 start making their way to Manchester Arena?  
 16 A. On the force-wide channels, yes.  
 17 Q. Again, of your own initiative?  
 18 A. It was.  
 19 Q. Is that exactly the sort of support that you are trained  
 20 and expected to give to the FDO?  
 21 A. Yes.  
 22 Q. Did you continue to monitor the log?  
 23 A. I did, sir.  
 24 Q. Then we'll come to the first of the conversations that  
 25 I want to speak to you about, which are contained in the

190

1 schedule, which you deal with at paragraph 25, so you'll  
 2 see what you say about that.  
 3 SIR JOHN SAUNDERS: Before you do that, if you're calling in  
 4 all free patrols, might you just be inundated with cars  
 5 attending?  
 6 A. It's just the traffic patrols, sir, and —  
 7 SIR JOHN SAUNDERS: What sort of numbers would we be talking  
 8 about there?  
 9 A. Not that many, sir, to be honest.  
 10 SIR JOHN SAUNDERS: Right, okay.  
 11 MR DE LA POER: The first person — not the first person but  
 12 the person you spoke to at 22.38.24 you identify as  
 13 Jeanette McMurdo.  
 14 A. Yes.  
 15 Q. Why did you call Jeanette McMurdo?  
 16 A. Because I know she's a very good radio operator.  
 17 Q. And was she an equivalent of you as a force duty  
 18 supervisor or did she have a role below that?  
 19 A. A role below, a radio operator.  
 20 Q. Was she the same person or a different person that you  
 21 referred to earlier as being someone who could set up  
 22 a Silver room?  
 23 A. No, she can't.  
 24 Q. She can't?  
 25 A. No.

191

1 Q. So that was somebody different? We'll come back to that  
 2 person in due course.  
 3 I'm just going to remind you of part of what you say  
 4 and I'm sure you'll be able to confirm it from your  
 5 recollection. In your conversation with Ms McMurdo you  
 6 say:  
 7 "I know it's a bad thing but would you be happy to  
 8 stay on a bit extra if I have to open a Silver?"  
 9 So does it follow from that that even by 22.38 it  
 10 was in your mind that the Silver room would need to be  
 11 opened up?  
 12 A. It was, yes.  
 13 Q. The exact phrase that I have just read out to you is,  
 14 "I have to open a Silver". That's what you said at the  
 15 time. Even at that early stage was it in your mind that  
 16 the person who would do that would be you?  
 17 A. I couldn't tell you at that time.  
 18 Q. So at the stage at which you spoke to Ms McMurdo had you  
 19 spoken to the FDO about the Silver room?  
 20 A. Before that I don't think I had.  
 21 Q. Over the page in your witness statement. You indicate  
 22 that:  
 23 "[You] spoke to the FDO and you had a brief  
 24 conversation and decided between us it would be prudent  
 25 to begin setting up Silver control."

192

1 Sitting there now, is that how you recall it?  
 2 A. Yes.  
 3 Q. When you had this conversation, and this is the first  
 4 time that you spoke to the FDO about the Silver control,  
 5 did that conversation touch on when the room would be  
 6 set up?  
 7 A. I don't think it did.  
 8 Q. Did it touch on who would set the room up?  
 9 A. I couldn't remember.  
 10 Q. The next call—out you deal with at your paragraph 27,  
 11 which is to speak to the force duty Silver commander,  
 12 Superintendent Nawaz. Again, I regret that you don't  
 13 have it in front of you, but I'll read out slowly the  
 14 relevant part:  
 15 Can you confirm that in that conversation, which  
 16 began at 22.39.21, that you told him that there were  
 17 reports of an explosion in the foyer of  
 18 Manchester Arena?  
 19 A. I believe I did.  
 20 Q. Did you indicate that a lot of people were going to go  
 21 down there from GMP?  
 22 A. Yes.  
 23 Q. And that there was a report, as you understood it, at  
 24 that time, of a significant number of people who were  
 25 injured?

193

1 A. I believe so, yes.  
 2 Q. Did he ask you, "Are BTP there"?  
 3 A. I believe he did.  
 4 Q. Did you in the course of the conversation say this to  
 5 him:  
 6 "We will have a Silver opened if that's okay with  
 7 you."  
 8 A. I believe I did.  
 9 Q. Finally, so far as that conversation was concerned, and  
 10 we will look at this in detail, so we don't need to do  
 11 so with you, with Superintendent Nawaz, did he indicate  
 12 to you that he was going to look at the FWIN and that he  
 13 might give Debbie Ford a ring?  
 14 A. Yes, sir.  
 15 Q. Next, taking into account the duties that you performed  
 16 that night, did you contact the National Police Air  
 17 Service?  
 18 A. I did.  
 19 Q. We don't need to go into the detail of it, but at that  
 20 early stage of the incident, and this call was timed for  
 21 everyone's note at 22.41.57, you deal with it in  
 22 paragraph 29, did you have in mind that there was  
 23 a possibility that a helicopter might be needed?  
 24 A. Yes, sir.  
 25 Q. Next, we're going to deal with a call that you made at

194

1 22.44.23. For this, Mr Lopez, we can bring up  
 2 a transcript, {INQ018839T/8}.  
 3 If we crop into the lower part of the page, do we  
 15:45:27 4 see at counter time 00:14:24, you say:  
 4 "Ma'am, it's Ian Randall."  
 5 A. Yes.  
 6 Q. We can see in the course of this transcript that you  
 7 notify her of an explosion. Why were you calling  
 8 Rachel Buckle?  
 9 A. Because she was on the contact list that the FDO gave to  
 10 me.  
 11 Q. At the bottom you can see:  
 12 "The Night Silver's aware."  
 13 Is that a reference back to you conversation with  
 14 Superintendent Nawaz?  
 15 A. It is.  
 16 Q. "The FDO's absolutely mad busy at the moment. He's  
 17 asked me to give you a ring."  
 18 And then over the page {INQ018839T/9}, cropping into  
 19 the top, we can see that Chief Inspector Buckle asks if  
 20 anyone was injured and you inform her — we can take  
 21 that down, thank you very much indeed — and you go on  
 22 to indicate that it was an Ariana Grande concert.  
 23 SIR JOHN SAUNDERS: And we have been through it before,  
 24 so —

195

1 MR DE LA POER: Absolutely.  
 2 SIR JOHN SAUNDERS: A perfectly adequate synopsis,  
 3 thank you.  
 4 MR DE LA POER: Next, did you speak to Jeanette McMurdo?  
 5 A. Yes.  
 6 Q. That's 22.45. And then we get to 22.47, and the  
 7 declaration of Operation Plato. You've already told us,  
 8 so we don't need to go over it, you were aware that  
 9 Operation Plato was declared; is that right?  
 10 A. I was, sir.  
 11 Q. But as you've told us, beyond being something to do with  
 12 terrorism, you didn't know what that meant?  
 13 A. Correct.  
 14 SIR JOHN SAUNDERS: Are you ringing people in a particular  
 15 order?  
 16 A. It was just on the list, sir.  
 17 SIR JOHN SAUNDERS: Is Gold not on the list?  
 18 A. They are, but Mr Nawaz, I thought —  
 19 SIR JOHN SAUNDERS: He said he was going to do it?  
 20 A. Yes.  
 21 SIR JOHN SAUNDERS: Otherwise — would you always ring  
 22 Silver before Gold?  
 23 A. Gold is usually on — the Night Silver, sir, the Silver  
 24 commander who's on duty, so phone them first for them to  
 25 speak to Ma'am Ford or ring back the force duty officer.

196

1 SIR JOHN SAUNDERS: Okay, thank you.  
 2 MR DE LA POER: Then following that declaration, you deal  
 3 with this at paragraph 33, we don't need to go into the  
 4 detail, we've looked at it in some detail already today  
 5 with Chief Inspector Sexton, did you contact the press  
 6 office?  
 7 A. I did, sir.  
 8 Q. And why did you do that?  
 9 A. It was one of the persons on the list.  
 10 SIR JOHN SAUNDERS: Is there a list prepared every night of  
 11 the relevant people?  
 12 A. Every morning, sir.  
 13 SIR JOHN SAUNDERS: Every morning? Okay.  
 14 MR DE LA POER: The schedule has now arrived, although  
 15 we were doing adequately with your statement. I'll  
 16 refer to you that when we need to have a look at it,  
 17 Mr Randall, so you don't need to trouble yourself at the  
 18 moment.  
 19 The press office were on your list. After that, did  
 20 you contact Laura Lewis?  
 21 A. I did.  
 22 Q. Who is Laura Lewis?  
 23 A. She's GMP's Airwave lead and she's the force command  
 24 module manager, which is where the Silver control is  
 25 based.

197

1 Q. I think you indicate that in your statement at  
 2 paragraph 34 that you knew she was the person who could  
 3 make the necessary arrangements to fully staff Silver as  
 4 swiftly as possible.  
 5 A. Yes, sir.  
 6 Q. Is she somebody who could set up Silver control?  
 7 A. She is, sir.  
 8 Q. And was she on duty?  
 9 A. No, she wasn't.  
 10 Q. Next, as we can see in your statement at paragraph 37,  
 11 did you speak to Detective Chief Superintendent  
 12 Denise Worth?  
 13 A. I did.  
 14 Q. Was she the on-duty SIO?  
 15 A. She was.  
 16 Q. That for everybody's note is 22.57.56; is that right?  
 17 A. It is, sorry.  
 18 Q. Then were you contacted by Superintendent Nawaz?  
 19 A. I was, sir.  
 20 Q. And what passed between you in that conversation?  
 21 A. As I said there, we had a discussion. He told us he  
 22 needed a command and control room, I think it was.  
 23 Q. If you want to see the -- in the audio schedule we have  
 24 it is entry 3617 in the left-hand column, so if you want  
 25 to refresh your memory from that, we can deal with it in

198

1 summary form just for everybody to understand how this  
 2 incident was unfolding from your point of view and to  
 3 set the scene for when others come to give evidence.  
 4 Do you have that entry?  
 5 A. I do.  
 6 Q. Having had a look at what passed between you, how would  
 7 you summarise that conversation?  
 8 A. Everything that the Silver commander asked me on there  
 9 for the contacts, they'd already been contacted, the  
 10 press office ... Denise Worth, I had told him, he was  
 11 already aware, and the senior officer I already called  
 12 out.  
 13 Q. So in a sense you were ahead of Superintendent Nawaz in  
 14 terms of his to-do list, your to-do list had already  
 15 been completed so far as those requests were concerned?  
 16 A. Yes, sir.  
 17 SIR JOHN SAUNDERS: But you are duplicating jobs?  
 18 A. I was just asked to phone --  
 19 SIR JOHN SAUNDERS: I'm not complaining about you doing it,  
 20 but the reality is you were both doing the same thing?  
 21 A. I believe so, yes.  
 22 MR DE LA POER: Wasn't Superintendent Nawaz asking you if  
 23 you had done those?  
 24 A. Yes.  
 25 Q. So in a sense is it right --

199

1 A. He said he was trying to get through to the press office  
 2 and I informed him I'd already done that and then  
 3 I informed him of all the other people that I contacted.  
 4 SIR JOHN SAUNDERS: (overspeaking) they were duplicated?  
 5 MR DE LA POER: Yes, sir, quite.  
 6 So having spoken to Superintendent Nawaz, what you  
 7 say in your statement is that you spoke to the FDO, here  
 8 I'm looking at paragraph 39, about the explosives dog?  
 9 A. It is.  
 10 Q. And then we reach a stage where at 23.06 -- and here I'm  
 11 looking at the schedule, it's entry 4500, do you have  
 12 that?  
 13 A. Sorry, what's -- sorry?  
 14 Q. 23.06.  
 15 SIR JOHN SAUNDERS: Entry 4500.  
 16 A. I have got that, sorry.  
 17 MR DE LA POER: Was this you arranging transport to Silver?  
 18 A. It is.  
 19 Q. 23.10.36, we can see this is entry 4950. Do you have  
 20 that?  
 21 A. I do.  
 22 Q. 4950 contains -- is captured on Inspector Sexton's, as  
 23 he was, dictaphone and you are recorded as saying:  
 24 "Yeah."  
 25 Andrew Core, Sergeant Core says:

200

1 "Why don't instead of Tom..."  
 2 And then you are recorded as saying:  
 3 "At least I know where I'm up to, all the bits and  
 4 pieces, do you know what I mean?"  
 5 A. Yes, I can see that.  
 6 Q. Firstly, who is Sergeant Andrew Core?  
 7 A. Sergeant Andrew Core is also a supervisor sergeant in  
 8 the control room.  
 9 Q. Why were you speaking to him?  
 10 A. He was on duty also on the same evening.  
 11 Q. What was the purpose of the conversation?  
 12 A. He was coming over -- I can't believe (sic) what it was  
 13 about, but he was always coming over to speak to me  
 14 in that evening.  
 15 Q. The suggestion "why don't instead of Tom" from him and,  
 16 "At least I know where I'm up to with all the bits and  
 17 pieces, do you know what I mean", is that a reference to  
 18 discussing who might go to Silver?  
 19 A. Possibly not, but I can't remember, sorry.  
 20 Q. But certainly would it be right to say that you know  
 21 where you're up to with all the bits and pieces so far  
 22 as setting up Silver was concerned?  
 23 A. Yes.  
 24 Q. I think we can see before we leave this entry that  
 25 whilst you two are speaking, at either side of that

201

1 record we can see Inspector Sexton is on the telephone  
 2 to someone; do you see that?  
 3 A. Yes.  
 4 Q. We're going to move forward to 23.12.36, audio schedule  
 5 5160. I think in the course of this conversation, if  
 6 you have it, the important thing for us to look at --  
 7 and we'll hear in due course from Superintendent Hill --  
 8 is that you are speaking to Superintendent Hill; do you  
 9 agree?  
 10 A. Sorry, which time was it?  
 11 Q. 23.12.36.  
 12 A. Yes.  
 13 Q. You tell him that an Operation Plato has been declared?  
 14 A. Yes.  
 15 Q. Is that right?  
 16 A. It is.  
 17 Q. Why were you speaking to Superintendent Hill?  
 18 A. Superintendent Hill was a member of the OCB senior  
 19 leadership team at the time.  
 20 Q. Were you updating him effectively as your line manager?  
 21 A. No, he phoned into the control room.  
 22 Q. And at that time did you know from anybody whether or  
 23 not he was going to play a command role in the incident?  
 24 A. I didn't, sir.  
 25 Q. The final entry on the schedule to look at is 5734 just

202

1 to give us a final time. You're identified as speaking  
 2 in the background of Mr Sexton's dictaphone, 23.18.32,  
 3 so we know that you're still in the OCR at that point  
 4 but that's the last entry?  
 5 A. Yes.  
 6 Q. Would that fit with you leaving very shortly after that  
 7 record?  
 8 A. Possibly, yes, sir.  
 9 Q. You can take it from me that Sergeant Core, the first  
 10 time he appears in a radio transmission that I have been  
 11 able to identify is 23.21 in an exchange in which he  
 12 asks where the RVP point is, so would that fit with the  
 13 transition from you to him as FDS?  
 14 A. Yes.  
 15 Q. Did you go to the Silver room?  
 16 A. I did.  
 17 Q. How long did it take you to travel?  
 18 A. About 15 minutes.  
 19 Q. Again you can take it from me that I think you are first  
 20 mentioned in the log, which I am sure you have had a  
 21 chance to look at yourself, at 23.38. Would that fit  
 22 with your approximate arrival time?  
 23 A. Yes, sir.  
 24 Q. Was Superintendent Nawaz there?  
 25 A. I don't believe he was.

203

1 Q. In your first thorough statement, if I may say so, you  
 2 don't indicate at any point speaking to  
 3 Superintendent Nawaz at force HQ. Is that because there  
 4 were no conversations between you once you'd arrived?  
 5 A. That's correct.  
 6 Q. Were you expecting for the Night Silver to have arrived  
 7 by the time you got there?  
 8 A. Yes, sir.  
 9 Q. Did you make any effort to find out where the Silver  
 10 commander was?  
 11 A. No, sir.  
 12 Q. Had anybody said anything to you about whether the  
 13 Silver commander might on that night go to the scene?  
 14 A. No, sir.  
 15 Q. So were you just working on your assumption that because  
 16 the Silver commander at GMP generally is in the Silver  
 17 room that that's where they would locate themselves?  
 18 A. Yes.  
 19 Q. You indicate in your statement that shortly after  
 20 midnight you briefed Superintendent Hill. Did there  
 21 come a point shortly after you'd arrived where you spoke  
 22 to him?  
 23 A. Mr Hill?  
 24 Q. Mr Hill.  
 25 A. Yes, at that time in the statement.

204

1 Q. Why were you speaking to him?  
 2 A. He was the senior officer besides Ma'am Ford in the  
 3 room.  
 4 Q. Did you come to understand that he was to be the Silver  
 5 commander?  
 6 A. Yes, sir .  
 7 Q. Did anyone at any point explain to you why he had become  
 8 the Silver commander in replacement of Mr Nawaz?  
 9 A. No, sir .  
 10 SIR JOHN SAUNDERS: So apart from you briefing  
 11 Superintendent Nawaz, telling him what was going on,  
 12 telling him what you were doing, he told you he'd rung  
 13 Gold?  
 14 A. Yes.  
 15 SIR JOHN SAUNDERS: That's really all you had to do with him  
 16 that night?  
 17 A. Yes, sir .  
 18 SIR JOHN SAUNDERS: Thank you.  
 19 MR DE LA POER: In the event you weren't the first person to  
 20 arrive in Silver control; is that right?  
 21 A. I believe not, sir , I can't remember.  
 22 Q. I think your colleague James Bunney, if I've pronounced  
 23 that correctly , he was there before you. Might that be  
 24 right?  
 25 A. Possibly, yes, sir .

205

1 Q. Was there a lot for you to do in terms of setting up the  
 2 room when you did arrive?  
 3 A. I was just making sure the staff were in place, making  
 4 sure they were already looking through the incident  
 5 itself , making sure they are updated where the job was  
 6 updated to, making sure they were all okay.  
 7 SIR JOHN SAUNDERS: Had you brought the staff with you?  
 8 A. No sir, we had all travelled separately.  
 9 SIR JOHN SAUNDERS: But they came with you from --  
 10 A. From the control room.  
 11 SIR JOHN SAUNDERS: So there was no one in Silver who was  
 12 already at force headquarters?  
 13 A. I don't believe so, sir .  
 14 SIR JOHN SAUNDERS: Why?  
 15 A. I couldn't mention that, sorry.  
 16 SIR JOHN SAUNDERS: Okay.  
 17 MR DE LA POER: Had some of those people come on duty for  
 18 the purpose of coming into Silver?  
 19 A. One radio operator did come in from home for that  
 20 evening.  
 21 Q. But otherwise were the radio operators drawn from within  
 22 the OCR?  
 23 A. Yes, sir .  
 24 Q. Was that from the location that you were at?  
 25 A. Two locations, sir .

206

1 Q. You know, and you have given a detailed response, that  
 2 there's some criticism within the policing expert report  
 3 about the fact that you left the OCR to set up the  
 4 Silver room and I'd like to explore that briefly with  
 5 you now.  
 6 Do you agree that there are advantages and  
 7 disadvantages in terms of where you might be located?  
 8 A. Yes, sir .  
 9 Q. So if we look at advantages for you remaining in the  
 10 OCR, you had become aware of the incident at a very  
 11 early stage; is that right?  
 12 A. Yes, sir .  
 13 Q. You had developed situational awareness, such as you  
 14 were able to, as the incident unfolded?  
 15 A. Yes, sir .  
 16 Q. You had spoken to a number of key people who were  
 17 involved in the response?  
 18 A. Yes, sir .  
 19 Q. And you had had an opportunity to speak to the FDO  
 20 whenever he was free to make sure that you had as full  
 21 a picture of his plan as possible?  
 22 A. Yes, sir .  
 23 Q. So you had that as advantages, do you agree, over  
 24 anybody who might step into your shoes?  
 25 A. Yes, sir .

207

1 Q. In terms of advantages in the Silver room, that was  
 2 something that was well within your competence?  
 3 A. Yes.  
 4 Q. Was there anyone else that you were aware of on duty  
 5 that night who were competent to set that room up?  
 6 A. Possibly, yes.  
 7 Q. Who might those people have been?  
 8 A. Andrew Core and I think another supervisor, but  
 9 I couldn't really say.  
 10 Q. So is it a question of balancing those interests to  
 11 determine where you are best deployed?  
 12 A. Yes, sir .  
 13 Q. And whose decision was it for you to deploy to the  
 14 Silver room?  
 15 A. The force duty officer .  
 16 Q. Whose decision was it that you would deploy within the  
 17 golden hour?  
 18 A. Force duty officer .  
 19 Q. Again, drawing on your experiences that night and  
 20 bearing in mind that critical first hour and bearing in  
 21 mind that for the duration of the journey to and from,  
 22 which takes us from inside the golden hour to outside  
 23 the golden hour, you are not going to be able to  
 24 participate in the response, having thought about it, do  
 25 you think that was the right time for you to leave the

208

1 OCR?  
 2 A. I believe what I did on the night was the right actions  
 3 to do and the force duty officer asked me to go as he  
 4 stated, told me to, and I did as I was —  
 5 Q. I'm not for a moment suggesting you should have  
 6 disobeyed a direct order, please don't misunderstand me.  
 7 We're trying to establish here, bearing in mind someone  
 8 needs to set up the Silver room, as you have told us,  
 9 whether or not somebody who has been involved for a very  
 10 intense 45 minutes or so with the incident response  
 11 should stop doing that for a period of 15 or so minutes,  
 12 take up a different role somewhere else, and have  
 13 somebody who has not been involved in the incident step  
 14 into their shoes. We're trying to work out when might  
 15 be the right time for that, and really having had the  
 16 experience you have, I'm just seeking your insight on  
 17 that as to whether or not there might have been a better  
 18 time for you to leave or whether there might have been  
 19 a better person, balancing all of those advantages and  
 20 disadvantages, to go.  
 21 A. I think it still was the right decision for me to leave  
 22 to set up the Silver control.  
 23 SIR JOHN SAUNDERS: Can I just work out or ask you, from the  
 24 time that you start to pack up in your original room to  
 25 the time you've unpacked in the Silver control room,

209

1 what time are we talking about?  
 2 A. Literally within 20 minutes. It's just unplug  
 3 a headset, put it round your neck, and then walk out the  
 4 door.  
 5 MR DE LA POER: But for those 20 minutes, if you'll forgive  
 6 the use of the phrase, you are off the table in terms of  
 7 contributing to the emergency response?  
 8 A. Yes, sir.  
 9 Q. Again, just thinking about what the Silver control room  
 10 is going to actually do, we've seen that list which you  
 11 hadn't seen of those activities for the Silver room  
 12 manager. Is it essential for the Silver room to be  
 13 staffed by someone as experienced as you that early  
 14 in the incident?  
 15 A. I believe it is, sir.  
 16 Q. So is it your view that your skills and experience are  
 17 better deployed in that location than in the OCR during  
 18 the time period that we are concerned with?  
 19 A. Yes, sir.  
 20 Q. Two more brief topics and they will be brief. The first  
 21 one is possibly no more than one question given how much  
 22 time has been spent on it already.  
 23 At any point whilst you were in the OCR did you  
 24 receive any indication from Inspector Sexton that the  
 25 fact that he had declared Operation Plato should be

210

1 withheld from other emergency services?  
 2 A. No, sir.  
 3 Q. I said just one question. A couple of follow-ups.  
 4 Might you have, as part of your duties that night,  
 5 found yourself speaking to other emergency services?  
 6 A. Possibly, sir, but I was dealing with other incidents  
 7 and I knew that the Fire Service and Ambulance Service  
 8 were aware due to their log numbers on the log itself,  
 9 on GMP's log.  
 10 Q. Did any of your duties that night include speaking as  
 11 required to other emergency services?  
 12 A. Not at that time, sir.  
 13 Q. Had you found yourself speaking to emergency services,  
 14 is that the sort of information that you might have  
 15 passed on, or would it be entirely dependent on what the  
 16 purpose of the call was?  
 17 A. It depends on the purpose of the call.  
 18 SIR JOHN SAUNDERS: You didn't know what it meant, anyway.  
 19 A. No, sir.  
 20 SIR JOHN SAUNDERS: Have we finished the first question now?  
 21 MR DE LA POER: Yes, all five of them!  
 22 SIR JOHN SAUNDERS: Thank you.  
 23 MR DE LA POER: Final topic: you deal in your fourth witness  
 24 statement with Hailing channels.  
 25 A. Yes, sir.

211

1 Q. We'll just bring this up on screen because it will be  
 2 the most efficient way to deal with it. {INQ041227/1}.  
 3 The top one is labelled the police Hailing Talk  
 4 Group. Was it your understanding on the night that  
 5 there was a Hailing Talk Group that BTP could use to  
 6 contact the OCR at GMP?  
 7 A. Yes, sir.  
 8 Q. Had they done so, was that a channel or a Talk Group  
 9 that was being monitored?  
 10 A. It was, yes.  
 11 Q. So far as the multi-agency Hailing Talk Group is  
 12 concerned, was that something that you were familiar  
 13 with on the night of 22 May?  
 14 A. Yes.  
 15 Q. Had you used it?  
 16 A. Me personally, no, but my staff on Team 3 have used it.  
 17 Q. Would you know how to use it if you needed to?  
 18 A. Yes, sir.  
 19 Q. Would you expect them to know how to use it if they  
 20 needed to?  
 21 A. Yes.  
 22 Q. And if that was being monitored at the other end, so far  
 23 as the other agencies were concerned, would you expect  
 24 that to be capable of establishing three-way  
 25 communication?

212

1 A. The shared Hailing group is a Hailing group that's  
 2 automatically monitored by the Team 3 staff and it's  
 3 monitored 24/7, so other agencies can shout up to  
 4 contact GMP.  
 5 SIR JOHN SAUNDERS: And you literally mean shout up?  
 6 A. Yes, sir, transmit on their Airwaves radio.  
 7 MR DE LA POER: Does it work the other way, that if GMP  
 8 wanted to shout up to them you could use that?  
 9 A. We have to then contact them on their shared Hailing  
 10 group or their Hailing group.  
 11 Q. So it's not one group for everybody, each has their own  
 12 shared?  
 13 A. Yes, sir.  
 14 Q. Was there on the night of 22 May one group or channel  
 15 for everybody that was available? I'm not talking about  
 16 whether it was used.  
 17 A. Yes, sir.  
 18 Q. There was?  
 19 A. Yes.  
 20 Q. And again, was that something that you had any  
 21 familiarity with?  
 22 A. Limited, sir.  
 23 Q. If you'd been asked to use it, do you believe that you  
 24 would have been competent to do so?  
 25 A. Yes, sir.

213

1 SIR JOHN SAUNDERS: It doesn't sound as if it was used very  
 2 often.  
 3 A. No, sir, it wasn't.  
 4 MR DE LA POER: The next entry there, is that what we've  
 5 been talking about or is that something different?  
 6 A. No, that's what we've been talking about.  
 7 Q. And the tactical multi-agency Talk Group, is this  
 8 another way in which, at a Silver level, emergency  
 9 services can speak to each other?  
 10 A. Yes, sir.  
 11 Q. Was that a Talk Group you had any familiarity with?  
 12 A. Not on the night, sir, no.  
 13 Q. So in Silver control, had you received an instruction,  
 14 "I want you from Silver control to contact the tactical  
 15 commanders of the other agencies", would you have known  
 16 how to do it?  
 17 A. Yes, sir.  
 18 Q. Or had someone on hand to --  
 19 A. Sorry, yes.  
 20 SIR JOHN SAUNDERS: Just in case any of us, or me in  
 21 particular, get confused, is this what we were talking  
 22 about with Mr Sexton as being something which could have  
 23 been set up but he thought it was better to wait until  
 24 Silver control started?  
 25 MR DE LA POER: That's my understanding, but I'm sure I'll

214

1 be told if that's wrong. I'm not receiving any nods or  
 2 shakes at this point --  
 3 MR HORWELL: The channel third down on the list,  
 4 "Operational multi-agency Talk Groups 1, 2 and 3", that  
 5 is the channel that is referred to on Mr Sexton's  
 6 aide-memoire. When you look at the document, sir, it's  
 7 blanked out, unfortunately, but it's the document --  
 8 it's the channel that is referred to in the  
 9 aide-memoire. So we are working on the basis that  
 10 that is the channel he meant.  
 11 SIR JOHN SAUNDERS: Okay, thank you.  
 12 MR DE LA POER: That accords with my understanding.  
 13 Thank you very much indeed, Mr Horwell.  
 14 Earlier in my questioning when you asked you about  
 15 JESIP, you indicated that you regarded there as having  
 16 been a communication difficulty on the night. Can you  
 17 just tell us what your understanding of that was so far  
 18 as your experience was concerned?  
 19 A. The police Hailing group and the shared Hailing group  
 20 were monitored 24/7 in the control room by the Team 3  
 21 radio staff, which could have been used by the police --  
 22 other police forces like BTP, and the shared Hailing  
 23 group, the Fire Service or Ambulance Service could have  
 24 shouted up on that to contact GMP.  
 25 The other ones, the third one down, I am aware of

215

1 them being available, but they wasn't used on the  
 2 evening.  
 3 Q. Were you ever given an instruction that either you or  
 4 one of your radio operators, whether in the OCR or  
 5 in the Silver room, should contact any other agency?  
 6 A. When we got to the Silver control room, I was asked by  
 7 Laura Lewis if we can contact the other agencies on the  
 8 fourth one down, the tactical multi-agency Talk Group.  
 9 Q. Was that the first request you'd received?  
 10 A. It was.  
 11 Q. About what time was that?  
 12 A. I think it was about 11.50, 11.55, something like that.  
 13 Q. Looking back now, bearing in mind your role as force  
 14 duty supervisor, is that quite a surprisingly late point  
 15 in the evening for that request first to be made?  
 16 A. Yes, sir.  
 17 MR DE LA POER: I have no further questions for Mr Randall.  
 18 I'm conscious of the time. I don't know whether  
 19 you have any questions for him.  
 20 SIR JOHN SAUNDERS: No, I don't at the moment. Thank you.  
 21 Mr Horwell, while I'm thinking of it, it may be  
 22 there's going to be complete agreement between all of  
 23 the emergency services as to what communications were or  
 24 were not available on the night. I'm obviously keen  
 25 because it seems to be something which is capable of

216

1 agreement for there to be agreement and for me to have  
 2 an agreed statement or document of some sort, if that is  
 3 at all possible.  
 4 MR HORWELL: Sir, yes. You're inviting us to contact the  
 5 other emergency services to see if we can come to --  
 6 SIR JOHN SAUNDERS: Not on the emergency line, but yes, just  
 7 generally, if you wouldn't mind.  
 8 MR HORWELL: Of course we will. We've set out our stall and  
 9 we'll contact them.  
 10 SIR JOHN SAUNDERS: If there's disagreement, obviously  
 11 we will hear evidence to decide and I will decide which  
 12 I prefer, but obviously the less disagreement -- so  
 13 I know before I start where there is disagreement, if  
 14 any, it would be a great help to me.  
 15 MR HORWELL: We will do that, sir.  
 16 SIR JOHN SAUNDERS: Thank you very much.  
 17 Unless anyone is really keen to continue, I will  
 18 finish now. I'm sorry to get you to come back. It's  
 19 9.30 on Monday. We are slightly behind, but hopefully  
 20 we won't get too far behind.  
 21 MR DE LA POER: Only very modestly, in fact.  
 22 SIR JOHN SAUNDERS: Only modestly behind?  
 23 MR DE LA POER: Very modestly.  
 24 SIR JOHN SAUNDERS: As long as everyone understands, we are  
 25 behind. As I said before, it takes as long as it takes,

217

1 but time is not infinite -- well, it might be, but not  
 2 for me.  
 3 Thank you very much.  
 4 (4.15 pm)  
 5 (The inquiry adjourned until 9.30 am  
 6 on Monday, 10 May 2021)  
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 16  
 17  
 18  
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 20  
 21  
 22  
 23  
 24  
 25

218

I N D E X

3 CHIEF INSPECTOR DALE SEXTON .....1  
 4 (continued)  
 5 Questions from MR WEATHERBY (continued) .....1  
 6 Questions from MR ATKINSON .....47  
 7 Questions from MR COOPER .....72  
 8 Further questions from MR GREANEY .....116  
 9 Questions from MR DAVIES .....132  
 10  
 11 PSS IAN RANDALL (sworn) .....164  
 12 Questions from MR DE LA POER .....164  
 13  
 14  
 15  
 16  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

219

220



**A**

ability (6) 55:3 83:5 131:1  
159:1 160:1 164:7

able (17) 2:19 13:3 17:24  
37:20 78:24 108:2 129:15  
130:9 150:12 152:6 159:1  
167:5 169:24 192:4 203:11  
207:14 208:23

ably (2) 84:5 89:15

above (1) 126:21

absence (1) 151:10

absolute (2) 96:24 113:4

absolutely (39) 4:25 8:16  
10:22 13:19 17:2 21:23  
27:9 30:13,14 31:23  
33:10,24 39:8 42:9 47:17  
50:15 51:22 56:1,11,22  
60:24 80:7 84:7 88:25  
93:22 104:18 105:7 112:2  
113:17 114:12 118:2  
122:22 124:8 152:23  
161:16,24 179:22 195:16  
196:1

absorb (1) 152:17

absorbed (1) 152:2,3

absorbing (1) 152:21

abstract (1) 110:19

acc (1) 60:5

accept (6) 5:11 50:21 88:22  
93:14 100:3 134:22

acceptable (3) 16:17 18:24  
58:25

acceptance (1) 36:17

accepted (5) 35:14 48:21  
99:5,6,9

accepting (1) 113:13

access (3) 79:6 83:8 175:22

accolade (1) 73:3

accord (4) 23:5 24:12  
110:15,16

accordance (1) 175:3

according (2) 12:16 160:17

accounts (1) 215:12

account (16) 1:16 4:17 5:5  
10:4 34:7 38:1 40:9 45:6  
69:5 111:19 118:24 119:5  
124:2 125:16 131:8 194:15

accuracy (1) 133:11

accurate (4) 123:19,20  
132:16 134:8

accurately (1) 121:14

achieve (1) 40:3

achieved (2) 40:23 112:6

acronym (2) 80:19 169:6

across (4) 13:24 51:12 116:6  
180:19

acted (3) 28:7 167:23 185:22

action (11) 15:15 16:7 17:7  
20:12 32:10,16 33:6 79:4  
86:24 189:25 190:6

actions (8) 72:8,15 73:11  
99:7 181:3,4 184:23 209:2

activate (1) 61:17

activated (1) 59:20

activation (3) 56:24 58:6  
59:7

active (6) 15:21 71:15  
100:13,14 101:7 143:3

activities (3) 179:5,18  
210:11

activity (1) 142:17

actual (5) 56:7 76:2 95:23  
102:24 150:13

actually (49) 5:17 11:5 12:21  
15:5 16:11 17:23 19:2  
20:15 23:22,24 25:5,7  
28:25 37:16 38:10,16,19  
41:22,25 58:14 67:15,18  
69:15 71:17 88:19 97:2,4  
106:22 111:4 114:10,20,22  
117:8 124:17,18 133:16,22  
140:20 148:5 150:19 151:2  
155:9 157:3 158:21 159:12  
161:14 180:1 186:6 210:10

adamant (1) 42:9

adams (1) 147:1

add (3) 20:5 87:13 93:12

added (1) 159:18

additional (4) 78:19 79:23  
177:9 183:5

address (3) 32:8 33:19  
155:10

addressed (3) 34:1 150:10  
159:6

addressing (1) 32:9

adequate (1) 196:2

adequately (3) 113:25  
168:24 197:15

adjoined (1) 218:5

adjournment (1) 163:24

administer (1) 50:3

administration (2) 80:14  
176:21

advantages (7) 76:18 77:5  
207:6,9,23 208:1 209:19

advice (3) 17:19 136:8 177:5

adviser (3) 135:20,23 136:3

affect (2) 45:25 99:19

affected (4) 18:8 142:22  
155:16,18

affecting (1) 106:7

afro (1) 147:1

afos (1) 147:9

afraid (1) 137:18

after (32) 3:9 4:8,22 11:23  
30:21 33:13 38:9 40:24  
48:24 72:13,20 89:21,25  
91:25 95:12 96:11 106:22  
112:15 117:19 119:1 125:4  
127:6 136:10 141:3,19  
156:9,18 187:20 197:19  
203:6 204:19,21

afternoon (4) 5:21 162:11  
164:2 171:21

afterthought (1) 4:22

afterwards (1) 126:7

again (79) 9:24 10:8 11:7,20  
13:5 14:11 15:21 20:8  
22:21 25:20,23 28:12,16  
29:10,22,25 32:7 41:10  
47:1 54:2,23 59:19 60:8  
63:6 65:9 66:25 70:6 73:2  
77:25 78:7,23 79:19,22  
80:3,18,25 83:15 86:8  
89:14 94:25 95:15 97:10  
99:3 100:11 103:6 107:18  
108:1,5 111:3,10,23  
112:11,25 113:3,5,15,16  
120:2,5 121:23 126:12  
131:10 134:12 147:3  
151:21 152:6 153:7 156:15  
158:16 163:14 174:6  
175:13 187:15 190:17  
193:12 203:19 208:19  
210:9 213:20

against (2) 125:6,6

agencies (13) 23:6 51:20  
57:7 74:23 132:20 150:7  
177:2,4 185:14 212:23  
213:3 214:15 216:7

agency (1) 216:5

ago (4) 94:12 99:13 111:22  
112:4

agree (34) 6:9 32:16 43:7  
47:14 48:9 49:1,9 51:19,25  
53:14 55:15 58:4 64:23  
67:23 68:13 79:5 80:7 81:3  
121:5,25 128:23 129:15  
130:12 140:13 141:1  
142:14 145:16,18 157:18  
163:7,20 202:9 207:6,23

agreed (11) 28:3 43:17 50:8  
52:7 57:11 63:10 64:13  
66:14,15 67:15 217:2

agreeing (4) 28:7 43:15  
66:18 67:7

agreement (5) 35:10 43:18  
216:22 217:1,1

ahead (2) 183:24 199:13

aid (1) 50:3

aide-memoire (13) 3:9 19:14

28:18 29:2 32:10 39:23  
52:5 111:4,5 180:15,16  
215:6,9

aimed (1) 63:7

air (2) 152:11 194:16

airport (2) 21:16,20

airwave (3) 116:5 159:18  
197:23

airwaves (7) 56:24 57:4  
159:17,20 160:4,9 213:6

alarm (2) 10:24 12:5

alarms (1) 9:17

albeit (2) 17:4 120:3

alert (2) 7:23 103:16

alerted (1) 19:21

allocation (1) 84:20

allow (4) 31:4 46:5 62:3  
113:15

allows (3) 15:3 16:12 115:22

almost (7) 4:22 40:18,22  
66:25 67:1 88:2 154:21

along (4) 31:23 78:9 79:19  
80:23

alongside (1) 71:21

already (39) 11:9 13:20,21  
15:18 18:15 20:21 27:19  
28:3 31:12 38:10 43:15  
53:18 56:15 57:10 63:10  
83:21 89:15 92:21 95:17  
100:12 102:1 125:1 126:23  
134:6 145:20 153:3 161:18  
170:6 184:13 196:7 197:4  
199:9,11,11,14 200:2  
206:4,12 210:22

also (33) 3:8 6:16 8:10,17  
9:5 10:13 13:4  
19:19,20,21,24 28:10 53:8  
54:19 71:3 78:11 80:16  
83:12 94:15 109:20,22  
115:22 117:14 118:10  
127:18 147:8 163:11  
166:11 177:7 181:1 184:18  
201:7,10

alter (2) 125:16 131:7

alternatives (4) 96:22 97:8,9  
122:21

although (16) 31:16 45:10  
60:7 63:7 67:5 76:1 81:20  
100:1,8 116:11 128:12  
132:14 134:5 160:16 176:1  
197:14

always (19) 9:11 22:23  
23:12,23 31:15 39:5,14  
44:18 70:8 83:1 104:13  
114:13,15 124:24 161:16  
183:1 185:1 196:21 201:13  
215:23

ambiguity (1) 187:13

ambulance (17) 8:14 22:3,10  
25:10 41:24 42:6 63:21,24  
64:12 68:2 94:5 120:12,24  
124:13 133:17 211:7  
215:23

ambush (1) 61:3

amount (3) 96:16 114:4  
123:8

analysis (1) 39:21

and/or (2) 137:12 138:9

andrew (5) 84:4 200:25  
201:6,7 208:8

another (19) 3:8 13:6 33:4  
34:21 35:23 36:22 59:22  
62:1 67:11 109:15 114:25  
120:1 121:8 137:15 142:3  
173:2 188:18 208:8 214:8

answer (20) 30:1 33:13 34:13  
77:25 82:5 95:16 108:15  
109:25 111:4 127:13,16  
130:14 144:24 151:24  
157:12 158:21 159:10  
167:5 171:10 175:10

answering (1) 131:10

answers (3) 125:15 131:6  
132:15

anticipate (1) 100:24

anticipating (1) 178:12

anxious (1) 1:17

anybody (7) 45:7 133:21  
157:1 170:24 202:22  
204:12 207:24

anyone (20) 3:15 25:13  
26:14 36:2 50:2 59:15 65:7  
82:7 107:9 111:5  
118:13,14 157:2 162:6  
168:15 190:9 195:20 205:7  
208:4 217:17

anything (20) 12:4 14:5 79:3  
81:17,25 82:6,7 83:5 85:23  
113:10 123:18,24 131:6  
158:19 169:11 177:21,24  
185:15 187:10 204:12

anythings (1) 73:20

anyway (6) 30:16 36:5 60:5  
107:22 124:15 211:18

anywhere (1) 115:18

apart (1) 205:10

app (4) 15:2 16:12 28:9,14

appalling (2) 18:6 161:23

apparent (3) 119:10 143:22  
155:4

appear (3) 27:9 52:16 138:14

appeared (2) 16:1 117:20

appears (3) 44:3 66:18  
203:10

applied (2) 25:5 132:19

applies (1) 51:9

apply (6) 47:13,18 51:17  
56:20 63:9 179:17

applying (2) 40:4 156:10

appraised (1) 105:16

appraise (6) 53:25 96:25  
118:2 132:23 163:18  
181:12

approach (6) 15:17 43:10  
105:12 119:6 148:5 177:5

appropriate (3) 15:16 86:18  
159:19

approximate (1) 203:22

approximately (2) 2:15  
167:17

area (24) 8:6 25:24 30:4  
60:19 61:2 74:21 76:22  
77:7 78:16 79:21 82:8 83:7  
84:18 93:11 115:20 144:19  
150:12 159:16,25 169:11  
170:22,24 175:24 190:8

areas (11) 21:18 39:3 57:18  
83:7 114:5,5 132:11 138:5  
139:13 150:2 158:15  
139:15,20 188:8 190:4,15  
193:18

arent (5) 7:25 70:20 74:6  
140:1 145:4

arguably (1) 139:10

argue (1) 114:16

arguments (2) 66:23 160:4

ariana (6) 104:7  
105:10,13,20 139:15  
195:22

arisen (4) 24:11 132:12  
143:18 147:21

arises (1) 142:2

armed (13) 6:16 10:11 14:18  
16:24 17:8 19:17 25:6  
26:12,12 28:9,14 31:1 40:6

arose (2) 22:12 59:9

around (16) 2:23 10:3 12:15  
60:20 62:8 77:10 95:2,3  
110:20 130:21 136:7  
138:24 140:19 146:20  
149:25 183:4

arranged (1) 185:4

arrangement (1) 85:18

arrangements (1) 198:3

arranging (2) 188:20 200:17

arrests (1) 135:16

arrival (2) 12:3 203:22

arrive (2) 205:20 206:2

arrived (4) 197:14 204:4,6,21

arrives (1) 153:12

arriving (2) 17:14 185:13

article (3) 28:13 70:8 118:22

articulated (1) 92:9

arv (2) 21:21,21

arvs (9) 7:14,17,19 9:3 10:5  
12:2,25 14:15 15:5

ascertain (1) 24:5

ashworth (1) 128:14

aside (1) 177:14

ask (38) 6:2,5 13:3 15:25  
29:12 34:14 42:11 47:5  
52:10,15 57:1 60:11,13  
63:13 72:4 73:9 74:19 75:6  
76:13,14,15 83:23  
104:5,18 106:8 107:14  
110:9 116:12,16 119:3  
120:3 129:10 130:17  
132:10 151:15 168:23  
194:2 209:23

asked (32) 13:10,15 24:17  
42:23,24 59:11 60:14  
63:12 70:13,14 74:17  
83:22 85:9 86:6 103:24,25  
104:3 110:10 113:19  
152:15 157:11 158:10  
167:4 180:6,8 195:17  
199:8,18 209:3 213:23  
215:14 216:6

asking (8) 5:20 34:11 75:24  
79:12 99:20 104:21,25  
199:22

askin (4) 116:13,19 195:19  
203:12

aspect (16) 69:25 74:1,4,5  
88:8 100:12 102:24 104:1  
106:10 123:25 125:16  
130:7 131:8 156:1,14  
157:7

aspects (10) 57:16 63:8,22  
88:17 116:11 120:17  
123:17 141:21 158:12  
163:18

aspires (1) 89:8

assert (3) 24:15 33:17 54:21

asserting (1) 38:4

assertion (1) 65:9

assess (4) 66:17 68:8,23 83:5

assessed (1) 70:2

assessing (3) 7:9 62:16 70:23

assessment (10) 11:21 31:9  
63:6 68:2 70:10 134:4  
148:25 150:12 155:16  
157:16

assets (6) 6:17,17,18 16:24  
31:1 149:1

assist (11) 23:15 72:7 83:16  
94:11 101:10 109:22  
143:16 159:18 169:21  
177:12 179:25

assistance (9) 46:16,18,24  
47:1 108:20 109:16 127:18  
130:1 177:5

assistant (1) 109:15

assistants (1) 50:19

assisted (7) 83:12 84:5 93:21  
142:25 179:7,8,9

assisting (1) 83:24

assumed (2) 31:1 105:19

assumption (3) 61:24 154:13  
204:15

assure (2) 162:10 163:1

atkinson (14) 47:5,8,9 55:20  
60:11,14 62:25 63:1  
67:8,24 71:25 72:1 162:14  
219:6

atrocities (1) 88:6

atrocious (3) 88:3 132:22  
161:23

attack (36) 6:22 11:18,18,24  
18:5 24:16 48:2,3,11  
60:16,22 61:16 63:20  
88:15 89:3,4,11 90:6  
100:18 101:8,25  
102:4,15,19,22  
103:12,12,13,16 106:22

138:14 139:11 140:17  
141:18 142:13 155:24

attacker (1) 6:11

attacks (5) 60:25 62:1 88:22  
138:3 141:22

attempted (1) 96:14

attempting (1) 50:24

attempts (1) 123:21

attend (7)  
23:9,11,13,13,19,20 145:3

attended (2) 9:7 23:24

attendees (1) 23:10

attenders (1) 43:25

attending (2) 13:14 191:5

attention (2) 119:3 125:9

attitude (1) 105:18

attributed (2) 128:11,13

attributes (1) 98:9

audio (9) 128:21 130:21  
134:14 151:15 152:5  
188:23 189:2 198:23 202:4

audit (1) 4:7

austerity (6) 104:23  
105:3,6,17 106:5,7

author (1) 172:8

authorised (3) 15:19 16:14  
17:3

authority (4) 10:6 156:16  
169:23 170:1

automatic (1) 60:16

automatically (7) 24:22  
60:21 61:5,13,21 156:15  
213:2

avail (1) 49:20

available (11) 4:23 68:5  
75:19 135:25 154:20  
159:21 161:6 175:23  
213:15 216:1,24

avoid (4) 65:11,12 90:14  
113:3

award (1) 74:9

awarded (1) 72:22

aware (53) 2:16 11:23 14:20  
18:20 20:25 22:1 23:2  
24:13 27:21 28:1 34:2  
40:15 50:8 53:19 61:1  
67:23 92:9 93:17 98:3  
104:19 105:12 107:4  
120:19 129:3,9 147:8,16  
150:24 151:3 152:13  
155:5,7,7,9,14 161:11  
162:3 168:14 169:14  
171:14 175:8 184:11  
185:14 186:2 188:8 189:21  
195:12 196:8 199:11  
207:10 208:4 211:8 215:25

awareness (14) 13:3 17:15  
19:21 21:12,14 22:25  
35:4,24 36:5 39:4 150:13  
151:10,12 207:13

away (10) 17:24 40:22 59:25  
77:6 109:17 122:25 125:10  
152:24 161:17 174:21

**B**

b (2) 5:19 142:23

back (32) 5:15 9:8 10:11  
17:20 36:8 63:1 67:24  
69:10 72:6 73:7 95:15  
100:9 104:6 111:10 135:9  
136:8 137:9 139:6,7  
140:14 141:15 153:14  
160:6 162:18 164:8  
180:4,24 192:1 195:13  
196:25 216:13 217:18

background (1) 203:2

backing (1) 72:10

bad (3) 186:10 187:15 192:7

balancing (2) 208:10 209:19

ball (3) 14:10 37:17 96:20

ballistic (1) 149:13

balloons (1) 9:10

bank (1) 84:15

banks (1) 183:2

barrister (1) 19:5

based (11) 25:5 76:16,20  
78:6 80:16 98:14 104:17  
151:9 181:23 184:12  
197:25

baseline (1) 184:24

basic (2) 73:21 135:11

basically (1) 15:1

basis (4) 11:17 81:21 140:3  
215:9

bat (1) 129:25

bataclan (2) 87:4,8

bear (2) 171:25 180:25

bearing (11) 13:14 24:8  
34:21 53:19 96:16 106:20  
145:6 208:20,20 209:7  
216:13

bearings (1) 63:2

became (8) 20:25 41:11  
53:14,15 114:3 155:7  
163:17 188:7

become (5) 40:3 106:1  
189:21 205:7 207:10

becomes (1) 53:8

becoming (1) 54:12

before (50) 2:10 4:21 20:4  
23:3 30:6 34:1 40:3,10  
41:17 49:20 62:13 70:5  
80:6 82:1 83:5,22 90:2  
95:20,24 98:17 110:4,11  
116:13,20 121:10 128:9  
136:15 139:4 141:10  
145:11 151:17 162:13  
164:6 167:19,20,21 178:24  
181:5 185:22 186:25  
187:11 188:3 191:3 192:20  
195:23 196:22 201:24  
205:23 217:13,25

beforehand (1) 33:7

began (1) 193:16

begin (2) 101:24 192:25

beginning (2) 88:5 119:17

behalf (2) 73:10 99:21

behind (7) 18:2 141:12  
142:12 217:19,20,22,25

being (55) 3:25 4:17 5:3  
7:3,20 8:24 13:3 14:24  
17:24 23:18 24:25  
30:7,11,17 37:6 38:1  
42:23,24 59:11 60:14  
61:16 70:1 72:18 76:20  
83:4,9,17 96:17 98:9  
101:24 103:15 108:13  
114:10 120:19 124:11  
125:11 130:9,16 131:22  
138:23 146:9 147:21  
152:11 159:7 160:3 161:5  
168:24 169:24 173:22  
178:12 191:21 196:11  
212:9,22 214:22 216:1  
217:14

belief (4) 25:21 94:8 122:9  
143:1

believe (38) 10:17 12:21  
18:12 24:25 26:16 28:10  
42:13 44:21 45:12,13  
54:23,24 66:8 70:8 110:24  
116:25 119:21 123:

130:12 131:12 157:13,17 208:11	<b>c</b> (1) 5:19	<b>chairs</b> (1) 104:1	42:17 60:21 70:24 77:16 81:13 88:17 96:10 114:23 115:18 116:2 127:13 133:5 143:16 164:8 169:10,10 172:16 183:1 185:18 186:9 190:24 192:1 199:3 204:21 205:4 206:17,19 217:5,18 <b>comfortable</b> (2) 151:21 185:10	<b>completely</b> (2) 87:16 163:13 <b>complex</b> (3) 78:3 80:13,17 <b>complexities</b> (1) 87:8 <b>complicated</b> (1) 87:22 <b>component</b> (1) 141:10 <b>comprised</b> (1) 80:14 <b>compromise</b> (1) 33:22 <b>computers</b> (2) 184:25 185:1 <b>conceal</b> (5) 1:13 2:2 27:23 117:15 118:12 <b>concealed</b> (1) 40:12 <b>concealing</b> (1) 122:15 <b>concentrate</b> (2) 31:4 141:23 <b>concentrating</b> (1) 130:24 <b>concentration</b> (1) 96:20 <b>concept</b> (2) 179:13,14 <b>concern</b> (5) 12:11 71:14 95:20 114:10 135:4 <b>concerned</b> (25) 30:3 37:21 41:12 44:3 63:25 72:9 73:3,6 74:7,9 85:8 86:10 91:7 95:19 104:8 119:9 140:13 171:1 194:9 199:15 201:22 210:18 212:12,23 215:18 <b>concerns</b> (4) 100:11 110:17,18,20 <b>concert</b> (5) 104:8 105:10,14 139:15 195:22 <b>concerts</b> (2) 105:13,19 <b>concession</b> (1) 97:16 <b>conclude</b> (2) 148:23 164:2 <b>concludes</b> (1) 124:16 <b>concurrent</b> (2) 33:21 154:8 <b>condense</b> (1) 157:10 <b>conducted</b> (1) 183:18 <b>conference</b> (2) 168:6 183:17 <b>confidence</b> (3) 11:4 45:13 189:10 <b>confident</b> (3) 16:2 26:22 27:6 <b>confirm</b> (3) 28:5 192:4 193:15 <b>confirmation</b> (1) 20:19 <b>confirmed</b> (2) 21:4 71:17 <b>conflicted</b> (1) 123:24 <b>conflicting</b> (4) 11:8,11 31:14 53:1 <b>confused</b> (2) 114:3 214:21 <b>confusion</b> (1) 41:24 <b>connected</b> (1) 117:24 <b>connection</b> (2) 61:25 77:12 <b>conscious</b> (5) 101:9 103:11,24 105:4 216:18 <b>consequence</b> (2) 16:21 90:13 <b>conservative</b> (1) 168:6 <b>consider</b> (15) 11:22 27:3,4 44:12 56:24 58:6 59:7 69:7 75:15 104:8 116:12 130:4 163:19 171:21 184:18 <b>consideration</b> (15) 18:16,22 22:15,16 31:10 53:18,20 68:5 99:4 117:2,12 143:19 146:11,13,15 <b>considerations</b> (1) 141:4 <b>considered</b> (6) 2:6 20:21 26:9 98:9 105:14 139:22 <b>considering</b> (2) 1:11 38:19 <b>consistently</b> (1) 118:25 <b>constable</b> (1) 172:10 <b>constant</b> (2) 85:1 87:22 <b>constantly</b> (3) 16:8 22:19,20 <b>constraints</b> (1) 15:24 <b>constructing</b> (1) 111:15 <b>consult</b> (1) 118:11 <b>consultation</b> (3) 156:9,13,24 <b>consultations</b> (1) 111:14 <b>contact</b> (37) 8:4,5 13:1 16:8 17:12 29:4 37:12 41:12 50:14,15 54:4 57:7,21,22 64:6 96:14,14 120:24 123:21 129:24 134:6,16 143:24 189:25 194:16 195:9 197:5,20 212:6 213:4,9 214:14 215:24 216:5,7 217:4,9	<b>contactable</b> (1) 175:24 <b>contacted</b> (5) 28:19 35:8 198:18 199:9 200:3 <b>contacting</b> (3) 54:3 57:1 58:9 <b>contacts</b> (2) 134:2 199:9 <b>contain</b> (1) 15:16 <b>contained</b> (1) 190:25 <b>contains</b> (1) 200:22 <b>contemporaneous</b> (3) 2:22 3:13 5:5 <b>content</b> (2) 162:15 171:25 <b>contents</b> (1) 171:12 <b>context</b> (8) 22:25 55:16 91:1,6 119:16 135:24 156:21 173:23 <b>continue</b> (2) 190:22 217:17 <b>continued</b> (4) 1:3,4 219:4,5 <b>continuing</b> (1) 155:17 <b>continuously</b> (1) 66:17 <b>contrary</b> (6) 19:2 27:16 28:7 40:12 99:25,25 <b>contrast</b> (2) 107:5 135:23 <b>contrasting</b> (2) 76:23,25 <b>contribute</b> (1) 19:20 <b>contributing</b> (1) 210:7 <b>contribution</b> (1) 128:13 <b>control</b> (102) 9:19 11:14 13:12,13 35:1 46:14 55:3,24 57:1 58:22,23 64:11 74:18,20,23 75:8,19,20 76:1,3,19 77:23 78:4,6 79:11,15,16,18,18 80:3,8 81:10,14,18 82:12,15,19,24,25 83:12 <b>conducted</b> (1) 183:18 <b>conference</b> (2) 168:6 183:17 <b>confidence</b> (3) 11:4 45:13 189:10 <b>confident</b> (3) 16:2 26:22 27:6 <b>confirm</b> (3) 28:5 192:4 193:15 <b>confirmation</b> (1) 20:19 <b>confirmed</b> (2) 21:4 71:17 <b>conflicted</b> (1) 123:24 <b>conflicting</b> (4) 11:8,11 31:14 53:1 <b>confused</b> (2) 114:3 214:21 <b>confusion</b> (1) 41:24 <b>connected</b> (1) 117:24 <b>connection</b> (2) 61:25 77:12 <b>conscious</b> (5) 101:9 103:11,24 105:4 216:18 <b>consequence</b> (2) 16:21 90:13 <b>conservative</b> (1) 168:6 <b>consider</b> (15) 11:22 27:3,4 44:12 56:24 58:6 59:7 69:7 75:15 104:8 116:12 130:4 163:19 171:21 184:18 <b>consideration</b> (15) 18:16,22 22:15,16 31:10 53:18,20 68:5 99:4 117:2,12 143:19 146:11,13,15 <b>considerations</b> (1) 141:4 <b>considered</b> (6) 2:6 20:21 26:9 98:9 105:14 139:22 <b>considering</b> (2) 1:11 38:19 <b>consistently</b> (1) 118:25 <b>constable</b> (1) 172:10 <b>constant</b> (2) 85:1 87:22 <b>constantly</b> (3) 16:8 22:19,20 <b>constraints</b> (1) 15:24 <b>constructing</b> (1) 111:15 <b>consult</b> (1) 118:11 <b>consultation</b> (3) 156:9,13,24 <b>consultations</b> (1) 111:14 <b>contact</b> (37) 8:4,5 13:1 16:8 17:12 29:4 37:12 41:12 50:14,15 54:4 57:7,21,22 64:6 96:14,14 120:24 123:21 129:24 134:6,16 143:24 189:25 194:16 195:9 197:5,20 212:6 213:4,9 214:14 215:24 216:5,7 217:4,9	<b>contacted</b> (5) 28:19 35:8 198:18 199:9 200:3 <b>contacting</b> (3) 54:3 57:1 58:9 <b>contacts</b> (2) 134:2 199:9 <b>contain</b> (1) 15:16 <b>contained</b> (1) 190:25 <b>contains</b> (1) 200:22 <b>contemporaneous</b> (3) 2:22 3:13 5:5 <b>content</b> (2) 162:15 171:25 <b>contents</b> (1) 171:12 <b>context</b> (8) 22:25 55:16 91:1,6 119:16 135:24 156:21 173:23 <b>continue</b> (2) 190:22 217:17 <b>continued</b> (4) 1:3,4 219:4,5 <b>continuing</b> (1) 155:17 <b>continuously</b> (1) 66:17 <b>contrary</b> (6) 19:2 27:16 28:7 40:12 99:25,25 <b>contrast</b> (2) 107:5 135:23 <b>contrasting</b> (2) 76:23,25 <b>contribute</b> (1) 19:20 <b>contributing</b> (1) 210:7 <b>contribution</b> (1) 128:13 <b>control</b> (102) 9:19 11:14 13:12,13 35:1 46:14 55:3,24 57:1 58:22,23 64:11 74:18,20,23 75:8,19,20 76:1,3,19 77:23 78:4,6 79:11,15,16,18,18 80:3,8 81:10,14,18 82:12,15,19,24,25 83:12 <b>conducted</b> (1) 183:18 <b>conference</b> (2) 168:6 183:17 <b>confidence</b> (3) 11:4 45:13 189:10 <b>confident</b> (3) 16:2 26:22 27:6 <b>confirm</b> (3) 28:5 192:4 193:15 <b>confirmation</b> (1) 20:19 <b>confirmed</b> (2) 21:4 71:17 <b>conflicted</b> (1) 123:24 <b>conflicting</b> (4) 11:8,11 31:14 53:1 <b>confused</b> (2) 114:3 214:21 <b>confusion</b> (1) 41:24 <b>connected</b> (1) 117:24 <b>connection</b> (2) 61:25 77:12 <b>conscious</b> (5) 101:9 103:11,24 105:4 216:18 <b>consequence</b> (2) 16:21 90:13 <b>conservative</b> (1) 168:6 <b>consider</b> (15) 11:22 27:3,4 44:12 56:24 58:6 59:7 69:7 75:15 104:8 116:12 130:4 163:19 171:21 184:18 <b>consideration</b> (15) 18:16,22 22:15,16 31:10 53:18,20 68:5 99:4 117:2,12 143:19 146:11,13,15 <b>considerations</b> (1) 141:4 <b>considered</b> (6) 2:6 20:21 26:9 98:9 105:14 139:22 <b>considering</b> (2) 1:11 38:19 <b>consistently</b> (1) 118:25 <b>constable</b> (1) 172:10 <b>constant</b> (2) 85:1 87:22 <b>constantly</b> (3) 16:8 22:19,20 <b>constraints</b> (1) 15:24 <b>constructing</b> (1) 111:15 <b>consult</b> (1) 118:11 <b>consultation</b> (3) 156:9,13,24 <b>consultations</b> (1) 111:14 <b>contact</b> (37) 8:4,5 13:1 16:8 17:12 29:4 37:12 41:12 50:14,15 54:4 57:7,21,22 64:6 96:14,14 120:24 123:21 129:24 134:6,16 143:24 189:25 194:16 195:9 197:5,20 212:6 213:4,9 214:14 215:24 216:5,7 217:4,9	69:4 74:11 102:3 104:10 122:6,18 123:5 127:22 168:7 170:10 171:18 176:14 179:3 186:20,21 187:22 188:9 196:13 204:5 <b>corrected</b> (3) 21:25 48:23 133:13 <b>correctly</b> (3) 86:12 173:19 205:23 <b>couldnt</b> (22) 5:10 9:24 11:22 12:4 13:8 36:1,2,2 53:21 58:19 66:1,7 68:20 123:21 141:19 151:5 168:17 184:12 192:17 193:9 206:15 208:9 <b>counsel</b> (2) 41:21 74:18 <b>count</b> (2) 41:20 103:8 <b>counter</b> (2) 152:8 195:3 <b>counter30202</b> (1) 128:5 <b>counterparts</b> (2) 35:5 68:3 <b>counterterrorism</b> (1) 21:7 <b>country</b> (1) 116:6 <b>couple</b> (5) 21:16 111:12 165:13 166:10 211:3 <b>coupled</b> (1) 134:14 <b>course</b> (35) 2:24 5:20 8:9 12:7,18 19:7 20:12 21:6 23:4 24:6,10 26:7 30:19 55:22 63:20 67:10 72:17 73:10 108:14 112:21 118:3,25 119:11 123:9 137:21 162:20 165:5,10 167:15 192:2 194:4 195:6 202:5,7 217:8 <b>cover</b> (3) 26:12 172:4 187:18 <b>covered</b> (3) 27:19 74:20 78:17 <b>covering</b> (3) 78:15 79:20,22 <b>created</b> (1) 157:22 48:4,24 53:15 <b>credit</b> (1) 127:10 <b>crime</b> (1) 80:23 <b>criminal</b> (2) 17:9 138:15 <b>criminally</b> (1) 86:23 <b>criteria</b> (3) 11:7 140:1,11 <b>criterion</b> (2) 138:18 139:16 <b>critical</b> (22) 5:9 34:22 35:12,15 39:8 73:11 77:14 80:7,25 81:2,23 82:18,23 86:11 87:10 109:17,20,22 150:9 158:6 179:22 208:20 <b>criticality</b> (1) 5:3 <b>critically</b> (1) 98:1 <b>criticised</b> (1) 124:11 <b>criticising</b> (3) 24:1 72:13 92:7 <b>criticism</b> (7) 108:12 111:7 123:2,4 124:20 130:2 207:2 <b>criticisms</b> (2) 73:14 159:11 <b>crop</b> (1) 195:3 <b>cropping</b> (1) 195:18 <b>crossorganisational</b> (1) 161:13 <b>crosspurposes</b> (1) 55:12 <b>crowded</b> (4) 60:19 61:2 138:5 139:13 <b>crucial</b> (4) 115:9,11,15 148:20 <b>cruelly</b> (1) 87:3 <b>crying</b> (1) 47:23 <b>cultural</b> (4) 138:6 139:18,20 161:13 <b>current</b> (2) 75:15 108:8 <b>cut</b> (3) 13:24 109:1 111:3 <b>cutbacks</b> (1) 105:5 <b>cuts</b> (2) 105:17 106:7
C				D			

<p><b>davies (24)</b> 116:13,14,19 131:16,17,22 132:7,9,10 133:9,12,19 134:12 137:21,23 139:9 140:12,25 141:3,14 157:10 159:9 161:25 219:9 <b>day (19)</b> 15:2 20:21 41:19,19,20 42:15 44:16 67:17 80:22 98:22 104:12 121:10 124:2 130:5 147:14 162:25 163:12 166:9 167:13 <b>day985189 (1)</b> 89:23 <b>days (4)</b> 21:14,15 22:5 118:3 <b>daytoday (3)</b> 76:3 109:21 169:12 <b>de (34)</b> 127:10,20,25 162:12 164:2,5,6,10 178:17 180:3 187:15 188:16 189:8 191:11 196:1,4 197:2,14 199:22 200:5,17 205:19 206:17 210:5 211:21,23 213:7 214:4,25 215:12 216:17 217:21,23 219:12 <b>deal (18)</b> 6:18 19:18 21:3 42:6 60:2 73:12 107:3 131:13 170:4 189:12 191:1 193:10 194:21,25 197:2 198:25 211:23 212:2 <b>dealing (30)</b> 12:1 15:5,8 21:1 22:21 28:23 32:14 34:25 35:25 37:21 39:2 44:22 57:21 58:19 64:2 70:19,22 71:18 81:2 84:8 85:8 86:20 102:19,24 105:17 143:22 153:1 162:23 179:20 211:6 <b>deals (4)</b> 63:4 75:4 79:11 189:16 <b>deal (5)</b> 6:4 89:7 95:18 155:12 171:4 <b>debbie (1)</b> 194:13 <b>debrief (10)</b> 3:15 119:19 120:1,6 121:8,14,24 124:9 133:5 158:9 <b>debriefs (5)</b> 122:23 125:3 132:15,23 133:14 <b>decide (3)</b> 66:22 217:11,11 <b>decided (6)</b> 25:16 35:7 44:19 102:21 122:13 192:24 <b>deciding (2)</b> 84:15 105:9 <b>decision (64)</b> 1:12,16 2:1 4:12,16,17 5:5,18,21 27:22 29:19 31:10,17 33:8 40:18 41:23 42:2,10 49:21,23 63:12 68:19 84:19 92:20 96:24 97:6 98:1,2,20 99:1 103:11,12 117:15,18,24 118:6,12,13,21 119:12,23 120:7,11 122:5,17,23 123:1,13,15,17 125:3,8 129:12 130:8 134:16 150:7,14 156:6,21,23 160:8 208:13,16 209:21 <b>decisionmaking (9)</b> 3:25 72:18 74:2,5 85:21 122:16 123:10 132:18 142:23 <b>decisions (21)</b> 1:25 3:4,21 4:3,7 5:1,3,8,9 22:23 85:2 97:4 98:13,14,18 99:19 100:2,3,9 124:22 176:21 <b>decisive (3)</b> 15:15 16:7 17:7 <b>declaration (44)</b> 1:14 2:10 6:2,7 12:10,14 18:9,25 20:18,23 23:1 24:19 27:24 28:20 29:14,19 39:11 45:3,9 117:1,6,8,12,14,15,23,25 118:4,12,15 119:13,23 120:8 121:2,25 122:6,14 126:4 129:2,12 146:14,20 196:7 197:2 <b>declare (12)</b> 6:4 10:16 19:12 20:2 44:20 62:4,6 63:13 111:13 145:20 146:16 150:7 <b>declared (36)</b> 2:3 10:24</p>	<p>11:3,13 12:18 14:15 18:2,20 19:16 20:15 25:24 40:14 48:18 52:13,16 65:13 88:11 89:22,25 90:2,10 103:17 117:19 120:18 127:2,6 129:18 139:5 146:20 148:16,24 150:21 167:3 196:9 202:13 210:25 <b>declaring (9)</b> 10:19 18:13 25:17 48:14 90:7 132:19 142:23 145:19 146:7 <b>deceased (1)</b> 45:23 <b>dedicated (2)</b> 174:5,9 <b>deeper (2)</b> 92:8 107:20 <b>default (1)</b> 17:8 <b>defensible (1)</b> 4:3 <b>defined (3)</b> 113:20 138:12 139:2 <b>defining (1)</b> 137:24 <b>definite (2)</b> 97:6 103:21 <b>definitely (17)</b> 1:18 11:22 22:18 25:1 38:23 43:14,20 45:23 53:10 62:12 97:5,6 123:5 143:2 148:21 149:3,17 <b>definition (4)</b> 71:9 137:9 140:16 149:10 <b>degree (6)</b> 18:21 28:11 58:23 70:18 185:20 188:21 <b>delay (2)</b> 10:20 18:13 <b>delayed (2)</b> 18:9 19:4 <b>delegate (1)</b> 33:8 <b>delegated (3)</b> 19:22 32:12 46:14 <b>delegation (2)</b> 32:21,23 <b>deliberate (17)</b> 18:22 19:1 31:10,17 41:23 98:20 118:5,21 122:5,22 123:13,15,17 125:8 133:6,7 134:18 <b>deliberately (6)</b> 19:4 121:24 122:13,15 125:2 132:18 <b>delicate (1)</b> 30:15 <b>delivery (1)</b> 33:22 <b>demand (12)</b> 32:19 78:20 79:24 83:19,24,25 96:17 98:16 120:22 121:3 159:18 160:2 <b>demanding (1)</b> 83:3 <b>demands (3)</b> 5:3 42:17 110:21 <b>demonstrate (2)</b> 136:22 152:20 <b>demonstrates (1)</b> 141:25 <b>denise (2)</b> 198:12 199:10 <b>depart (1)</b> 1:12 <b>department (1)</b> 81:12 <b>dependent (1)</b> 211:15 <b>depending (3)</b> 154:17,17 163:10 <b>depends (1)</b> 211:17 <b>deploy (9)</b> 10:5 39:17 50:25 68:4 84:16 149:19 151:10 208:13,16 <b>deployed (13)</b> 7:17,18,22 8:2 14:15 31:1 93:24 94:10 96:13 114:18 155:9 208:11 210:17 <b>deploying (5)</b> 6:16 8:3 12:25 50:24 149:12 <b>deployment (6)</b> 9:3 85:1 149:1 154:18 157:7 177:10 <b>deployments (2)</b> 136:16 137:6 <b>describe (1)</b> 139:14 <b>described (7)</b> 21:12 78:18 79:22 148:1,17 169:17 178:20 <b>describing (3)</b> 17:24 52:23 173:2 <b>description (3)</b> 168:8 176:10 178:3 <b>descriptions (1)</b> 146:23 <b>designed (3)</b> 24:10 138:4 139:11</p>	<p><b>desk (1)</b> 170:16 <b>desks (1)</b> 109:17 <b>despite (2)</b> 92:2 118:20 <b>detail (11)</b> 27:20 29:13 40:5,10 70:6 158:15 166:24 194:10,19 197:4,4 <b>detailed (2)</b> 148:3 207:1 <b>details (4)</b> 46:4 59:17,17 114:17 <b>detective (1)</b> 198:11 <b>determine (5)</b> 44:12 68:3 151:20 153:25 208:11 <b>determining (1)</b> 75:16 <b>detonating (1)</b> 86:23 <b>detonation (2)</b> 141:16,24 <b>detract (1)</b> 56:6 <b>develop (1)</b> 16:9 <b>developed (2)</b> 37:15 207:13 <b>developing (7)</b> 17:21 18:14 25:21 39:5 67:1 77:14 83:6 <b>development (6)</b> 21:14,14 22:5,24 101:13 111:17 <b>deviation (1)</b> 41:1 <b>device (7)</b> 5:4 16:8 61:23 139:24 141:17,25 142:5 <b>devices (3)</b> 93:20 138:9 145:11 <b>dexter (3)</b> 37:19 153:11 155:11 157:2,4 <b>dictaphone (29)</b> 2:9,13,20,23 4:13,21 5:8,17 12:16 24:18 26:22 27:10 48:14 49:11,25 59:10 90:21 94:18,21 100:23 102:8 107:1 118:13 125:20 126:1,16 130:21 200:23 203:2 <b>dictate (1)</b> 61:21 <b>didnt (67)</b> 7:9 13:24,25 18:13,25 23:9,11 25:17 26:19 27:6 30:23 39:10,11 40:17,17,18,20 41:1,8,10 43:17 44:21 46:5 49:23 56:18 71:22 72:14 73:2 79:2 88:8 93:12 95:7 96:25 99:3,18 102:17 106:24 110:24 113:9 114:6 118:4,12,14 123:23 124:17 125:1,9 128:15 130:4,14,16 131:1 133:20 134:6 149:15 150:20 152:17 157:18 175:11 177:21 179:1 180:21 181:11,12 196:12 202:24 211:18 <b>difference (5)</b> 12:22 101:4 107:11 119:5 172:24 <b>different (28)</b> 23:20,21 33:11 50:21 57:7 62:11 77:17 87:3,16 108:23 120:11 122:11 133:22 158:22 159:4 165:9,15,16 176:2 177:15 178:11,21 179:18,20 191:20 192:1 209:12 214:5 <b>difficult (10)</b> 10:10 28:22 29:1 65:11 67:9 88:19 92:19 121:21 137:18 144:24 <b>difficulty (2)</b> 188:19 215:16 <b>dig (3)</b> 92:7 97:17 107:20 <b>dimension (1)</b> 47:16 <b>dimensions (1)</b> 170:17 <b>direct (11)</b> 13:4 16:24 46:18 58:1 65:12 77:2 85:24 153:1,10 176:23 209:6 <b>directed (4)</b> 13:13 19:18 135:2 137:24 <b>directing (1)</b> 17:12 <b>direction (5)</b> 13:16 14:18 15:14 17:9 169:24 <b>directly (7)</b> 43:10 84:13 95:6 105:22 109:14 152:12 153:20 <b>disadvantages (2)</b> 207:7 209:20</p>	<p><b>disagree (14)</b> 11:12,20 28:1 32:24 45:10 52:18 61:19 65:9 66:20,20 70:9 98:14 106:3 142:14 <b>disagreeing (1)</b> 67:9 <b>disagreement (3)</b> 217:10,12,13 <b>discretion (1)</b> 28:11 <b>discuss (4)</b> 36:22 44:13 45:7 162:5 <b>discussed (7)</b> 9:9 20:21 61:23 67:16 83:1 136:10 161:18 <b>discussing (8)</b> 65:15 70:3,3,4 101:12 136:9 152:18 201:18 <b>discussion (10)</b> 14:5,10 24:18 66:24 67:3 71:7 82:11 136:6 186:23 198:21 <b>disobeyed (1)</b> 209:6 <b>disorder (1)</b> 104:16 <b>dispatchradio (1)</b> 79:16 <b>dispersing (1)</b> 98:24 <b>disregard (1)</b> 27:23 <b>distance (3)</b> 170:19,21 171:2 <b>distinct (2)</b> 142:2 148:24 <b>distinction (2)</b> 135:13 136:24 <b>distracting (1)</b> 177:5 <b>distraction (3)</b> 31:7,11 152:21 <b>distractions (1)</b> 31:3 <b>districts (5)</b> 78:5,17,18 79:17,22 <b>dividers (1)</b> 182:4 <b>dividing (1)</b> 31:21 <b>divisional (4)</b> 35:3,16 37:11 174:3 <b>divisions (1)</b> 83:4 <b>document (28)</b> 52:4 59:5 60:12 63:7 66:9 74:25 79:10 80:11 89:7,9 90:20 95:1 101:6 120:6,14 121:18 137:15,24 138:22 171:7,17 172:1 174:19 176:1,8 175:6 217:2 <b>documented (1)</b> 33:21 <b>does (23)</b> 23:22 28:10 29:14 31:20 45:16 47:15 51:13 56:5 67:19 81:13 83:15 119:5 123:8 125:14 129:22 131:6 140:4 150:21 152:19 162:5 172:20 192:9 213:7 <b>doesnt (16)</b> 24:6 27:9 31:20 34:10 42:1,3 52:16 62:3 82:7 114:13 142:15 144:23 161:14 163:17 188:17 214:1 <b>dog (4)</b> 95:22,24 152:15 200:8 <b>doing (19)</b> 2:22 31:18 35:12 51:9 52:22 60:10 85:25 111:7 114:12 117:21 123:5 130:9,10,25 197:15 199:19,20 205:12 209:11 <b>done (37)</b> 3:17 8:6 13:8 17:6 30:10 32:20,22 56:15 57:18,18 59:1,3,4 75:7 87:18 98:18 99:8 103:3 108:2,3 125:10 127:8,10 154:23 159:20 166:1,2 174:7,10,13,16,17 189:5 199:23 200:2 212:8 <b>dont (97)</b> 1:21 4:7 8:11 9:1,1,9,12 10:17 11:3 12:1 18:12 21:18,23,23 23:17,18 25:11 26:13 29:23 30:1 33:6 34:2 40:11,12 19:20 45:13,19,25 55:11 57:3 61:9 63:11 64:6 66:8 70:5 73:20 22 76:7 80:19 81:21 82:4 91:6 93:2 97:14 99:23 103:7,18,18,20 106:4 107:9,17 108:1,7 109:2 111:23 112:7,11,14,25 113:8,10 117:22 122:19,20</p>	<p>123:18 127:23 129:3,8 136:10 140:14,23 146:10 148:3 150:14 156:11 166:11 168:22 188:13 189:9 192:20 193:7,12 194:10,19 196:8 197:3,17 201:1,15 203:25 204:2 206:13 209:6 216:18,20 <b>door (1)</b> 210:4 <b>doors (2)</b> 13:20 57:19 <b>doubt (9)</b> 10:12 14:13 71:5 98:16 99:18 127:23 129:6 134:2 171:10 <b>down (32)</b> 3:21 5:7 12:2 14:24 18:21 19:6,7 36:15,19 37:25 39:1 52:11 54:11 67:6 89:1 97:17 114:9,17 126:9,19 138:20 151:1 154:2 179:24 180:5,15 181:18 193:21 195:21 215:3,25 216:8 <b>downstairs (1)</b> 183:1 <b>draw (5)</b> 41:1 119:2 123:2,4 125:9 <b>drawing (1)</b> 208:19 <b>drawn (1)</b> 206:21 <b>drill (2)</b> 19:7 127:11 <b>drilled (1)</b> 22:20 <b>driving (1)</b> 186:10 <b>dual (1)</b> 153:18 <b>due (12)</b> 26:7 30:19 73:10 99:6 108:13 120:22 121:3,22 127:10 192:2 202:7 211:8 <b>duplicate (1)</b> 200:4 <b>duplicating (1)</b> 199:17 <b>duration (1)</b> 208:21 <b>during (20)</b> 5:16 38:4 46:13,15 63:20 66:8,21 67:1 81:1 83:19 110:14,21 119:10 122:12 155:5 172:10 174:2 176:17 183:22 210:17 <b>duties (7)</b> 80:15 152:20 154:8 177:12 194:15 211:4,10 <b>duty (47)</b> 32:11 35:21 46:9 73:10 77:16 78:9,9 81:19,24 82:8,12,15,18,24 83:1,13,15,17 84:1 159:17,22 164:15 165:2 168:15,19,25 169:2,14,15,20,21 170:1,17 187:24 190:1 191:17 193:11 196:24,25 198:8 201:10 206:17 208:4,15,18 209:3 216:14 <b>dynamic (1)</b> 2:17 <b>dynamics (1)</b> 25:20</p>	<p style="text-align: center;"><b>E</b></p> <p><b>e (2)</b> 78:17 219:1 <b>earlier (13)</b> 11:13 12:18,20 18:3 19:16 20:17 50:13 119:10 122:10 187:14 188:25 191:21 215:14 <b>earliest (2)</b> 57:13 148:7 <b>early (43)</b> 2:16 3:19 11:21 13:5,20 14:14 20:2 21:17 37:13 38:21 39:7 46:9 53:4,4 54:17 56:4 57:12,19,19 58:22 60:1,14 61:10 86:11,16 87:9 88:19 89:2,4,10 98:21 109:19 111:16 114:1 125:22 129:4,5 144:19 158:6 192:15 194:20 207:11 210:13 <b>ears (1)</b> 49:4 <b>easier (2)</b> 42:16 103:10 <b>easily (3)</b> 10:25 11:1 136:16 <b>easy (2)</b> 19:6 130:5 <b>economic (3)</b> 138:7 139:19,22 <b>effect (3)</b> 97:3 106:17 142:21</p>	<p><b>effective (5)</b> 33:22 43:22,23,25 175:21 <b>effectively (8)</b> 34:12 52:4,10 66:16 91:16 138:13 173:6 202:20 <b>efficient (1)</b> 212:2 <b>efficiently (1)</b> 79:5 <b>effort (1)</b> 204:9 <b>efforts (1)</b> 157:13 <b>eight (1)</b> 158:15 <b>either (15)</b> 13:2 21:24 26:20 39:18 45:22 55:11 63:21 68:7 74:9 104:15 119:4 162:16 178:11 201:25 216:3 <b>elaborate (1)</b> 82:23 <b>clearing (3)</b> 165:8,12 166:10 <b>element (6)</b> 21:7 55:21 100:14 153:5,10 159:11 <b>elements (2)</b> 48:3 165:19 <b>eliminate (1)</b> 145:10 <b>else (17)</b> 3:15 19:18,23 25:6 31:18 35:9 45:7 47:22 101:15 118:13 122:19 123:20 153:2 170:24 185:15 208:20 192:12 <b>elsewhere (2)</b> 51:8 96:21 <b>embarrassing (1)</b> 113:7 <b>embedded (1)</b> 185:9 <b>emerged (1)</b> 119:8 <b>emergency (50)</b> 2:3 15:19 16:14,19 17:3 19:22 25:23 27:24 28:18 29:15,20 30:23 34:12,24 35:23 43:8,24 44:14,24 45:4 50:1 54:5 56:10 64:10 68:4 93:4 117:16 118:5,16 121:21 129:13 134:17 157:15 160:14,21 161:12 165:10 172:7 177:1 182:13 190:10 210:7 211:5,11,13 214:8 216:23 217:5,6 <b>emphasis (1)</b> 142:14 <b>emphasising (1)</b> 89:21 <b>employed (1)</b> 164:18 <b>enable (1)</b> 162:18 <b>encapsulated (1)</b> 43:3 <b>encourage (1)</b> 76:7 <b>end (10)</b> 2:5 47:7 67:16 107:23 127:20 142:24 128:1 156:6,21 180:20 212:22 <b>ending (1)</b> 156:2 <b>ends (1)</b> 147:8 <b>england (1)</b> 114:8 <b>enlarge (1)</b> 47:11 <b>enough (3)</b> 10:15 94:6 162:15 <b>ensure (7)</b> 4:3 17:14 30:11 54:18 66:13 108:2,3 <b>ensuring (1)</b> 54:4 <b>enter (1)</b> 52:18 <b>entered (1)</b> 52:17 <b>entering (2)</b> 67:2 149:6 <b>entirely (4)</b> 62:10 133:22 163:16 211:5 <b>entirety (2)</b> 81:4 88:16 <b>entitled (1)</b> 106:8 <b>entries (3)</b> 7:6 91:24 180:9 <b>entry (16)</b> 51:4 92:5 102:20 144:1 151:14 180:18 188:16 198:24 199:4 200:11,15,19 201:24 202:25 203:4 214:4 <b>envisage (1)</b> 66:18 <b>envisaged (1)</b> 68:6 <b>equally (1)</b> 131:14 <b>equipment (5)</b> 2:14 4:21 149:13 160:22 177:9 <b>equivalent (4)</b> 35:8 137:1 175:1 191:17 <b>err (1)</b> 20:1 <b>especially (1)</b> 185:9 <b>essence (1)</b> 6:15 <b>essential (2)</b> 84:7 210:12 <b>essentially (2)</b> 55:8 59:3</p>	<p><b>establish (3)</b> 44:23 73:25 209:7 <b>established (5)</b> 13:20 43:23 119:17 172:5 175:3 <b>establishing (1)</b> 212:24 <b>et (1)</b> 76:4 <b>even (18)</b> 2:6 40:16 43:25 44:12 49:23 88:3 99:8 102:20 109:18 110:21 122:15 124:8 132:23 148:15,23 172:1 192:9,15 <b>evening (14)</b> 47:22 172:17 177:19 178:2 186:7,24,25 187:14,22 201:10,14 206:20 216:2,15 <b>event (15)</b> 7:9 38:9 72:14 73:16 74:7 85:12,13 104:16 125:4 134:14 148:9 149:22 153:9 186:4 205:19 <b>events (12)</b> 81:2 104:12 106:5 138:5 139:13 143:14,18 166:10,15 172:17 182:5 187:16 <b>ever (20)</b> 43:22,24 105:24 110:16,18 113:3 157:1,3 161:2 165:6 166:18 168:11 171:8,11,14 178:24 183:11,13,18 216:3 <b>every (9)</b> 5:5,10 45:11 51:11 74:4 130:6 197:10,12,13 <b>everybody (7)</b> 55:20 56:3 157:13 186:12 199:1 213:11,15 <b>everybodys (1)</b> 198:16 <b>everyone (9)</b> 18:6 79:1 110:3 134:13 149:10 151:18 157:16 190:3 217:24 <b>everyones (3)</b> 35:18 137:23 194:21 <b>everything (6)</b> 3:13 28:15 82:3 105:23 123:20 199:8 199:10 199:10 9:8 35:20 <b>everywhere (1)</b> 147:6 <b>evidence (56)</b> 7:8,18 8:22 15:2 27:3,10,16 31:12 38:10 42:19 44:16 48:25 49:5 52:19 57:15 62:18 67:6 86:10 89:12,17,18,24 98:8 104:2,7 108:3 113:22 116:20 119:16 121:16 123:22 127:20,24 128:1 131:15 137:7 138:23 141:8 142:22 143:3,5 145:12 147:14,16 148:14 150:20 153:3 162:22 163:4,7,11,19 164:3 168:20 199:3 217:13 <b>exact (2)</b> 20:23 192:13 <b>exactly (11)</b> 29:21 37:6,9 43:3 90:6,19 108:22 115:17,24 </p>
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130:1 177:19 187:4 190:20  
**expecting (1)** 204:6  
**experience (22)** 83:20  
 105:17 110:5,6 112:17,20  
 121:4 135:8,9 136:12,25  
 149:18,21,24 151:13 161:2  
 178:17 185:20 187:2  
 209:16 210:16 215:18  
**experienced (15)** 78:24  
 83:18 84:21 85:20,24  
 97:18 98:17 102:6,11  
 111:1 120:23 137:3,4,5  
 210:13  
**experiences (1)** 208:19  
**expert (1)** 207:2  
**expertise (1)** 10:12  
**explain (8)** 27:1 33:4,10 75:6  
 102:16 103:10 108:8 205:7  
**explained (5)** 20:7 54:24  
 90:5 103:3 104:12  
**explanation (8)** 102:22  
 133:1,16,23 134:15,17,23  
 160:20  
**explo (1)** 152:15  
**exploding (2)** 9:10 61:24  
**exploitation (1)** 67:13  
**explode (4)** 171:25 184:7,17  
 207:4  
**explored (1)** 118:8  
**explosion (5)** 6:23 48:7  
 62:20 193:17 195:7  
**explosive (4)** 138:9 139:24  
 141:17,24  
**explosives (3)** 95:22,24 200:8  
**expressed (2)** 82:22 94:17  
**expression (5)** 85:7 101:1  
 111:21 112:21 113:12  
**expressly (2)** 19:16 171:12  
**extended (1)** 154:9  
**extent (4)** 66:20 96:20  
 145:21 167:10  
**extra (1)** 192:8  
**extract (1)** 151:16  
**extraordinary (1)** 157:17  
**extremely (5)** 14:7,8 162:17  
 166:17 168:21  
**eye (2)** 9:16 96:19  
**eyes (2)** 14:9 49:4

---

**F**

**face (2)** 10:1 59:22  
**faced (1)** 163:8  
**faceless (1)** 97:15  
**facilitated (3)** 72:12,13,19  
**facility (2)** 4:23 175:6  
**facing (2)** 14:19 124:19  
**Factors (1)** 75:16  
**fail (6)** 86:12,13,16 89:2,3,10  
**failure (9)** 10:4 53:22 150:3  
 157:20,24 158:5 161:13  
 166:4,5  
**fair (17)** 20:13 25:18 27:8  
 31:9 38:17,20,21 93:17  
 118:19 133:25 134:1 146:9  
 149:16 156:3 163:2 178:3  
 188:22  
**fairest (1)** 116:12  
**fairly (9)** 22:9 34:5 46:9  
 48:21 60:14 99:5 101:4  
 187:19 189:5  
**fairness (1)** 68:7  
**fallback (1)** 187:6  
**false (3)** 9:17 10:24 12:4  
**familiar (6)** 121:15 137:23  
 149:10 169:7 179:14  
 212:12  
**familiarise (1)** 76:10  
**familiarity (3)** 188:22 213:21  
 214:11  
**families (3)** 59:12 73:10  
 99:22  
**family (1)** 81:14  
**far (45)** 2:23 18:19 22:9,24  
 25:5 30:16 43:15 44:3,6  
 63:24 66:23 72:8 73:3  
 74:5,7,8 84:9,11 85:7,16

86:10 95:19 97:11  
 99:22,23 104:7 108:2  
 109:3 119:9 125:17 127:22  
 162:10 168:14 170:18  
 171:1 175:8 181:16 186:2  
 194:9 199:15 201:21  
 212:11,22 215:17 217:20  
**fastmoving (2)** 17:21 173:6  
**fatalities (2)** 91:22 92:3  
**fault (7)** 30:5 41:7 54:16  
 124:23 156:17 163:9,15  
**faults (1)** 183:3  
**fcp (16)** 39:7,12,13 44:18,18  
 54:16,18,24 55:3,10,13  
 56:3,13 68:2,8 88:17  
**fcps (1)** 157:22  
**fdo (49)** 9:1 23:22 29:8  
 31:15 33:21 50:20 51:14  
 52:7,14 53:1,3  
 58:7,13,15,22 59:21,25  
 60:4,9 76:1 83:14,16,19,25  
 85:6,11 98:16 108:7,21  
 109:8,12,15,16,21 110:21  
 111:1 120:22 135:9 152:24  
 154:8 169:11 190:12,20  
 192:19,23 193:4 195:9  
 200:7 207:19  
**fdos (7)** 8:4 23:11,20 51:11  
 143:15 144:10 195:16  
**fds (5)** 109:9 125:21,23  
 126:9 203:13  
**fears (1)** 11:6  
**feature (1)** 150:19  
**features (1)** 47:14  
**february (1)** 23:7  
**fed (1)** 36:8  
**feed (1)** 160:6  
**feedback (2)** 36:8 111:18  
**feel (2)** 107:16 122:20  
**feet (1)** 162:23  
**fell (2)** 31:8 41:7  
**felt (3)** 107:16,23 122:25  
**few (7)** 6:5,22 53:17 75:6  
 86:9 89:16 100:11  
**final (4)** 176:8 202:25 203:1  
 211:23  
**finally (6)** 30:20 46:8 59:5  
 101:19 132:7 194:9  
**find (7)** 13:13,14 59:14  
 150:18,20 151:2 204:9  
**finding (2)** 106:16 137:18  
**fine (2)** 34:20 132:2  
**finish (5)** 41:15 43:5 131:15  
 158:10 217:18  
**finished (5)** 27:20 73:24  
 116:20 152:14 211:20  
**fire (34)** 22:2,10 25:10 36:13  
 37:10,12 40:13 41:23 42:6  
 50:9 71:1 74:18,24 76:25  
 91:16 92:1,13 93:17  
 94:5,10,16 95:1 96:7,13,15  
 97:1 120:13,25 124:13  
 133:17 145:2 151:9 211:7  
 215:23  
**firearm (10)** 32:3 103:2  
 138:22,24 140:19,24  
 141:20 142:7,22 143:4  
**firearms (59)** 3:24 7:14  
 8:8,25 9:7 11:10 12:8,13  
 13:7 14:16,25 16:18  
 17:9,17 21:5 22:19 25:22  
 26:4 35:1,2,9,11,16 42:7  
 48:2 49:24 50:5 66:21,22  
 69:25 70:11,13 88:8 91:8  
 93:13 100:18 101:8 103:16  
 109:18 135:8,11,22  
 136:14,21 137:11 140:5,17  
 141:9 142:15 151:1 152:24  
 153:10,25 154:4,13,15,18  
 155:9 156:18  
**firearmswise (1)** 114:5  
**first (65)** 1:22 2:21 3:2,12,17  
 9:6,11 11:9 18:8,12 40:9  
 44:18 46:22 50:3 52:14  
 53:17 54:1 83:4 88:23  
 91:21 96:23 98:22 119:8

122:14 125:21,22 129:11  
 132:12 133:14 135:7  
 143:21,25 149:9 151:18  
 158:11 162:13 172:25  
 173:12,24 174:7 177:20  
 179:19,22 183:15 184:5  
 187:4,18 188:7,17 189:25  
 190:6,24 191:11,11 193:3  
 196:24 203:9,19 204:1  
 205:19 208:20 210:20  
 211:20 216:9,15  
**firstly (1)** 201:6  
**fit (3)** 203:6,12,21  
**fits (1)** 172:23  
**five (2)** 41:20 211:21  
**flavour (1)** 168:1  
**flaw (1)** 129:23  
**flexibility (3)** 28:6,10 183:5  
**focal (2)** 35:21 177:3  
**focus (4)** 72:5 73:8 126:6  
 169:20  
**focused (4)** 17:22 69:25  
 157:12 159:11  
**focusing (1)** 97:10  
**follow (6)** 10:8 38:24 88:20  
 117:10 166:5 192:9  
**followed (3)** 13:1 114:10  
 166:9  
**following (10)** 23:4 24:11  
 60:25 111:10 138:3 141:6  
 147:25 172:9 176:9 197:2  
**followups (1)** 211:3  
**foot (1)** 37:17  
**football (1)** 168:4  
**footprint (1)** 104:13  
**force (57)** 32:11 35:21 51:12  
 78:9,9 81:19,24,24  
 82:8,12,15,18,24  
 83:1,13,15,17 84:1 104:21  
 105:2 109:17,22 113:15  
 129:17 163:11 164:15  
 165:2 168:18,25  
 169:2,14,15,15,20,21  
 170:1,9,17 172:14 174:15  
 175:24 178:4 181:23  
 183:9,13,19 187:24 191:17  
 193:11 196:25 197:23  
 204:3 206:12 208:15,18  
 209:3 216:13  
**forces (3)** 35:5 114:11  
 215:22  
**forcewide (3)** 78:10,12  
 190:16  
**ford (3)** 194:13 196:25 205:2  
**forecast (1)** 75:13  
**forefront (4)** 165:21  
 166:12,13,15  
**foresee (1)** 29:3  
**foreseeable (1)** 75:16  
**forget (1)** 61:12  
**forgive (2)** 93:7 210:5  
**forgot (2)** 37:16 42:19  
**forgotten (2)** 67:11 122:12  
**form (7)** 6:10 97:15 143:3  
 165:8 181:14 187:19 199:1  
**formal (2)** 21:4,9  
**formed (1)** 31:7  
**forming (1)** 175:16  
**forms (1)** 141:19  
**forward (8)** 9:11 37:1,19  
 44:13 54:13 174:25 180:18  
 202:4  
**found (4)** 38:11 182:16  
 211:5,13  
**four (1)** 41:20  
**fourth (2)** 211:23 216:8  
**foyer (2)** 26:10 193:17  
**frame (2)** 149:2,3  
**free (5)** 38:7 190:3,14 191:4  
 207:20  
**frequently (1)** 66:12  
**fresh (2)** 73:15 74:7  
**friday (2)** 1:1 80:23  
**front (6)** 1:19 100:14  
 172:4,5 180:22 193:13  
**frs (3)** 63:21 64:12 68:3

**full (14)** 8:7 11:24 15:6 72:17  
 73:17 75:15 95:7 102:11  
 131:23 133:3 143:21  
 150:11 164:10 207:20  
**fuller (2)** 18:18 39:1  
**fullscale (1)** 110:1  
**fully (17)** 6:5 9:16 15:19  
 25:2 31:19 34:2 39:15 80:8  
 96:25 97:7 142:16 144:20  
 145:18 146:11 160:6  
 175:20 198:3  
**function (5)** 153:11  
 176:3,5,21 177:1  
**functioning (2)** 80:8 84:8  
**functions (1)** 51:19  
**funding (2)** 104:17,20  
**furniture (1)** 185:3  
**further (23)** 6:3 20:14,16  
 25:17 54:12 62:1 78:19  
 79:23 82:11 96:12 116:23  
 136:8 138:20 153:5,9  
 155:1 156:12 162:5 170:19  
 182:25 184:17 216:17  
 219:8  
**future (4)** 19:8 108:4 148:9  
 163:2  
**fwfn (8)** 6:20 9:19 38:12  
 43:12 44:3 117:20 150:25  
 194:12

---

**G**

**gain (1)** 150:13  
**gained (1)** 46:17  
**gap (1)** 131:21  
**gapfc (2)** 153:14,24  
**gather (2)** 130:20 173:8  
**gave (15)** 12:11 16:18 38:7  
 40:10 44:16 46:24 89:18  
 94:12,15 132:15 146:10,15  
 148:16 157:12 195:9  
**gear (1)** 93:18  
**general (5)** 84:8,10,11 85:16  
 190:14  
**generally (6)** 3:24 85:10  
 158:3 169:2 204:16 217:7  
**geographic (1)** 79:17  
**geographically (1)** 77:10  
**get (41)** 4:8 8:23 9:3 19:11  
 30:23 31:18 33:9 34:18  
 35:3 38:14 39:15,16 50:2  
 60:10 63:2 69:18 82:5  
 84:17 91:5 97:16 99:23  
 109:21 123:21,23 126:24  
 144:19 157:3 160:5 162:10  
 169:12 172:4 185:9,11,12  
 190:9,10 196:6 200:1  
 214:21 217:18,20  
**getout (1)** 23:19  
**gets (3)** 36:19 51:3 121:1  
**getting (12)** 9:5 12:17 25:25  
 30:18 36:7,11 53:5 61:14  
 91:10 114:5 115:8,10  
**giladi (1)** 23:5  
**give (41)** 8:9 15:1,3,7  
 16:4,13 19:13 27:11  
 28:10,11 35:24 36:2 59:17  
 70:18 76:5,7 94:19 99:4  
 102:23 103:6 108:3 109:16  
 128:1 130:1 133:16,22  
 154:9 162:21 163:4 164:10  
 167:5 168:1 169:24 170:18  
 171:11 190:5,20 194:13  
 195:17 199:3 203:1  
**given (33)** 13:16,23 14:18  
 15:13 17:6,15,20 20:9  
 48:24 67:1 71:24 86:11  
 88:1 89:17 92:16 108:21  
 113:4,22 118:25 121:13  
 125:16 132:23 133:23  
 137:8 146:14 148:4 153:3  
 163:6 178:2 184:2 207:1  
 210:21 216:3  
**gives (3)** 45:18 176:9 180:11  
**giving (12)** 16:21 32:13  
 37:18 53:18 85:6 102:22

107:1 108:7 121:16  
 127:20,24 148:9  
**glad (2)** 123:22 134:6  
**gmfrs (4)** 51:21 65:24 149:5  
 150:15  
**gmp (47)** 23:22 32:7 34:1  
 38:18 42:18 51:4  
 72:4,6,9,17 73:2,8,14,23  
 74:6 78:3,4 80:3 83:1  
 84:12 85:16 104:9  
 105:3,9,13,18,25 108:6  
 115:18,18 116:3,5,7 117:5  
 128:12 144:14 164:21  
 168:14 171:15 183:15  
 184:18 193:21 204:16  
 212:6 213:4,7 215:24  
**gmgs (4)** 38:19 104:22  
 197:23 211:9  
**goes (7)** 36:23 44:6 60:19  
 61:1 66:23 76:4 173:10  
**going (118)** 1:22 2:17,18 6:2  
 7:6 9:6,15 10:20 14:24  
 15:15 16:2,16,24  
 17:8,10,20 19:8 23:18 24:3  
 25:6,8,10,13 27:1,18  
 28:16,16 29:12 30:3,16  
 31:15 33:4 34:6 35:17  
 36:25 37:6,10 42:10 46:3  
 47:5 49:13 52:9 53:2,10  
 55:9,23 57:20 58:19  
 60:10,13 61:25 62:6 63:13  
 65:18 73:22 79:12 83:23  
 86:7 87:24 89:15 101:9,11  
 103:25 106:22 110:3,9  
 111:6,11 113:18 118:24  
 119:2 120:3 124:23 125:19  
 126:13,23 127:23 128:7  
 130:10,15,17 131:3 132:10  
 135:9 140:22 142:12  
 143:23 144:21 150:15  
 151:15 160:8 164:2  
 166:8,15,24 168:18 169:20  
 170:5 171:4 172:21 174:20  
 185:13 187:10,16,17,18,19  
 192:3 193:20 194:12,25  
 196:19 202:4,23 205:11  
 208:23 210:10 216:22  
**gold (11)** 14:11 15:22 175:22  
 176:23,24 182:6,7  
 196:17,22,23 205:13  
**golden (7)** 147:12 179:14,17  
 181:3 208:17,22,23  
**gone (14)** 9:20 20:4 24:22  
 32:7 40:5 45:2 61:7 69:1  
 72:17 73:20 108:6 125:5  
 144:4 155:10  
**good (24)** 1:5,7,8 36:5 38:15  
 62:7 63:12 82:4,5 124:17  
 128:2 129:19 131:23  
 145:15 152:12 161:19  
 162:15 164:2 165:14  
 184:10,19,21 188:5 191:16  
**grammar (1)** 113:7  
**grande (6)** 104:7  
**hard (1)** 180:3  
**grateful (5)** 76:15 107:4  
 137:20 162:17 164:9  
**graney (37)** 1:5 6:4,20 7:7  
 24:17 30:3,10,18 47:5 72:2  
 76:12,15 108:10  
 116:10,16,23,24 123:7  
 125:12,13 127:23  
 128:2,5,23 130:17  
 131:10,22 132:2,7,13  
 147:12 157:11 158:9  
 159:10 162:7,12 219:8  
**great (5)** 42:8 96:8 107:3  
 163:19 217:14  
**greater (14)** 27:21 76:19,21  
 77:3 78:1,7 79:13  
 120:13,24 164:16,18 165:5  
 171:5 189:1  
**greatest (1)** 50:14  
**grip (1)** 132:11  
**ground (20)** 13:11 16:25

36:6,8,12 37:9,20 39:15  
 43:13 44:19 54:22 55:2  
 57:21 58:19 66:18 77:9  
 149:9 150:10 153:6,21  
**groundassigned (2)** 54:20  
 154:2  
**group (23)** 64:14 78:11,12  
 143:12,15 175:6 182:22  
 212:4,5,8,11  
 213:1,1,10,10,11,14  
 214:7,11 215:19,19,23  
 216:8  
**groups (5)** 78:15,21 79:25  
 174:24 215:4  
**guarantee (1)** 71:15  
**guidance (5)** 61:20 76:8 82:2  
 125:6 142:14  
**guide (1)** 185:15  
**gun (2)** 48:22 103:2  
**gunman (13)** 48:5,7,16  
 49:5,6 53:16 61:3,8,17  
 62:6,8,18,19  
**guns (1)** 8:19  
**gunshot (3)** 7:4 61:11 140:10  
**gunshots (5)** 9:22,23 10:19  
 24:24 48:22  
**guru (1)** 81:25

---

**H**

**hadnt (13)** 10:13 20:10 40:7  
 72:10 95:22,24 96:10  
 124:22 130:3 156:14  
 160:19 176:1 210:11  
**hailling (11)** 211:24  
 212:3,5,11 213:1,1,9,10  
 215:19,19,22  
**half (6)** 47:11 51:2 120:15  
 126:16,17 127:12  
**halfway (1)** 36:15  
**hall (1)** 165:11  
**hand (6)** 25:15 109:14  
 141:15 160:16 188:11  
 214:18  
**handed (2)** 46:15,23  
**handheld (1)** 115:19  
**handing (1)** 154:25  
**handled (2)** 97:21,22  
**handlers (3)** 80:20 84:14,17  
**handling (1)** 84:21  
**handover (2)** 46:21 154:17  
**hands (1)** 131:19  
**happen (21)** 14:10 29:10,25  
 47:15 55:6,6 56:4,5,9,18  
 57:12 60:1 63:5  
 64:16,17,20 66:6 67:20  
 68:13 88:2 188:20  
**happened (18)** 3:11,13,16  
 13:22 14:13 18:16 20:7  
 24:9 25:9 39:8 42:21 46:22  
 52:25 94:7 98:11 111:18  
 124:2 163:12  
**happening (18)** 2:23 8:7  
 11:11 17:23 18:7 19:12  
 35:22 37:14 55:25 60:15  
 85:4 97:17 100:1 126:15  
 140:18,23 146:12 190:7  
**happens (5)** 23:22 69:14,17  
 126:6 152:18  
**happy (3)** 37:8 116:15 192:7  
**hard (1)** 180:3  
**hardest (1)** 1:25  
**harm (2)** 75:13 92:10  
**hart (7)** 71:19  
 149:5,19,22,24,24 150:1  
**hasnt (1)** 56:15  
**havent (11)** 30:20 97:23  
 103:22 108:11 115:15  
 123:19,24 124:15 143:11  
 180:1 182:22  
**having (32)** 3:24 7:13 19:10  
 24:9 25:21 31:1 32:5 77:5  
 105:20 113:3,23 115:1  
 118:21 120:12 134:5 144:4  
 161:20 165:24 166:19  
 167:22 171:4 172:10 179:4  
 181:2 187:2,3 189:20

horwell (7) 137:9 215:3,13  
216:21 217:4,8,15  
hospital (4) 155:2,16,21,21  
hour (17) 62:21 143:21,25  
147:12 154:9,20 162:3,6  
179:14,17,19,22 181:3  
208:17,20,22,23  
hours (7) 81:5 94:12,20 96:3  
124:15 154:21 165:13  
house (1) 173:5  
housed (2) 78:3 80:13  
however (16) 5:2 17:2,20  
20:8 28:1 31:9 38:24 42:11  
74:3 87:13,22 98:18  
120:22 129:4 134:5 175:1  
hq (5) 178:4 183:9,13,19  
204:3  
hub (1) 80:14  
huge (1) 188:21  
huges (1) 172:10  
hundreds (1) 77:6

I

ian (12) 75:24 84:3 129:3,24  
152:10,14 158:23 159:3  
164:4,11 195:4 219:11  
ibis (2) 56:24 58:6  
iccs (1) 183:2  
iconic (2) 138:6 139:18  
id (29) 5:7 9:5 11:23 15:18  
17:3 18:15,19 20:21 35:7  
36:3 40:16,22,23 87:17  
89:21 94:8 114:15,18  
117:19 122:25 123:7  
124:22 125:5 152:14  
154:15 155:8 170:4 200:2  
207:4  
idea (10) 10:18 18:5 38:16  
82:4,5 112:2,18 128:3  
170:18 184:21  
ideally (10) 4:25 15:21 17:17  
20:7 55:7,8 59:2,4 129:7  
158:23  
identification (4) 59:18  
138:19,20 139:2  
identified (16) 43:16 56:9  
96:19 122:2,4 124:7,22  
128:14 140:4 173:1  
177:21,24 178:23 182:22  
189:20 203:1  
identifiers (1) 116:6  
identify (10) 54:13 58:15  
68:16 115:21,22 127:12  
170:6 189:2 191:12 203:11  
identifiyassess (1) 75:12  
identifying (3) 65:12 66:3  
173:19  
ideological (1) 138:10  
ie (1) 17:7  
ill (14) 1:23 6:1 20:13 36:15  
101:4 106:11 129:10  
133:13 143:5 157:10  
158:10 193:13 197:15  
214:25  
ilo (1) 50:23  
im (167) 1:22 5:15 6:2 7:6  
8:8 11:12 12:17 16:2  
19:1,4,7,8,15 23:2,10 24:1  
26:18,19,22 27:18,20  
28:16,16 29:6,12 30:3,6,10  
31:25 33:25 34:6,21,25,25  
35:11,14,15,16,17,18,25  
36:25 37:15,21 39:8  
42:2,5,13,19 46:3 47:5  
60:13 61:12 63:13 67:8  
71:13 72:12,17 73:5  
76:14,25 79:9,11 85:8,10  
86:4,7,14,14 89:14,16,21  
90:20 92:7,23 95:13 96:2  
97:10 98:3 99:20  
101:9,9,11 103:21,24,24  
104:19,21,25 106:1  
107:4,8 108:10,16  
111:11,25 112:11 113:18  
118:2,24 120:3,5 123:22  
125:19 127:25 130:9,17

131:17,18 132:10 133:9  
134:6 135:9 137:18,18  
140:12,12 141:12  
142:12,18 146:9 147:16  
151:15,20,23 152:10 155:8  
159:4 161:11 162:2,3,23  
164:9 166:13,24 168:7  
171:4 174:20 180:3,3,5,7  
181:16 184:18 185:24  
188:19 189:9,11,12  
192:3,4 199:19 200:8,10  
201:3,16 209:5,16 213:15  
214:25 215:1 216:18,21,24  
217:18  
imagine (1) 26:23  
immediate (11) 18:16  
24:16,21 56:6 71:10 83:8  
136:2 143:19 145:8 147:24  
160:10  
immediately (10) 7:23 20:24  
35:6,7 79:4 88:24 117:19  
135:25 160:16 175:24  
impact (2) 104:15 109:11  
impeccable (1) 98:4  
implementation (1) 109:24  
implications (6) 89:23  
90:1,3,7 117:21 130:6  
importance (3) 51:3 165:21  
166:13  
important (19) 4:1 28:4  
31:21,22 41:2,4 45:15 60:1  
66:4 73:13 82:6 106:21  
127:21 133:1 168:2 179:18  
181:21 189:8 202:6  
impossible (2) 4:11 15:24  
impression (3) 99:23 121:1  
155:8  
impressive (1) 97:20  
improvised (4) 138:9 139:24  
141:17,24  
imu (2) 169:4,7  
inaccurate (2) 70:1 134:4  
incident (133) 2:17,17 4:22  
8:22 9:13 11:24 12:13  
14:11 15:6 17:9,10,17 21:1  
24:25 26:25 29:9 31:13  
32:2,6 33:20 38:22 39:5  
44:20 46:25 47:15  
50:18,22 51:4,6,12,13  
52:13,15,20,21,25  
53:6,10,19 56:7,20  
58:2,3,24 63:6,9,22 64:1  
67:2 84:19 86:19,22  
87:6,11,14,18 88:4,8 98:21  
101:1,6,8,14,23  
102:9,10,24  
109:8,10,17,23 120:19  
124:24 129:5 136:2,15  
137:25 138:25 144:14,17  
145:7,19,22,22,25  
146:7,13,16 150:23  
154:15,16 158:13 160:15  
161:7,10 167:23 168:12,16  
169:19 171:5,15 172:20,22  
173:7 174:2 175:2,19,20  
176:17,18 177:3 179:20  
183:5,22 184:13,15  
185:8,12,20 186:5,13  
187:11 188:8 189:22  
194:20 199:2 202:23 206:4  
207:10,14 209:10,13  
210:14  
incidents (20) 8:23 9:2 43:11  
81:23 97:23 98:2  
109:18,20 110:21,22  
136:14,21 137:11  
149:19,25 151:9 154:12  
168:2 179:18 211:6  
include (6) 44:25 138:2  
141:5 154:3 182:6 211:10  
included (5) 15:14 49:9 54:5  
78:10 169:4  
includes (2) 173:7 181:1  
including (2) 78:22 147:20  
increase (2) 8:23 83:25  
increased (5) 12:11 35:4

45:22 78:20 79:24  
increasing (2) 36:20,21  
indefinitely (1) 150:8  
indepth (1) 146:15  
indicate (11) 31:20 94:13  
129:23 138:14 192:21  
193:20 194:11 195:22  
198:1 204:2,19  
indicated (10) 8:17 104:6  
121:17 132:7,14 143:11  
164:7 173:17 176:12  
215:15  
indicates (2) 59:19 172:7  
indicating (2) 188:11,15  
indication (2) 140:19 210:24  
indications (3) 138:2 140:22  
141:5  
indicators (4) 138:19,21  
139:2 140:9  
indiscriminate (2) 138:3  
139:11  
individual (2) 86:22 97:15  
individuals (5) 75:14 84:6  
94:1 111:12 160:13  
ineffective (4) 86:17,18  
87:9,11  
inevitable (2) 145:16 150:18  
inevitably (3) 10:20 49:13  
54:8  
infinite (1) 218:1  
influx (1) 99:2  
inform (6) 31:11 70:2 98:19  
102:23 152:1 195:20  
informal (1) 143:12  
information (44) 7:2,3,8,13  
8:17 10:1,16 11:8,11 13:10  
20:16 30:19 45:11,24 48:4  
49:3,19 51:7 53:5 56:8  
59:7 62:7 67:23 68:5 70:24  
78:12 79:6 87:23 95:5,14  
96:10,17 98:15 99:2 133:8  
139:4 152:22 153:5 155:1  
169:8 173:9,11 181:13  
211:14  
informing (7) 17:2 30:23  
46:20,22 71:3 200:2,3  
informing (2) 128:23 190:1  
infrastructure (3) 10:4 53:22  
150:2  
initial (16) 5:2 8:21 12:3,22  
35:25 43:16 51:6,16 52:6  
98:18 134:16 143:24 145:6  
150:11 154:8 174:2  
initially (8) 7:20 9:8 39:13  
51:11,13 54:25 84:3,13  
initiate (1) 69:24  
initiated (3) 74:22 102:9  
105:4  
initiative (2) 44:4 190:17  
injured (6) 91:22 92:3  
155:22,22 193:25 195:20  
injuries (5) 10:5 48:22  
147:25 148:9 149:16  
injury (3) 135:3 147:20 148:6  
input (1) 184:11  
inputs (2) 23:13,21  
inq007811 (1) 158:8  
inq007812 (1) 158:14  
inq007901 (1) 121:13  
inq007905 (1) 121:19  
inq0072791 (1) 172:3  
inq00727918 (1) 172:25  
inq00727923 (1) 51:1  
inq00727925 (1) 173:15  
inq00727935 (1) 144:15  
inq00727957 (1) 173:24  
inq00727960 (1) 174:22  
inq00727973 (1) 52:3  
inq00727974 (1) 53:24  
inq00727975 (1) 54:11  
inq00727976 (1) 175:13  
inq00727978 (1) 56:23  
inq00727979 (1) 59:5  
inq00727982 (2) 176:9  
180:25  
inq00727983 (1) 180:13

inq00727984 (1) 180:19  
inq00837210 (1) 63:15  
inq00837214 (1) 67:25  
inq00837215 (1) 66:9  
inq0083726 (1) 47:10  
inq0083729 (1) 63:2  
inq0166885 (3) 137:15 139:7  
140:14  
inq0166886 (3) 138:8  
139:9,24  
inq0188391 (1) 128:5  
inq0188391e11 (1) 128:8  
inq0188398 (1) 195:2  
inq0188399 (1) 195:18  
inq0235234 (1) 34:9  
inq023523435 (1) 36:16  
inq023523436 (1) 36:24  
inq023523441 (1) 100:20  
inq023523453 (1) 81:8  
inq023523454 (1) 81:15  
inq023523455 (1) 82:10  
inq023523470 (2) 106:15  
107:13  
inq023523474 (1) 115:6  
inq0243251 (1) 126:2  
inq02432511 (1) 151:22  
inq02432515 (1) 90:23  
inq0243252 (1) 126:8  
inq0243253 (1) 126:14  
inq02432538 (2) 91:14 95:1  
inq02432554 (2) 143:10  
144:1  
inq024351 (1) 101:16  
inq0243512 (1) 101:17  
inq0243513 (1) 101:17  
inq0243514 (1) 101:18  
inq0243515 (3) 94:21 101:18  
102:4  
inq0243516 (1) 101:19  
inq02435238 (1) 92:9  
inq0243535 (1) 101:19  
inq0243538 (2) 94:15 96:7  
inq024354 (1) 101:16  
inq0290213 (1) 105:1  
inq0291751 (1) 75:3  
inq0291752 (1) 75:9  
inq0411681 (1) 120:4  
inq0411682 (1) 120:14  
inq0412271 (1) 212:2  
inquiries (4) 133:2 134:20,24  
135:2  
inquiry (26) 23:4 34:5 41:2  
72:7 73:15 105:15  
106:10,21 107:4 108:13,19  
110:18 128:21  
132:14,16,25 141:8 147:15  
152:1,5 155:11 168:20  
172:9 179:13 218:5  
inside (1) 208:22  
insight (1) 209:16  
insofar (1) 159:10  
inspector (41) 1:3,9 13:21  
29:7 37:23 43:16 44:4  
46:11,20 47:3 56:8,12  
72:14,20 109:15,15 110:25  
116:25 128:23 131:10  
132:10 133:10,15 141:15  
146:2 149:15 153:11  
155:11 157:2 160:18  
170:16 176:12,13  
187:25,25 195:19 197:5  
200:22 202:1 210:24 219:3  
inspectors (1) 116:20  
instances (1) 99:9  
instead (5) 12:24 118:6  
131:24 201:1,15  
instigate (1) 64:9  
instigated (2) 23:6 83:22  
instruction (3) 190:12  
214:13 216:3  
integral (1) 124:6  
intellectual (1) 45:18  
intelligence (5) 45:21 98:15  
142:20 155:12 173:7  
intelligent (1) 112:5  
intend (2) 25:17 70:5

intense (1) 209:10  
intention (3) 6:12 150:11  
180:8  
interested (1) 151:23  
interests (2) 132:8 208:10  
interoperability (3) 56:25  
174:24 175:6  
interpreting (1) 140:21  
interrupt (2) 5:13 93:2  
intervene (1) 30:14  
intervention (1) 145:8  
interview (6) 38:6 40:5 81:7  
106:14 107:22 119:12  
interviewed (1) 122:2  
into (51) 3:16 15:15 16:2,23  
19:11 21:18 22:20 25:7,9  
30:3 37:3 41:14 46:3 68:4  
69:5 70:5 72:6 73:7,22  
75:4 79:4 84:13 88:18  
90:25 92:8 93:12 95:22  
97:17 104:20 105:15  
111:11,19 119:16 127:11  
149:2,12 150:1 161:14  
164:6 166:15 167:13 186:9  
194:15,19 195:3,18 197:3  
202:21 206:18 207:24  
209:14  
intricacies (2) 57:3 103:13  
intrinsic (1) 145:21  
introduction (2) 81:11  
109:14  
inundated (2) 189:23 191:4  
inventory (1) 114:22  
investigated (1) 30:12  
invite (1) 171:4  
invited (3) 23:18,20 171:20  
inviting (1) 217:4  
involve (2) 23:22 88:8  
involved (19) 22:3 28:24  
48:5 53:16 54:6,9 59:16  
106:1 111:16 154:15  
157:14 161:7,8 166:18  
177:2 184:3 207:17  
209:9,13  
involvement (2) 76:2 104:14  
involves (1) 68:10  
involving (3) 32:3 48:2  
108:15  
isnt (25) 3:12 4:1 9:17  
10:15,20 20:2 38:2 44:6,15  
52:22 55:24 57:2 64:18  
73:13,16 85:18 93:3  
121:23 123:18,25 148:8  
152:12 153:9 155:4 173:14  
issues (4) 61:22 129:10  
161:17 162:24  
itd (1) 156:15  
item (1) 159:16  
itfc (17) 16:9 21:6  
31:2,15,15 33:17,22 53:2,2  
87:19 88:13 135:10,24  
136:14 152:25 154:12  
155:5  
itfrelated (1) 153:2  
itfcs (1) 23:12  
itil (3) 90:15 186:10 188:14  
its (173) 6:11 7:25 8:4 10:10  
12:16 18:24 19:1,12 23:23  
25:7,9,18 26:13 27:15  
28:4,22,25 30:5,13 31:9  
33:10 34:5,7,13 36:1 38:21  
39:9,14 45:15 47:10 48:7  
49:11 51:2 52:24 53:5,21  
114:9,13,20,25 115:4  
54:11,19 55:23 56:2  
58:13,14,24 59:15,25 60:3  
61:5,15,21,24 62:1,2,13  
63:1 64:15 66:22,24 70:25  
73:15 74:8,21 76:15  
77:7,7,8,11 80:19 81:10,16  
82:6 83:21 85:8,18  
88:16,18 89:8,19,19  
90:11,21,23,24 91:7 93:14  
97:2,5,6 99:3,6 100:13,23  
102:14,19 103:7 104:4  
109:1,3,7,10 195:23  
196:2,14,17,19,21  
197:1,10,13 199:17,19

118:10 122:19,22  
123:12,17,19 124:1,17  
125:10 127:2,10,21 128:17  
130:4,5 133:20 138:19  
139:6,10 140:13,23  
141:1,7,10,25 142:9  
144:5,24 149:20 150:19  
152:23 153:5 155:19  
156:17 159:9 161:6 163:2  
169:18,21 170:6 171:12,24  
172:2 176:5,11,19 177:18  
178:12,20 181:21,23 182:4  
185:7,9,24 189:8 191:6  
192:7 195:4 200:11 210:2  
213:2,11 215:6,7,8 217:18  
itself (19) 61:20,23 62:2 65:7  
86:21 91:2 94:14,23 95:23  
96:4 102:3 113:24 160:10  
161:8 168:6 176:18 185:12  
206:5 211:8  
ive (44) 11:9 16:14 20:8  
23:24 24:4 28:13 30:8  
31:10,11,23 38:10 41:20  
52:18 53:1 54:24 57:15  
67:10 70:5 80:18 82:1  
83:21 86:3 90:5 92:4  
98:17,18,20 103:3 112:17  
113:7 125:1,7,10 134:6  
149:21,21 152:14 160:24  
161:17 171:19 177:20  
181:5,16 205:22

J

James (2) 164:11 205:22  
January (3) 23:7 122:3  
165:11  
jeanette (3) 191:13,15 196:4  
jesip (42) 23:6 24:10 29:3,5  
32:20 34:15 19:20  
36:18,21 37:2 38:15 39:3,8  
41:13 47:18 57:16  
86:7,10,11 87:20,23  
88:14,20 89:2 109:23  
110:11 147:13 154:1  
156:10 158:5 161:15  
165:6,8,15,19,21  
166:4,5,12,19 215:15  
job (14) 14:25 16:4 39:9  
51:22,24 59:22,23,25  
69:18 85:25 115:21 164:12  
189:6 206:5  
jobs (6) 54:16 69:22 79:2,4  
169:9 199:17  
jog (1) 26:5  
jogged (1) 27:12  
john (176) 5:12,15,25  
18:1,23 19:1 20:3 25:4,13  
26:2 27:1,14 28:22 29:6,23  
30:5,13 31:20 32:4  
33:3,12,15 38:14  
39:7,18,20 41:17 42:13,22  
43:1 45:15 46:7 47:4  
55:11,15,19 60:5,13,25  
61:5,7,12,15 62:4,10,21,25  
67:8,14,21 72:1 73:20  
74:12 76:23 77:1 86:3,5  
88:14 89:12 90:9,17  
91:5,10,12 96:22 97:8,12  
105:8 106:6,12,16,20  
107:3,8 108:20,23  
109:1,6,25 110:3,8  
111:3,18 112:16,24  
114:9,13,20,25 115:4  
116:9,14,22 121:10 122:19  
123:13 124:1,4,11 125:12  
126:10 127:20,25 128:4  
130:14 131:12,21 132:1,3  
133:9,13,20 134:1,10  
137:17,22 139:6 140:12  
141:1,13 157:1,5,9 158:21  
162:1,9 163:1 164:1,9  
178:6,8,10,16 180:1  
187:9,13 188:15 189:5  
191:3,7,10 195:23  
196:2,14,17,19,21  
197:1,10,13 199:17,19

200:4,15 205:10,15,18  
206:7,9,11,14,16 209:23  
211:18,20,22 213:5  
214:1,20 215:11 216:20  
217:6,10,16,22,24  
join (2) 164:21,23  
joint (4) 39:4 43:23 47:12  
68:1  
jointly (1) 68:8  
jolly (1) 38:15  
jops (13) 10:23 20:1  
28:10,17 29:5 47:9 57:11  
63:1,4 137:10 144:12  
149:10,11  
jot (1) 114:17  
journey (1) 208:21  
July (4) 119:21 120:3,5  
121:11  
justified (2) 4:8 105:24  
justify (2) 62:3 130:9  
juxtaposition (1) 92:16

K

keep (2) 216:24 217:17  
keep (18) 4:11 13:17 16:8  
17:20,22 40:23 43:1 79:12  
116:15 118:15 119:12,23  
120:8 122:6 129:12,23  
130:3,13  
keeping (2) 129:1,19  
kept (3) 37:12 121:24 158:23  
kerslake (25) 34:4 38:7  
40:4,9,17,20 41:2 81:7  
82:22 100:16 106:13,18,22  
107:6,8,21 115:5 119:11  
122:3 124:14,16 132:16,25  
133:3 134:6  
kev (1) 144:6  
kevin (1) 144:10  
key (7) 37:5 39:3 44:9 81:21  
83:7 186:8 207:16  
kind (12) 2:19 16:7,21 55:23  
56:25 64:4 88:19,20  
105:25 147:5 149:22 154:1  
kindly (1) 54:15  
kingdom (1) 160:14  
kit (1) 8:11  
kneejerk (4) 7:10 9:2,15  
62:14  
knew (40) 4:10,11 14:7  
15:18,20 18:14,17 34:1,3  
36:4,7 37:4,6,7,9,16 41:12  
49:11,12 60:15 64:24  
65:3,24 70:3 72:17 79:2,3  
90:6 102:19,21 113:14  
122:9 123:2 129:16 151:2  
158:25,25 166:25 198:2  
211:7  
knife (2) 138:15 142:2  
know (94) 2:9 6:20 9:12  
16:13 25:8,11 28:25 29:12  
36:9,10,18 37:13,17 38:5  
39:2,19 40:2,19 52:21  
57:3 59:16 61:7,8,15 62:13  
73:20 80:19 82:3,7 91:6  
95:6 97:14 102:17,18  
106:21 107:17 108:7,13  
109:2 112:4,14 113:10  
115:24 116:2,25 117:4  
118:10,14 119:1,22  
126:18,24 127:13  
130:14,16 131:22  
135:10,12 137:7,23  
140:8 143:17 146:22 157:1  
159:8 161:4 166:21  
181:11,12,

known (15) 37:10 40:18  
78:11 80:15 81:24  
87:15,17,18 124:5 131:3  
154:20 172:2 186:13,16  
214:15  
knowns (1) 55:20

---

**L**

la (34) 127:10,20,25 162:12  
164:2,5,6,10 178:17 180:3  
187:15 188:16 189:8  
191:11 196:1,4 197:2,14  
199:22 200:5,17 205:19  
206:17 210:5 211:21,23  
213:7 214:4,25 215:12  
216:17 217:21,23 219:12  
labelled (1) 212:3  
labour (1) 183:17  
lack (1) 160:21  
lacked (1) 33:19  
ladybridge (1) 165:11  
laid (1) 114:9  
language (2) 137:12 158:5  
large (2) 51:5 182:4  
largest (1) 144:19  
last (10) 14:8,9 36:24 77:25  
80:10 106:13 115:13 118:3  
124:15 203:4  
late (1) 216:14  
later (6) 30:6 59:18 91:19  
114:20 120:3 134:14  
latter (1) 176:14  
laura (3) 197:20,22 216:7  
lawton (1) 136:6  
layout (1) 108:8  
lead (5) 63:22 64:2 68:1  
90:15 197:23  
leader (2) 105:2 110:25  
leadership (5) 80:13 104:22  
106:2 110:23 202:19  
leading (1) 95:12  
leaps (1) 108:6  
learn (1) 124:5  
learned (3) 74:22 92:17  
124:25  
learnings (1) 60:8  
least (11) 62:7,17 99:20  
129:22 140:1 145:1 151:11  
184:2,14 201:3,16  
leave (13) 2:1 13:7 37:8  
58:11,18,25 108:12 143:5  
177:14 201:24 208:25  
209:18,21  
leaving (1) 203:6  
led (2) 4:16 68:9  
left (2) 175:11 207:3  
lefthand (3) 173:15 180:11  
198:24  
legitimately (1) 150:17  
length (2) 156:8 158:1  
lengthy (1) 34:5  
less (11) 7:2 9:21,23 41:11  
107:22 117:11 137:5  
138:12,22 158:9 217:12  
lesson (1) 124:6  
lessons (3) 74:21 124:4,25  
let (3) 37:13 76:9 111:3  
lethal (1) 14:19  
lets (8) 18:1 21:2 61:12 72:5  
131:12 173:4 174:1 180:4  
level (20) 71:13 81:25 94:9  
95:15 104:21 105:2,15  
135:3 136:12,25 142:1  
147:10 158:15 159:2  
162:17 165:15,16,17  
176:25 214:8  
levels (6) 75:13,16 104:3,4  
105:23 159:4  
lewis (3) 197:20,22 216:7  
liaise (3) 50:11 51:20 81:1  
liaising (1) 35:4  
liaison (1) 51:21  
lie (1) 123:14  
life (6) 6:12 86:21 87:2  
90:15 99:11 135:3  
light (2) 41:1 130:5

lightly (1) 112:8  
lights (1) 184:24  
like (30) 16:23 23:19 24:6  
31:5 37:3 74:25 75:5 79:3  
81:14 82:23 85:2,23 87:13  
93:20 94:2 126:13 128:2  
131:16 143:24 151:25  
156:3 159:5 161:13 170:4  
176:8 188:11 190:7 207:4  
215:22 216:12  
likelihood (1) 75:11  
likely (2) 46:1 67:5  
likewise (1) 115:25  
limit (2) 40:6 67:11  
limitations (1) 157:22  
limited (8) 101:7,25 120:22  
122:20 137:11 138:21  
161:18 213:22  
limiting (1) 157:14  
limits (2) 40:2 121:4  
line (14) 19:6 29:5 32:20  
64:11 73:24 126:13 132:12  
140:6 150:16,19 169:3,8  
200:20 217:6  
linear (1) 87:10  
lines (2) 89:20 151:4  
link (3) 1:5 64:10 176:23  
linked (5) 104:1 105:20  
110:9 155:19 173:7  
list (27) 19:13,13 23:11  
31:13 52:5,11 54:1 158:15  
175:16 179:24 180:8  
181:1,2,5,11,12,13 195:9  
196:16,17 197:9,10,19  
199:14,14 210:10 215:3  
151:25 189:1  
listened (2) 2:24 107:1  
listening (13) 5:4  
35:2,15,16,17,18 58:24  
135:1 151:19 152:9,25  
163:3 188:19  
literally (4) 114:7 141:14  
210:2 213:5  
little (12) 50:13 72:4 73:25  
74:19 76:2 91:1 92:7  
107:20 109:8 120:3 126:19  
166:24  
live (1) 162:21  
lives (1) 92:18  
local (5) 1:13 8:6 44:11  
77:7,11  
locally (3) 76:20 80:25 85:24  
locate (2) 16:6 204:17  
located (5) 77:24 79:13,18  
80:25 207:7  
location (27) 15:21 44:10,10  
69:2,2 76:14 77:17 83:11  
90:8 92:6,24 93:10,13,22  
96:12 109:12 115:25  
145:15,15,16 155:24  
159:23 170:6,7,9 206:24  
210:17  
locations (3) 65:25 77:21  
206:25  
loe (2) 66:15,24  
log (7) 4:12 48:23 190:22  
203:20 211:8,8,9  
loggist (1) 114:16  
logic (1) 10:8  
logical (1) 30:8  
logically (2) 42:1 141:17  
logs (1) 169:13  
long (11) 20:3 23:13 42:22  
104:6 131:16 135:23 163:2  
170:12 203:17 217:24,25  
longer (4) 18:9 29:8 116:17  
149:20  
longwinded (1) 60:9  
look (36) 23:24 24:6 42:1  
51:1 54:19 63:11 77:15  
81:14 89:19 121:18  
134:10,12 144:1 151:25  
166:24 172:21 173:14  
174:1,21 176:8 179:4

180:8,11 181:2 187:16,19  
188:17 194:10,12 197:16  
199:6 202:6,25 203:21  
209:7 215:6  
looked (8) 24:4 100:24 113:1  
117:4 126:1 127:11 161:5  
197:4  
looking (29) 3:16 4:19  
10:8,11 19:6 21:21 29:3  
38:8,21 52:20 63:3 89:18  
99:22,24 100:23 115:20  
124:4 128:7 129:16 141:3  
144:25 152:6 172:6 174:19  
179:24 200:8,11 206:4  
216:13  
looks (4) 42:25 138:18  
142:11 161:12  
loop (1) 13:7  
lopez (22) 34:9 51:1 52:3  
53:23 54:12 63:1 82:10  
94:25 107:13 127:18  
128:6,17 144:2 151:18  
158:14 172:3,25  
180:5,20,25 181:19 195:1  
loss (5) 6:12 86:21 87:2  
90:15 135:3  
lost (1) 41:20  
lot (20) 16:11,14 23:21 24:2  
42:20 63:8 85:9 86:6 97:12  
103:24 107:16,23 109:13  
113:21 157:18 163:5,6  
188:22 193:20 206:1  
lots (3) 60:20 72:5 121:15  
loved (1) 59:14  
low (1) 75:12  
lower (2) 126:19 195:3  
lowlevel (3) 105:14,19 106:4  
lrf (1) 34:11  
lunch (5) 116:21 131:24  
162:2,4 163:24  
lying (1) 123:9

---

**M**

maam (3) 195:4 196:25  
205:2  
machines (1) 183:2  
mad (1) 195:16  
main (4) 3:1 44:24 83:17  
102:24  
mainly (2) 21:21 168:4  
maintain (1) 155:25  
maintained (4) 64:12 118:20  
125:8 175:20  
maintaining (3) 142:24,25  
143:1  
major (38) 14:11 31:12 32:2  
33:20 44:20 47:15 50:22  
51:4,6,13  
52:13,15,20,21,25 53:6,10  
63:9 110:21 144:14  
145:19,22 146:7,13,16  
151:9 154:11,15 160:14,15  
161:7,10 171:5,15  
172:20,22 174:2 176:17  
majorcritical (1) 51:12  
majority (4) 81:4 102:17  
125:3,24  
makes (5) 20:24 42:4 47:12  
77:18 83:10  
making (25) 3:14 5:10 33:7  
35:14 37:12 41:12 50:17  
56:2 61:24 73:14 93:6,8,16  
97:4 98:13 117:11,24  
129:11 130:23 190:3,15  
206:3,3,5,6  
male (3) 95:6,17,18  
man (5) 73:12 97:25 98:7  
112:5,7  
manage (10) 75:12 94:6  
109:18,20 113:23 134:7  
162:3 173:6 175:1 177:11  
managed (3) 24:4 32:22  
113:25  
management (7) 52:25  
78:13 80:16 81:22 162:24  
169:8 175:2

manager (16) 79:18  
109:18,23 167:13,14,24  
168:12,16 176:10  
177:11,16 181:8 182:19  
197:24 202:20 210:12  
managers (1) 78:6  
managing (3) 40:6 113:20,21  
manchester (24) 27:21  
76:16,19,22 77:4 78:1,7  
79:13 120:13,24 139:15  
161:12 164:16,18 165:5  
168:6 170:7 171:5 187:21  
188:8 189:1 190:4,15  
193:18  
mandatory (1) 23:14  
manner (1) 138:15  
manteline (2) 120:2,17  
many (15) 23:19,20 42:11  
47:14 51:19,20 63:12  
69:23 103:4 114:22 126:1  
145:4,4 159:23 191:9  
mapping (4) 115:8,10,16,17  
marauding (14) 8:19 100:17  
101:7,25 102:21 103:1,15  
140:17,19 141:18 142:9,13  
155:25 156:14  
march (3) 21:18 172:13,13  
mark (1) 37:19  
mars (1) 135:16  
mass (5) 138:4 139:11  
145:2,7 147:6  
matches (1) 168:4  
material (2) 38:8 155:4  
matter (19) 14:22 16:3  
28:20 34:10 54:2 57:20  
87:16 88:21 95:20 97:10  
101:14,22 104:9 110:15  
113:18,19 115:7 141:8  
188:13  
matters (8) 84:21 86:9  
89:15,16 100:11 119:3  
154:1,3  
maximum (1) 6:12  
may2017 (1) 160:12  
maybe (9) 26:4 41:20,20,21  
61:17 83:16 86:8 91:10  
150:20  
mcmurdo (5) 191:13,15  
192:5,18 196:4  
mean (19) 13:24 16:21 34:15  
51:13 86:25 93:2 100:18  
112:1,13,25 113:9 115:24  
126:18,25 141:13,21  
201:4,17 213:5  
meaningful (2) 88:20 106:23  
means (4) 10:20 15:20 52:7  
94:20  
meant (16) 19:11 42:18  
202:18  
52:6,15 57:11 64:16,17,20  
67:18 87:24 107:14 112:19  
140:16 196:12 211:18  
215:10  
measures (3) 104:23 105:3,6  
medal (2) 72:22 74:10  
media (3) 126:13 173:8,9  
medical (6) 7:23 37:6 40:24  
93:15 145:8 148:6  
medium (1) 75:12  
meet (3) 11:7 68:7 69:7  
member (4) 34:11 164:19,23  
202:18  
members (11) 92:22,25  
93:1,4,9,14 169:3,4,22,23  
186:8  
memory (4) 26:5 27:12  
160:20 198:25  
mental (2) 80:18 181:21  
mention (12) 2:6  
40:11,12,21 101:24  
119:12,23 120:7,10 122:4  
162:13 206:15  
mentioned (10) 22:15 28:13  
40:20 81:5 83:21 92:25  
115:15 129:8 140:9 203:20  
mentioned (4) 12:9 66:6  
103:16 133:6

merely (1) 31:8  
merest (1) 121:23  
merseyside (1) 35:8  
message (5) 86:3 117:5  
143:25 144:4,11  
met (3) 139:3 140:1,11  
method (1) 210:3  
method (1) 161:20  
middle (2) 59:6 126:21  
midnight (1) 204:20  
might (39) 2:6 4:16 16:3,5  
18:9 33:8 34:18 45:25 55:2  
72:7 90:5 95:9 103:16  
107:20 124:5 141:2 173:13  
183:6 184:14,20,20  
186:19,23 187:4 191:4  
194:13,23 201:18 204:13  
205:23 207:7,24 208:7  
209:14,17,18 211:4,14  
218:1  
miles (1) 77:6  
mind (34) 5:12 11:25 13:15  
24:8 27:16 31:21 34:21  
42:11 53:19 60:21 91:5  
93:23 96:16 100:15 103:22  
104:1 106:20 137:19 145:6  
165:22 166:8,12,13,16  
172:1 181:1 192:10,15  
194:22 208:20,21 209:7  
216:13 217:7  
minimum (2) 78:16 79:21  
minute (1) 11:23  
minutes (26) 6:22 9:12,12  
12:8 20:17 49:12 53:4,17  
116:17 117:11 120:18  
131:19 132:1,2 147:17  
148:12 149:9,24 150:5  
162:21 170:14 203:18  
209:10,11 210:2,5  
misgivings (1) 110:11  
mislead (1) 133:20  
missed (3) 92:23 130:10,11  
missing (1) 179:19  
mistake (1) 133:7  
mistaken (2) 27:2,5  
mistakes (4) 99:6,9,10  
113:14  
misunderstand (1) 209:6  
misunderstood (1) 3:7  
mitigated (1) 68:17  
mmhm (2) 48:17 55:5  
mobile (1) 142:9  
mobilisation (1) 63:6  
mobilise (2) 19:24 35:6  
mobilised (1) 7:14  
mobilising (1) 6:17  
modestly (3) 217:21,22,23  
module (2) 159:8 197:24  
moment (29) 4:20 5:13 18:1  
19:9 52:2 60:12 72:5,18  
84:9 85:9,17 89:9 91:3  
94:12,24 96:5 99:13 101:5  
106:10 111:22 113:3  
130:8 161:22 164:12  
177:14 195:16 197:18  
209:5 216:20  
momentarily (1) 67:11  
moments (3) 85:12 87:10  
91:19  
monday (5) 80:22 162:25  
164:8 217:19 218:6  
money (1) 105:20  
monitor (4) 160:5 169:9  
175:6 190:22  
monitored (6) 174:25  
212:9,22 213:2,3 215:20  
monitoring (1) 58:17  
moore (2) 12:9 20:20  
more (47) 5:4 6:5 8:9 24:23  
30:19,21 41:19 42:4  
53:15,15 62:17 63:13  
69:17 72:4 74:19 77:11  
79:9 82:25 83:3 86:18  
87:20 91:10 93:12 95:5  
98:23 99:2,4 100:11  
102:10 106:1 107:22

109:13,21 132:24 136:13  
137:3,4 146:10 149:24,25  
158:9 160:9,16 166:24  
180:14 210:20,21  
moreover (1) 120:10  
morning (6) 1:5,7,8 122:24  
197:12,13  
most (22) 1:17,18 6:4 12:12  
38:23 43:10,13,19 62:12  
88:5 103:11 129:25  
133:4,7 139:23 143:2  
144:25 149:3,17 168:1  
178:1 212:2  
motion (1) 19:16  
motivations (1) 157:13  
move (11) 6:1 19:8 20:13  
21:2 23:3 27:17 106:11  
125:13 165:2 183:4 202:4  
moved (1) 77:10  
moving (5) 86:4 93:21 95:10  
109:23 174:19  
ms (2) 192:5,18  
mtfa (25) 1:13 11:6 47:13  
48:3,8,11 49:18 53:8 61:21  
63:8,17 66:21 100:19  
102:15,16,16,20 103:10  
137:9 138:2,21 139:3  
140:3 141:5,10  
mtfah (1) 12:13  
mtfay (49) 2:16 8:5,9,11,25  
12:20 16:12 18:13  
27:8,13,15 30:21 31:6  
37:25 38:4 39:22 42:4,25  
43:4 52:21 64:23 74:16  
77:15 99:4 100:17  
103:1,10 108:25 110:7  
111:1,20 116:17 129:6,14  
131:18 133:3 139:17  
143:23 146:10 156:5 160:9  
162:1 163:4,22 195:21  
210:21 215:13 217:16  
218:3  
multiagency (11) 27:18 31:6  
41:8 47:19,23 55:9 63:8  
212:11 214:7 215:4 216:8  
multiairwave (1) 121:22  
multiple (10) 6:23 7:13 9:20  
10:18 138:3 140:15 141:21  
144:22,22,23  
multistated (1) 141:22  
mumbai (3) 60:25 87:4,8  
murder (1) 179:19  
murderously (1) 86:23  
muscle (1) 160:20  
must (4) 29:15 60:21 66:11  
131:13  
myself (4) 25:19 50:23  
146:15 190:13

---

**N**

n (1) 219:1  
nail (1) 147:5  
name (3) 131:5 164:10 186:3  
named (1) 121:17  
namely (2) 133:14 166:4  
names (1) 121:15  
narrow (1) 143:7  
national (6) 1:12 35:2,10,15  
105:15 194:16  
nationally (1) 114:6  
natural (1) 18:6  
nature (5) 141:25 142:16  
145:21,24 148:8  
nawaz (18) 46:10,14,17  
145:25 184:7,17 193:12  
194:11 195:14 196:18  
198:18 199:13,22 200:6  
203:24 204:3 205:8,11  
ncalt (1) 165:12  
ndm (1) 22:22  
near (1) 47:7  
nearby (2) 71:15 77:18  
nearer (2) 39:16 113:12  
nearly (2) 27:20 41:13  
necessarily (10) 17:16 25:7  
39:9 42:2 51:10 67:8 79:2

97:4 141:1 142:16  
necessary (8) 44:8,21 77:10  
110:24 128:1 134:11  
154:24 198:3  
necessity (3) 23:12 138:23  
147:23  
neck (1) 210:3  
need (65) 1:21 7:25 22:17  
23:24 35:13 45:16 46:1  
47:19,23 49:1 50:1 56:12  
58:13,14,24 60:11 62:17  
63:5,11 64:5 65:2,14,22  
66:13,17 68:23 69:10 79:2  
82:11 91:16 92:1,13 94:16  
95:2 96:8 102:17 103:7  
104:18 114:6,22 115:5  
126:20 131:21 140:23  
143:15 144:13 148:6 149:7  
154:22 162:5,24 168:22,23  
174:24 185:1,3,16 186:16  
192:10 194:10,19 196:8  
197:3,16,17  
needed (21) 10:7 14:8,9  
17:22 60:2 64:24 65:15  
68:12,20 69:20 93:21  
102:18 106:23 144:16  
190:7,8,10 194:23 198:22  
212:17,20  
neednt (1) 153:23  
needs (6) 39:12 45:17 55:16  
69:5 169:12 209:8  
negotiate (1) 15:16  
neither (1) 19:5  
neutral (1) 72:18  
neutralise (2) 16:6,19  
neutrally (1) 160:12  
never (28) 4:21 5:8 18:19,20  
25:25 26:22 33:14 39:8,18  
43:23 44:2,2 46:22 62:15  
67:5 87:24 98:17 112:19  
122:17 150:15 151:2  
154:15 160:17 161:6,9,21  
181:5 183:21  
nevertheless (2) 7:3 9:22  
newtown (1) 119:19  
next (31) 36:15 53:23 56:9  
72:2 80:12 91:19 125:19  
144:12 145:19 146:19  
151:14 155:14 157:10  
158:14 162:18,20,25  
166:21 167:13 170:16  
172:13 173:14,24 180:19  
187:25 193:10 194:15,25  
196:4 198:10 214:4  
night (67) 2:9,13 3:16,19  
24:15 29:5 30:22 32:23  
33:8 40:23 43:9 46:4 51:24  
59:24 60:7 72:8,16,19  
73:18 74:14 80:4  
78:15 87:11 87:17 97:3  
98:11 100:1 110:6 113:24  
132:22 134:7 143:2 146:12  
154:16 159:12 163:13  
167:12 175:8 180:16  
183:12 184:4,9,12 185:18  
186:12 187:7 194:16  
195:12 196:23 197:10  
204:6,13 205:16 208:5,19  
209:2 211:4,10 212:4,13  
213:14 214:12 215:16  
216:24  
nilo (2) 36:13 43:13  
nine (2) 103:8,9  
nods (1) 215:1  
nominated (1) 145:10  
nonetheless (1) 100:3  
nonexistent (1) 44:1  
nonidentifiable (1) 173:8  
nonmtfa (1) 138:12  
normal (3) 14:11 31:12 43:19  
normally (7) 50:23 52:24  
97:25 123:14 146:8,8  
154:19  
north (3) 74:18 79:21 114:8  
northwest (1) 120:24  
note (3) 26:14 194:21 198:16

notes (1) 2:19  
**nothing** (6) 72:15 85:23  
 96:6,8 98:7 106:9  
**nothings** (1) 11:10  
**notifications** (1) 17:19  
**notify** (2) 20:9 195:7  
**notwithstanding** (1) 51:3  
**nowadays** (1) 137:17  
**nowin** (1) 124:21  
**number** (24) 25:22 28:13  
 35:12 39:24 45:2 48:21  
 54:3 59:13 61:22 63:11  
 78:13 94:1 112:24 116:11  
 132:11 134:19 135:7 136:9  
 139:3 141:18 148:17  
 150:24 193:24 207:16  
**numbers** (4) 54:2 149:1  
 191:7 211:8  
**numerous** (5) 93:8 102:7,8  
 130:23 131:2  
**nwas** (20) 7:23 8:4 36:6 37:5  
 38:5 40:13,14 50:2,14,15  
 51:21 57:1 64:1,5 65:24  
 122:9 123:21 134:6 145:3  
 150:15

---

**O**

---

**objective** (1) 159:11  
**objectively** (3) 129:16,17  
 157:17  
**obligation** (1) 53:25  
**obligations** (2) 51:16 118:22  
**observation** (2) 107:21 159:9  
**observed** (1) 141:7  
**obtain** (1) 151:11  
**obtained** (1) 173:11  
**obvious** (9) 2:20 9:2,3 44:21  
 77:7 95:21 145:15,21  
 171:10  
**obviously** (28) 4:19 10:2  
 12:11 27:3,15 37:11 43:13  
 44:9 45:16 75:2 82:25  
 96:19 110:10,19 130:11  
 131:13 136:17,20 140:8  
 144:11,21 150:1 152:14  
 179:17 184:11 216:24  
 217:10,12  
**ocb** (8) 75:4,5 76:11,14  
 77:16 78:16 167:15 202:18  
**ocbl** (1) 80:12  
**occasion** (6) 28:25 47:22  
 101:12,23 102:7 133:24  
**occasions** (4) 102:7,8 136:9  
 167:23  
**occupationally** (1) 136:17  
**occur** (1) 13:25  
**occurred** (3) 113:2 129:22  
 184:13  
**occurring** (1) 75:11  
**oclock** (4) 47:6,6 95:13  
 163:22  
**ocr** (24) 79:18,21,24 125:23  
 159:7 160:24 161:8  
 174:10,22,25 175:5 182:17  
 185:9 187:18,21 203:3  
 206:22 207:3,10 209:1  
 210:17,23 212:6 216:4  
**ofc** (7) 12:3 15:10 16:14,22  
 147:3 152:7 153:1  
**ofcs** (1) 156:19  
**offender** (2) 95:8 96:18  
**offenders** (1) 75:14  
**offer** (1) 83:19  
**office** (9) 81:5 126:10,10  
 129:5 152:19 197:6,19  
 199:10 200:1  
**officer** (37) 5:22 11:9 20:19  
 35:21 78:9 81:19,24  
 82:9,15,19,24 83:2  
 97:14,18 102:6,11 113:20  
 127:16 128:15 129:1,4,18  
 130:12,15,19 154:19  
 169:14,21 170:2,3,17  
 196:25 199:11 205:2  
 208:15,18 209:3

**officers** (31) 8:8,12 9:7 10:12  
 12:8 13:2,11,17,22 14:18  
 16:11 17:8,13 19:17,19  
 20:25 25:6,22 26:12 36:11  
 46:14 70:11 71:1 77:9  
 82:12 105:9 115:18 126:25  
 151:1 175:22 183:1  
**officially** (1) 159:17  
**often** (2) 169:18 214:2  
**ohare** (1) 121:10  
**okay** (32) 1:9 5:25 6:7 7:22  
 11:14 21:2 30:5 33:3,15  
 37:23 39:20 42:22 52:8  
 55:19 62:21 77:1 89:12  
 103:7 106:6 109:25 116:22  
 123:13 124:1 134:10  
 187:13 191:10 194:6  
 197:1,13 206:6,16 215:11  
**oldham** (4) 155:2,10,16,21  
**omission** (1) 123:19  
**omitted** (8) 123:25 132:18  
 133:4 134:19,23 135:2,5  
 138:10  
**omitting** (1) 132:25  
**oncall** (1) 46:10  
**once** (22) 11:2 16:13  
 25:15,23 35:7 36:19  
 37:1,19 41:12 57:14 60:15  
 61:7,15 64:16 125:9  
 143:21 146:11 152:13  
 153:24 157:4 160:25 204:4  
**onduy** (1) 198:14  
**onduy** (1) 165:10  
**ones** (11) 9:10 23:14,24 37:5  
 38:16 59:14 110:17 113:19  
 168:4,5 215:25  
**oneweek** (1) 21:6  
**ongoing** (12) 7:16 8:18 14:12  
 15:23 37:22 38:23 52:22  
 70:4 88:9 92:6 93:11 94:9  
**onsene** (4) 66:12 68:1,6  
 70:13  
**op** (14) 11:3,7,13 12:14  
 17:17 18:13,20 36:9 37:8  
 61:20 62:3,3 117:19 140:8  
**open** (5) 11:25 157:11 159:2  
 192:8,14  
**opened** (5) 175:15 181:25  
 182:5 192:11 194:6  
**opening** (3) 27:22 65:6  
 175:18  
**operated** (3) 76:11  
 183:11,13  
**operating** (2) 47:12 80:4  
**operation** (44) 18:3 19:5,10  
 21:24 34:15 38:5 60:17  
 61:18 66:8 75:5 88:12  
 89:22,25 90:3 100:17,25  
 111:13 117:1 119:19  
 120:2,17,18 127:3,7  
 129:7,12,18 132:19 135:19  
 142:24 150:21 156:7  
 166:21,22,25 167:3,4,7  
 183:16,25 196:7,9 202:13  
 210:25  
**operational** (7) 16:23 26:4  
 64:13 66:16 81:16 154:13  
 215:4  
**operationally** (9) 36:7  
 136:18,21 145:9 150:22  
 156:3 160:18,21 161:9  
**operations** (8) 3:24  
 135:14,16,22 137:1,4  
 168:8 172:8  
**operator** (4) 8:6 191:16,19  
 206:19  
**operators** (16) 13:11 50:19  
 57:4 78:4,11 79:16 84:18  
 120:23 169:14,16 171:1  
 182:16,25 185:10 206:21  
 216:4  
**opinion** (8) 39:13 44:1 60:3  
 62:16 71:20 76:5,7 80:18  
**opportunity** (6) 27:12 57:13  
 98:24 148:7 179:4 207:19  
**opposed** (1) 101:14

**opposite** (1) 90:24  
**ops** (1) 81:13  
**options** (1) 187:6  
**orally** (1) 89:17  
**order** (9) 16:9 91:5 121:8  
 127:12 151:20 168:5 189:2  
 196:15 209:6  
**orders** (2) 176:24 177:8  
**ordinary** (3) 8:11 19:24  
 178:21  
**organisation** (1) 145:20  
**organisations** (2) 134:17  
 151:5  
**organise** (1) 26:12  
**original** (3) 99:1 138:25  
 209:24  
**originally** (3) 7:17,18 50:5  
**others** (17) 17:12 23:14 49:8  
 51:21 58:11 65:25 67:22  
 69:9 70:22 87:9 110:19  
 119:10 121:4 145:3 148:1  
 184:11 199:3  
**otherwise** (6) 35:14 124:19  
 140:5 162:21 196:21  
 206:21  
**ought** (6) 28:19 47:15,18  
 59:24 61:17 128:12  
**ourselves** (3) 27:4 157:14  
 175:11  
**outcome** (1) 124:23  
**outset** (1) 31:22  
**outside** (4) 105:10 108:18  
 184:19 208:22  
**over** (42) 12:9 20:4,8 28:16  
 33:3 36:23 41:19,20 45:2  
 46:15,23 53:3 58:23  
 84:4,17 86:8 87:18  
 88:15,23 114:8 118:3  
 125:10 126:7,14 138:8  
 139:23 152:7,11 154:25  
 159:21 164:14 169:23  
 170:1 175:19 180:13 181:2  
 192:21 195:18 196:8  
 201:12,13 207:23  
**overall** (1) 158:13  
**overarch** (1) 70:8  
**overburdened** (1) 74:13  
**overlap** (2) 78:20 79:24  
**overloaded** (1) 40:3  
**overruns** (1) 28:15  
**oversight** (3) 32:13 118:6  
 188:14  
**overspeaking** (9) 3:7 13:23  
 22:17 26:17 32:25 33:2  
 97:13 126:11 200:4  
**overstretched** (1) 163:13  
**overwhelmed** (11) 30:22  
 102:23  
**overwhelm** (2) 159:24,24  
**overwhelmed** (11) 30:22  
 38:2 41:7 42:5 99:16,18  
 100:4,8 111:6 134:15  
 163:17  
**overwhelming** (2) 97:3,10  
**own** (16) 1:16 28:17 37:3  
 39:13 62:12,15 81:17,18  
 120:16 129:25 158:12  
 163:10 175:2 190:11,17  
 213:11

191:1 193:10 194:22 197:3  
 198:2,10 200:8  
**paragraphs** (4) 75:6 79:9  
 138:13 189:21  
**paramedics** (4) 8:15  
 50:18,21,25  
**parameters** (1) 102:12  
**paris** (1) 18:16  
**part** (27) 21:20 35:10  
 39:2,21 51:5 63:5 81:12  
 97:2 113:5 119:19 120:1  
 121:9 122:3 124:1  
 134:8,20,23 148:24 169:12  
 176:3 177:18 178:1 187:18  
 192:3 193:14 195:3 211:4  
**participant** (4) 121:12,18,20  
 162:19  
**participants** (2) 121:14 140:7  
**participate** (1) 208:24  
**particular** (10) 39:21 47:16  
 106:10 116:10 119:3 124:6  
 163:12 173:10 196:14  
 214:21  
**particularly** (7) 48:1 50:2  
 61:1 85:12 132:24 138:5  
 139:12  
**parties** (1) 156:10  
**partly** (1) 19:8  
**partner** (3) 1:14 6:17 23:5  
**partners** (22) 19:22 21:24  
 22:11 25:18 27:24 28:19  
 29:4,15,20 31:19 34:11,12  
 43:8,21 44:25 45:4 71:12  
 117:16 118:5 121:3 129:13  
 156:13  
**parts** (3) 137:10 171:19  
 187:17  
**party** (2) 168:6 183:17  
**passage** (6) 34:5,6 40:11  
 128:17 151:19,23  
**passed** (5) 117:5 176:24  
 198:20 199:6 211:15  
**past** (5) 5:8 9:18,21 62:21  
 97:25  
**patrols** (4) 190:8,14 191:4,6  
**pause** (4) 144:9 158:18  
 178:1 189:14  
**pausing** (1) 55:1  
**pbied** (2) 142:3,21  
**pc** (3) 20:20 25:19 26:24  
**people** (72) 2:1,4 13:15  
 28:24 32:22 33:11 40:23  
 42:7,11 44:9,22 48:25  
 49:17 54:2,3 58:18 60:20  
 61:3 66:3 68:8,14  
 69:8,15,17,18 70:12 71:2,2  
 78:25 84:15,21 85:24  
 92:10,11,18 93:9,21 97:12  
 102:13,17 103:4,14,17  
 106:23 114:23 124:4  
 130:23,24 135:4 148:12  
 150:17 162:2,5 163:1,3  
 167:3 179:10 181:21  
 182:22 183:5 185:13  
 186:13 187:3 193:20,24  
 196:14 197:11 200:3  
 206:17 207:16 208:7  
**peoples** (1) 131:18  
**perfect** (1) 148:15  
**perfectly** (6) 7:11,15 74:17  
 100:7 106:8 196:2  
**performed** (1) 194:15  
**performing** (1) 109:11  
**perhaps** (20) 18:9 30:6 55:1  
 73:25 74:21,23 76:8,18  
 90:2 98:12,12 105:12,16  
 112:19 113:12 129:10  
 132:24 139:23 168:1  
 184:19  
**period** (24) 12:7 23:16 33:19  
 46:13,15,19 89:3,4,10  
 95:12 117:10 125:4 148:20  
 150:9,11 153:18 154:11  
 155:5 156:18 159:21  
 171:14 187:20 209:11  
 210:18

**permutations** (1) 99:15  
**person** (19) 59:16 121:17  
 138:24 151:11 170:1  
 178:11 179:19 182:21  
 185:17 191:11,11,12,20,20  
 192:2,16 198:2 205:19  
 209:19  
**personal** (2) 60:3 150:3  
**personalities** (1) 85:17  
**personally** (2) 114:3 212:16  
**personnel** (5) 19:24 66:16  
 80:25 81:4 93:9  
**persons** (1) 197:9  
**perspective** (3) 4:20 120:16  
 158:12  
**persuade** (2) 41:22 42:8  
**phase** (2) 51:6 88:23  
**phone** (7) 35:12,15 130:23  
 134:2 136:1 196:24 199:18  
**phoned** (1) 202:21  
**phrase** (5) 7:10 62:13 67:12  
 192:13 210:6  
**physical** (1) 57:22  
**physically** (1) 36:1  
**pick** (2) 2:24 36:15  
**picked** (6) 23:2 44:11 124:24  
 131:4 152:14 160:3  
**picking** (2) 35:19 126:16  
**picture** (5) 18:18 37:18  
**pieces** (3) 201:4,17,21  
**piece** (6) 2:14 4:21 45:24  
 107:9 119:15 133:8  
**pieces** (3) 201:4,17,21  
**pile** (1) 103:25  
**place** (26) 5:16 13:21 16:15  
 23:7 26:19 27:7 32:16,18  
 39:16 43:18 44:2 50:23  
 60:20 62:15 70:9 119:15  
 143:1 147:9,9 156:12  
 159:7 182:10,13 186:2  
 187:3 206:3  
**placed** (4) 42:18 71:20 96:17  
 98:16  
**places** (1) 184:14  
**plainly** (1) 21:13  
**plan** (29) 15:1,13  
 16:4,5,10,22,23 17:5,6,11  
 28:11 33:2 51:4,8 52:2  
 54:5 57:10 88:20 129:23  
 144:15 171:16,15 172:20,22  
 186:2,11 187:3,5 207:21  
**planning** (2) 80:15 172:7  
**plans** (6) 6:10 19:11 21:13  
 28:6,8 30:11  
**platinum** (2) 147:17 148:12  
**plato** (10) 1:13,14 2:3,10  
 6:4,9,10 10:16,19,24  
 11:3,7,13 12:9,14,18,19,24  
 14:15 17:11,17 18:3,13,20  
 19:5,10,25 20:15,20,20,21  
 21:1,10,12,13 22:25 23:1  
 27:23 28:11 29:14,19  
 30:24 32:2,5 34:15 35:7  
 36:9 37:8 38:5 40:7,14  
 41:8 45:3,9,16 48:14,18  
 56:20 60:17 61:18,20  
 62:3,3,5,6 64:25  
 65:3,8,13,14 66:8 68:22  
 86:7 88:12 89:14,22,25  
 90:3,7,10 100:17,25  
 101:24 102:9,12 103:17  
 108:16,17 110:11  
 111:11,13,15,16 117:1,19  
 120:18 124:7 126:4  
 127:3,7 129:7,12,18  
 132:19 139:5 140:8 142:24  
 146:19 148:16 150:21  
 151:3 153:4 155:17  
 156:1,2,6,11,14,15,21  
 166:21,22,25 167:3,4,7  
 196:7,9 202:13 210:25  
**play** (9) 19:11 29:9 41:14  
 88:18 128:9,17 130:7,8  
 202:23  
**played** (8) 128:21  
 151:16,17,21 152:3,5

167:12 172:17  
**playing** (1) 10:3  
**please** (51) 36:16,24 41:18  
 42:13 47:9 51:1 52:3 53:23  
 54:11 56:23 63:15 66:9  
 75:9 77:22 80:10 81:7,8,15  
 89:14 91:14 93:2,7 94:25  
 106:14 107:9 109:25  
 120:14 121:19 125:25  
 126:7 137:15 138:8,20  
 139:23 141:23 142:19  
 143:9 144:2 151:14 152:4  
 158:8,14 159:16 164:10,13  
 168:1 172:3 173:24 180:25  
 182:24 209:6  
**pm** (8) 117:1 128:20,22  
 132:4,6 163:23,25 218:4  
**poer** (34) 127:10,20,25  
 162:12 164:2,5,6,10  
 178:17 180:3 187:15  
 188:16 189:8 191:11  
 196:1,4 197:2,14 199:22  
 200:5,17 205:19 206:17  
 210:5 211:21,23 213:7  
 214:4,25 215:12 216:17  
 217:21,23 219:12  
**pointed** (3) 24:17 118:10,18  
**points** (9) 20:8 41:15 43:5  
 87:24 119:8 144:12  
 154:3,4 172:21  
**police** (43) 6:17 27:21 37:9  
 43:25 44:13,25 64:3,5,9  
 67:17,21,22 68:1,10 74:22  
 76:19,22,24 77:4 91:22  
 105:5,18 106:4,7 113:15  
 118:19 144:22 145:3  
 159:23 164:16,18,19,25  
 165:6 171:5 172:10 176:13  
 189:1 194:16 212:3  
 215:19,21,22  
**policed** (1) 87:16  
**policeled** (1) 63:17  
**policies** (1) 1:13  
**policing** (12) 1:24 28:9,14  
 82:8 105:4,13,19,21,22,23  
 106:3 207:2  
**policy** (9) 6:9 19:10 27:23  
 28:17 38:24 46:3,4 61:20  
 70:8  
**polite** (1) 131:22  
**political** (2) 138:6 139:18  
**pone** (1) 39:3  
**poor** (1) 90:5  
**posed** (1) 93:11  
**position** (16) 15:9 17:8  
 29:13 34:8 100:6,8 107:18  
 108:15 110:7 111:23  
 112:11 113:15,16 154:22  
 185:6  
**positive** (2) 74:21 75:7  
**possibilities** (2) 112:24  
 122:11  
**possibility** (10) 14:24 18:15  
 61:5,8 62:19 75:10 113:2  
 145:11 152:13 194:23  
**possible** (18) 6:13 15:23  
 18:17 29:16 32:5 39:5 54:5  
 56:5 58:13 64:21 112:14  
 116:4 131:15 140:13 142:1  
 198:4 207:21 217:3  
**possibly** (10) 96:13 173:3  
 181:5 187:5 201:19 203:8  
 205:25 208:6 210:21 211:6  
**post** (7) 37:1,19 44:13  
 104:16 109:8 175:1 180:18  
**postincident** (1) 4:8  
**potential** (12) 10:2 11:6  
 16:18 38:11,13 75:16  
 88:10 93:10 95:10 117:6  
 140:9 145:2  
**potentially** (26) 4:15 8:20  
 15:20 32:1 53:21 61:25  
 66:24 67:5,6 77:8 95:8  
 98:23 103:9 104:15 114:16  
 131:4 137:5 139:20,22  
 143:20 144:21 146:13

progressively (1) 147:9  
 project (2) 104:21 105:2  
 promise (2) 86:7 115:13  
 promising (1) 188:18  
 promote (1) 133:1  
 promoted (1) 164:25  
 promotion (5)  
 72:12,13,15,20 74:9  
 prompt (1) 79:3  
 prompted (1) 152:16  
 pronounced (1) 205:22  
 proper (2) 15:6 16:4  
 properly (4) 4:4 74:17 113:8  
 144:14  
 property (1) 75:14  
 proposition (1) 134:22  
 prosecuted (2) 2:7 4:17  
 protect (3) 17:18 70:11 71:2  
 protection (4) 28:23 65:22  
 70:18 93:14  
 protective (2) 93:18,18  
 protector (1) 183:16  
 protocol (2) 114:9 125:6  
 protocols (1) 175:4  
 protracted (1) 2:17  
 proud (2) 123:2 125:5  
 provide (14) 7:20 9:4 10:6  
 26:12 32:5 93:15 114:7  
 132:25 147:10 175:14,21  
 176:19,22,25  
 provides (1) 4:7  
 providing (3) 40:24 108:18  
 176:20  
 provision (1) 67:19  
 prudent (1) 192:24  
 ps (1) 84:4  
 pss (2) 164:4 219:11  
 public (10) 19:20 75:14  
 92:22,25 93:1,4,9 138:5  
 139:13 168:5  
 publics (1) 93:15  
 published (1) 162:16  
 pull (1) 149:6  
 purely (2) 58:21 79:15  
 purpose (8) 2:21 3:2,2  
 132:24 201:11 206:18  
 211:16,17  
 purposebuilt (1) 183:14  
 purposes (2) 132:23 133:1  
 putting (10) 16:15 19:15  
 41:15 43:4,5 57:6 86:14  
 91:24 148:22 156:3

---

**Q**

q (643) 1:11,16,19,21  
 2:9,12,21 3:2,7,10,12,24  
 4:3,7,10,15 6:9,15,20,25  
 7:2,6,13,22 8:8,14,17  
 9:14,16 10:8,15,18,23  
 11:14 12:2,7,16,24  
 13:12,24 14:1,3,5,15,22  
 15:9,13 16:3,21 17:6  
 21:2,9,12,18  
 22:2,5,9,15,24 23:3,18  
 24:1,14 26:17 28:3,16  
 29:12,18 32:21,25 33:2,25  
 34:4 37:25 38:4 40:9  
 41:2,4,6,15 43:22  
 44:3,12,20,23 45:2,6,9  
 46:13,19 47:18,22  
 48:1,7,10,13,18,21  
 49:3,8,11,17,20,23,25  
 50:5,8,11,13  
 51:1,11,16,19,24 52:9,9  
 53:4,8,10,12,14,23 54:8,11  
 55:1,6,8,23  
 56:2,8,12,15,18,20,23  
 57:6,10,14,20,25  
 58:6,11,17 59:1,3,5,19  
 64:5,8,20,23  
 65:2,6,14,18,20,22,24  
 66:3,6,9 68:12,16,19,22  
 69:1,5,7,12,14,17,20,22,24  
 70:10,19,22 71:7,22  
 72:12,17,22,25 73:2,5 74:5  
 75:22 76:7,18 77:5,13,19

78:3,9 79:2,9,15  
 80:3,6,10,21 81:6  
 82:15,18,22 83:12,15  
 84:1,5,18,21,23  
 85:1,4,6,16,20,23  
 86:2,14,19 87:2,6 88:1  
 89:1,7 91:19  
 92:7,13,16,23,25 93:2,7,17  
 94:1,5,12,20 95:16,24 96:2  
 97:20,25 98:4,7,11  
 99:5,13,20 100:6,11,23  
 101:4 102:3  
 103:1,6,8,15,20,24  
 104:11,17,21,25  
 108:1,10,18 110:14  
 112:3,5,10 113:18 114:2  
 115:13  
 117:4,8,10,14,18,22  
 118:2,10,18,24  
 119:8,15,21 120:1,10,22  
 121:7 122:2,8 125:19,25  
 126:6 127:6,10,16 128:17  
 129:10,15,22 130:3,22  
 131:6 132:18,22 134:22  
 135:1,7,16,19,22  
 136:2,5,8,12,17,20,24  
 137:7,15 138:18  
 139:2,18,23 140:1,3  
 141:12,23 142:5,7,9,11,20  
 143:5 144:1,12,23  
 145:2,6,14,19,24  
 146:2,4,6,16,19,22  
 147:1,3,8,12,17,20,23  
 148:8,12,15,20,22  
 149:10,15,18 150:6,16  
 151:4,8,14 152:17  
 153:3,9,14,17,20,23  
 154:3,6,8,11,25 155:4,11  
 156:2,6,17,21  
 157:20,22,24 158:1,3,5,8  
 159:14,16 160:11,20  
 161:9,12,22  
 164:12,16,18,21,23,25  
 165:2,5,8,14,17,21,24  
 166:2,4,8,18,21,24  
 167:2,7,10,12,17,19,22  
 168:1,7,11,14,18  
 169:2,6,17,23  
 170:1,4,9,12,15,22,24  
 171:1,4,10,14,17,20,24  
 172:20 173:4,22  
 174:13,16,19 175:8,10,13  
 176:6,8,16 177:21,24  
 178:3,20,22  
 179:1,4,8,10,13,17,24  
 180:18,24  
 181:7,10,12,16,25  
 182:3,7,10,13,16,19,21,24  
 183:5,8,11,18,21,24  
 184:2,7,17 185:3,6,17  
 186:2,10,16,19,22,25  
 187:2,24  
 188:3,5,7,11,13,25  
 189:4,20  
 190:11,14,17,19,22,24  
 191:15,17,20,24  
 192:1,13,18,21  
 193:3,8,10,20,23  
 194:2,4,9,15,19,25  
 195:6,11,16 196:6,11  
 197:8,22  
 198:1,6,8,10,14,16,18,20,23  
 199:6,13,25  
 200:10,14,19,22  
 201:6,9,11,15,20,24  
 202:4,11,13,15,17,20,22,25  
 203:6,9,15,17,19,24  
 204:1,6,9,12,15,19,24  
 205:1,4,7,22 206:1,21,24  
 207:1,9,13,16,19,23  
 208:1,4,7,10,13,16,19  
 209:5 210:9,16,20  
 211:3,10,13  
 212:1,8,11,15,17,19,22  
 213:11,14,18,20,23  
 214:7,11,13,18

216:3,9,11,13  
 qualification (1) 136:25  
 qualifications (2) 97:20,21  
 qualified (1) 168:21  
 quality (1) 158:3  
 qualityed (1) 85:21  
 quantified (1) 136:13  
 quantify (1) 144:23  
 quarter (1) 62:21  
 queens (3) 41:21 72:22 74:10  
 question (36) 20:3,5,14 30:9  
 33:12 34:10 42:11 79:12  
 99:14 104:5,25 106:9,13  
 108:15 110:9,10 111:10  
 115:13 120:16 123:8  
 125:13 141:23 142:18  
 144:24 150:6 156:17  
 157:11 166:8 175:10 180:7  
 186:11 187:15 208:10  
 210:21 211:3,20  
 questionable (1) 98:13  
 questioning (8) 1:6 119:11  
 131:20 132:12 140:6  
 150:16,19 215:14  
 questionnaire (1) 119:19  
 questions (38) 1:4 6:3,5  
 34:14 42:23 47:2,7,8 63:12  
 72:3 73:9 74:17,19 85:10  
 86:6 99:21 100:13 103:25  
 116:10,12,16,19,23 119:17  
 125:14 131:6,11 132:9  
 157:15 164:5 216:17,19  
 219:5,6,7,8,9,12  
 quick (3) 102:23 115:23  
 161:20  
 quicker (1) 33:10  
 quickly (13) 6:12 49:25 50:3  
 53:15 54:4 55:6,17 64:20  
 83:5 106:21 115:21 126:7  
 127:6  
 quicktime (1) 67:2  
 quite (24) 2:14 12:2 15:9  
 16:2 20:3 24:2 28:18,22  
 29:1 52:23 99:24,25  
 102:14 107:5 112:22 113:6  
 123:11 124:25 144:14  
 150:16 157:18 180:6 200:5  
 216:14  
 quote (2) 33:18 39:25

---

**R**

rachel (1) 195:8  
 radio (46) 8:2,6 12:9 13:6,11  
 14:21 26:21 34:16 35:3  
 36:18 48:13 50:19 57:4,21  
 78:11,15,21 79:20 81:18  
 83:9 84:18 115:19,19  
 117:5 152:2,8 159:25  
 160:5,16 169:13,16 171:1  
 174:5,9 182:16,25 183:3  
 185:10 191:16,19 203:10  
 206:19,21 213:6 215:21  
 216:4  
 radios (4) 157:24 159:23  
 160:24 183:2  
 railings (1) 94:3  
 railway (1) 49:15  
 raise (2) 26:3 113:18  
 raised (5) 59:23 124:10  
 159:3 170:22,24  
 ran (1) 74:22  
 randall (28) 75:24 84:3  
 125:22 126:9,12,15,17,22  
 127:7,12 130:17 152:10  
 158:22 162:11,12  
 164:3,4,6,11,12 172:6  
 186:11 187:16 189:17  
 195:4 197:17 216:17  
 219:11  
 randalls (1) 159:3  
 range (1) 75:15  
 rank (3) 135:12 176:12 186:3  
 rate (1) 148:13  
 rather (14) 5:4 10:19 14:15  
 15:15 19:2 48:15 55:21

62:18 77:5 106:21 123:7  
 124:17 158:21 178:13  
 rationale (4) 20:9 24:23  
 28:12 103:19  
 rationales (4) 3:4,22,25  
 176:22  
 rationalise (2) 5:23 29:4  
 raw (1) 38:1  
 reach (1) 200:10  
 reached (1) 40:6  
 react (1) 6:10  
 reacted (1) 10:11  
 reacting (1) 6:15  
 reaction (7) 7:10 9:2,15 18:6  
 60:16 61:17 62:15  
 read (22) 1:23 34:13  
 36:14,25 89:20 90:4  
 101:11 113:6 121:6 124:15  
 140:17 144:8 147:13  
 151:22 157:16 158:17  
 162:16 172:1 176:11  
 185:11 192:13 193:13  
 readily (1) 135:12  
 reading (2) 112:17 124:14  
 reads (2) 79:11 111:5  
 ready (6) 19:13 131:17,18  
 185:4,7,11  
 real (10) 34:17,19,25 50:1  
 62:4 67:23 71:14 92:20  
 93:10 135:4  
 realise (2) 62:5 111:7  
 realised (2) 4:23 117:20  
 realises (1) 111:6  
 realistic (3) 34:20 36:1 145:9  
 realistically (2) 40:3 59:24  
 reality (11) 9:17 10:15 19:10  
 32:4 41:6 48:18 60:15  
 61:13 68:12 146:23 199:20  
 really (40) 3:12 14:17 20:16  
 22:12 34:10,13 37:2,18,21  
 38:2 39:12 41:1 50:2 61:8  
 62:7 67:16 74:20 76:2 89:1  
 93:3 96:6,8 97:10 99:3  
 109:9 113:9 126:6  
 133:4,9,11 134:1 140:12  
 144:3 159:10 166:8 186:10  
 205:15 208:9 209:15  
 217:17  
 reason (13) 2:15 3:8 29:21  
 41:25 71:24 75:25 120:11  
 121:2 124:12 131:23 134:9  
 155:25 184:10  
 reasonable (4) 7:11,16 38:9  
 61:24  
 reasonably (7) 7:15 91:2  
 92:5 94:14,23 96:4 174:8  
 reasoned (1) 4:4  
 reasons (14) 63:18 82:22  
 94:17 114:12,14 115:13,14  
 134:2,18 150:25 184:19  
 185:18 190:2,5  
 recall (11) 21:23 22:10,24  
 23:17,18 24:9 26:15 38:7  
 168:13 172:9 193:1  
 recalls (1) 26:8  
 receive (3) 75:22 84:12  
 210:24  
 received (10) 139:4 146:22  
 165:6 166:9 167:14 168:21  
 171:11 190:12 214:13  
 216:9  
 receiving (4) 9:21 155:12,22  
 215:1  
 recently (1) 72:9  
 recognise (1) 73:14  
 recognised (5) 3:18 6:11  
 49:25 74:12 76:18  
 recognising (1) 74:13  
 recollection (4) 22:2 124:14  
 133:13 192:5  
 reconsider (2) 98:25 99:1  
 record (11) 2:22 3:13,24 5:8  
 24:18 45:6 49:12 98:4  
 118:13 202:1 203:7  
 recorded (5) 4:18 9:19  
 177:10 200:23 201:2

recording (8) 80:23 125:21  
 126:1 128:5,18,21 152:5  
 176:21  
 records (4) 3:3 6:20 23:25  
 24:4  
 red (4) 25:7,8,10,14  
 redacted (1) 76:12  
 reduce (1) 25:16  
 reduced (1) 32:19  
 reducing (1) 95:14  
 reestablish (1) 1:5  
 reevaluate (2) 153:4,6  
 refer (9) 1:22 78:5 100:25  
 101:6,13,22 102:9 172:20  
 197:16  
 reference (20) 19:8 71:9,9  
 90:20,22 91:14  
 94:12,15,20 96:7 103:4  
 106:17 120:4 144:16  
 173:12,25 174:6,22 195:13  
 201:17  
 references (4) 94:18 99:13  
 101:10 153:23  
 referred (6) 75:2 101:25  
 147:12 191:21 215:5,8  
 referring (10) 75:18 90:20  
 102:18 103:15 108:16,16  
 144:6 151:20 159:4 166:4  
 refers (3) 54:21,21 84:19  
 reflect (4) 140:4 142:16  
 163:17 165:24  
 reflected (1) 118:21  
 refocus (1) 73:25  
 refresh (1) 198:25  
 regard (1) 145:8  
 regarded (3) 3:25 168:24  
 215:15  
 regardless (3) 81:25 82:7  
 96:12  
 regret (2) 188:13 193:12  
 regular (2) 81:21 168:4  
 regularly (4) 45:17 158:24  
 160:23 161:16  
 rehearsal (1) 110:1  
 rehearsal (1) 168:22  
 reiterate (1) 10:9  
 related (2) 151:8 167:8  
 relates (2) 48:1 63:25  
 relating (1) 147:4  
 relation (17) 16:15 21:5 49:8  
 51:15 66:14 67:7 75:25  
 95:16 105:3 122:11 132:19  
 136:2 139:4 145:7 167:19  
 169:19 171:11  
 relationship (2) 77:9 188:5  
 relatively (3) 3:18 73:15 74:7  
 relayed (1) 152:11  
 released (3) 35:9 36:3 84:3  
 releasing (2) 34:22 158:22  
 relevant (7) 2:19 21:9  
 103:14 169:18 183:12  
 193:14 197:11  
 relieve (1) 158:1  
 relieves (1) 109:20  
 religious (1) 138:10  
 remaining (3) 79:17 95:21  
 207:9  
 remains (1) 29:14  
 remarkable (1) 189:5  
 remarks (2) 96:3 138:11  
 remember (11) 5:15,16  
 23:10 122:24 137:13  
 153:17 155:6 167:18 193:9  
 201:19 205:21  
 remind (3) 84:1 175:10 192:3  
 remote (2) 175:18 176:18  
 removed (1) 182:8  
 removing (1) 140:23  
 rendezvous (8) 43:8  
 144:12,17 145:6,10  
 154:3,4 157:20  
 repeat (2) 89:15 137:10  
 repeatedly (1) 100:25  
 repeats (1) 24:6  
 rephrase (1) 142:19  
 replaced (1) 154:6

replacement (1) 205:8  
 report (10) 9:18 11:14 38:7  
 75:4 96:16 134:8 140:10  
 155:15 193:23 207:2  
 reported (6) 7:21 8:24 9:10  
 56:15 147:21 155:19  
 reporting (1) 152:7  
 reports (14) 6:22 7:14  
 9:7,21,21,22,23 10:18  
 24:24 48:16,22 61:11  
 155:1 193:17  
 representatives (2) 64:12  
 182:13  
 representing (1) 152:21  
 represents (1) 132:8  
 request (4) 59:20 190:3  
 216:9,15  
 requesting (1) 58:6  
 requests (2) 177:7 199:15  
 require (6) 63:21 136:21  
 145:8 175:14 183:6 185:19  
 required (12) 2:19 9:4 13:6  
 43:11 80:7 114:6 160:7  
 173:6,11 177:9 182:8  
 211:11  
 requirement (2) 57:22 77:15  
 requirements (2) 32:18  
 33:20  
 rescind (2) 11:4 45:14  
 rescinded (2) 10:25 11:1  
 rescue (3) 40:13 120:13,25  
 rescuers (1) 90:13  
 reshaping (1) 105:2  
 resides (1) 156:7  
 resilience (4) 175:14,19  
 176:19 187:5  
 resource (3) 78:12 80:16  
 115:17  
 resourced (1) 177:10  
 resources (31) 16:16 17:18  
 19:25 50:6,9 70:7,17 71:6  
 84:20 90:8 92:22,23  
 93:12,24 105:22,23  
 113:21,21,23,24 114:4,17  
 115:8,10,21 116:4 149:8  
 157:8 169:16 173:6 175:23  
 respect (3) 46:24 50:14 87:3  
 respectfully (1) 61:19  
 respects (1) 158:6  
 respond (1) 85:12  
 responded (1) 12:23  
 responders (5) 2:2 12:23  
 27:18 58:1 68:4  
 responding (3) 13:17 58:2  
 144:11  
 response (31) 6:16 12:19,24  
 20:5 21:21 31:6 38:19  
 47:20,24 50:17 55:9,21  
 56:6 63:17,23 64:3 85:7  
 104:22 105:3 106:3,7  
 149:5 157:15 168:12 174:2  
 175:2 207:1,17 208:24  
 209:10 210:7  
 responsibilities (2) 57:18  
 69:23  
 responsibility (13) 8:4 36:2  
 54:23 78:14 79:19  
 81:19,20 93:3,15 104:13  
 153:25 169:3,9  
 responsible (3) 80:15 105:8  
 177:7  
 rest (1) 163:10  
 restricted (1) 141:19  
 result (5) 6:6 69:2 74:15  
 105:5 114:14  
 resume (1) 1:6  
 retained (1) 143:11  
 reticence (1) 19:12  
 return (1) 30:21  
 revealing (1) 122:15  
 revert (1) 102:3  
 review (8) 22:17,20,21 45:9  
 73:23 75:13 172:12,13  
 reviewed (3) 45:16,17 66:12  
 reviewing (3) 22:25 23:1  
 45:12

reviews (2) 85:1,1  
 richardson (11) 12:3 15:25  
 25:19 26:3,5,7,24 49:4  
 146:24 147:4 148:1  
 rid (1) 157:3  
 ridiculous (1) 60:3  
 rightly (5) 23:23 95:16  
 124:25 147:12 160:24  
 rigid (1) 46:4  
 rigour (1) 45:18  
 ring (7) 59:16 82:1,8 194:13  
 195:17 196:21,25  
 ringing (2) 129:3 196:14  
 rise (1) 148:9  
 risk (18) 2:4 16:18 18:11  
 39:4 61:16 62:16,16 68:2  
 70:4,17,19 71:1 75:10,17  
 88:9 93:10 99:2 150:13  
 risked (1) 33:22  
 risks (4) 15:23 65:20  
 68:16,19  
 road (1) 190:9  
 role (60) 8:5,10 29:8,9  
 31:1,6,15,15 33:17 42:18  
 50:11 51:3 53:2,3,24 63:22  
 75:20 81:20,21 82:6 83:18  
 87:19 98:16,18  
 109:11,12,17 111:2  
 120:16,22 135:12  
 152:24,24 154:8 158:12  
 164:15 165:2  
 168:3,11,18,22,25 169:2  
 177:11,13,16,22,25 178:2  
 179:5,11 181:8 185:22  
 186:3 187:24 191:18,19  
 202:23 209:12 216:13  
 roles (14) 31:14,21,24  
 32:13,17 33:21 53:1,2 79:7  
 108:23 167:12 169:17  
 172:17 187:4  
 room (134) 2:2,2 9:19 11:14  
 13:12,13 26:10 35:18  
 46:14 55:4 57:1 70:12  
 71:2,10 74:20,23  
 75:8,19,20 76:1,3,19 77:23  
 78:13,19 79:11,18,22  
 80:4,8 81:10,14  
 82:12,16,20,24,25 83:4,12  
 84:9,12,13  
 85:4,6,11,14,16,24 90:14  
 96:9 108:21 121:5 161:8  
 166:17 167:13,14,24  
 168:11,16 170:5,15,17  
 172:18,20  
 173:1,2,5,13,19,25  
 174:4,6,8,13,15,21  
 175:15,18,21 176:4,10,17  
 177:9,11,16 178:8



safe (15) 13:4,16,18,23 14:5
17:14 19:19 68:8 69:2
70:23 91:2 94:14,23
96:4,24
safety (2) 68:14,23
safety (2) 19:20 28:24
sake (2) 66:23 160:4
same (30) 7:24 12:15 20:23
29:21,22 33:17 39:18
67:24 79:12 80:12 81:8,10
83:11 90:21 91:19 95:1
110:18 115:8,10,16 131:2
154:16 159:2 161:3 176:2
177:15 188:15 191:20
199:20 201:10
sas (1) 78:17
sat (3) 55:3 109:16 125:24
satisfied (5) 15:25 37:4,7
88:15 113:24
satisfying (1) 139:16
saunders (174) 5:12,15,25
18:1,23 19:1 20:3 25:4,13
26:2 27:1,14 28:22 29:6,23
30:5,13 31:20 32:4
33:3,12,15 38:14
39:7,18,20 41:17 42:13,22
43:1 45:15 46:7 47:4
55:11,15,19 60:5,13,25
61:5,7,12,15 62:4,10,21,25
67:8,14,21 72:1 73:20
74:12 76:23 77:1 86:3,5
88:14 89:12 90:9,17
91:5,10,12 96:22 97:8,12
105:8 106:6,12,16,20
107:3,8 108:20,23
109:1,6,25 110:3,8
111:3,18 112:16,24
114:9,13,20,25 115:4
116:9,14,22 122:19 123:13
124:1,4,11 125:12
127:20,25 128:4 130:14
131:12,21 132:1,3
133:9,13,20 134:1,10
137:17,22 139:6 140:12
141:1,13 157:1,5,9 158:21
162:1,9 163:1 164:1,9
178:6,8,10,16 180:1
187:9,13 188:15 189:5
191:3,7,10 195:23
196:2,14,17,19,21
197:1,10,13 199:17,19
200:4,15 205:10,15,18
206:7,9,11,14,16 209:23
211:18,20,22 213:5
214:1,20 215:11 216:20
217:6,10,16,22,24
save (2) 92:18 105:20
saying (27) 5:11,18 11:15
19:4 33:5 41:25 42:1,2,5
45:19 49:5 55:12 56:12
86:14 87:12 88:14 90:10
91:16 96:23 102:15 107:8
114:21 140:18 150:17
179:10 200:23 201:2
scale (2) 135:4 144:18
sca (1) 158:16
scapegoat (2) 99:22,24
scapegoating (1) 73:7
scenario (3) 16:1 88:1,2
scenarios (1) 10:2
scene (66) 7:15,18,19 9:4
11:9 13:2 14:6,16 15:5,15
16:12 17:23 20:19,25 37:5
39:17 40:24 49:3,4,8,17
50:25 52:9 54:20,22 61:3
91:2,17 92:1,14,21
94:14,16,23
95:2,7,17,18,22,23,24
96:4,8 138:24 146:23,23
147:10 148:10,17,18
151:1,11 152:22 153:12
154:1 155:18 173:17,23
175:25 176:20 177:6
178:11,12,18 199:3 204:13
schedule (7) 188:11 191:1
197:14 198:23 200:11

202:4,25
school (2) 167:16 183:15
screen (14) 1:21 26:13 39:23
47:10 52:11 64:8 116:2
120:4 125:25 127:18 128:9
180:2 181:18 212:1
screens (1) 137:17
script (1) 85:23
scroll (2) 180:5,14
scrutinised (1) 105:24
search (8) 15:19 16:14,19
17:4 25:23 115:23 116:1
145:9
searches (1) 135:16
seated (1) 130:18
seats (1) 185:15
second (18) 3:2,18 33:16
52:10 59:19 63:19
95:6,8,17,18 96:18 121:17
122:14 125:14,19 137:7
142:21 155:24
secondary (5) 16:8 61:22
142:5 145:11 159:19
secondly (3) 96:25 145:14
162:23
secret (11) 118:15 119:13,23
120:8 121:24 122:6
129:2,13,20,23 130:3
section (7) 1:23 40:4 41:6
52:4 63:4,19 176:12
secure (1) 92:5
security (3) 105:14,15
147:10
see (59) 1:9 5:17 12:4 42:25
59:23 61:14 81:6,11 86:25
95:2 108:11 112:14 120:20
121:13 126:3,15 127:4
143:3 144:3 151:19 167:2
171:24
172:4,5,12 22:22,25
173:4,15,22,25 174:1,22
175:16 176:12 178:23
180:9,10,14,18,20,21
181:1 189:20,24 191:2
195:3,6,11,19 198:10,23
200:19 201:5,24 202:1,2
217:5
seeking (1) 209:16
seem (6) 30:8 67:19 101:24
117:10 129:19,22
seemed (1) 122:10
seems (7) 96:22 102:3 104:6
107:5,10 128:2 216:25
seen (17) 7:4 40:22 48:23
49:5 97:20 108:11 143:14
178:18,19 176:1 177:20
178:24 181:5 184:2
210:10,11
sees (1) 111:5
selected (1) 75:6
selfcontained (1) 77:23
send (3) 10:11 115:21 129:6
sending (1) 35:11
senior (12) 5:22 80:13 106:2
110:23,25 126:25 170:3
175:22 183:1 199:11
202:18 205:2
sense (14) 14:22 16:3 20:24
42:4,4 77:18 83:11 119:5
123:7 136:24 167:7 178:20
199:13,25
sensibly (1) 4:12
sent (6) 12:2 50:5 59:12
71:19 95:22 143:25
sentence (4) 2:12 39:25 40:1
89:1
sentences (1) 113:7
separate (4) 76:5 81:12
129:10 158:15
separated (2) 108:24 182:7
separately (1) 206:8
sequence (4) 125:14 131:6
143:14,17
sergeant (9) 91:21 136:6
159:1 190:1 200:25
201:6,7,7 203:9

series (4) 41:15 43:5 46:21
63:5
serious (4) 11:18 92:10
168:2 185:19
service (35) 22:2,3 27:24
29:15 36:14 37:10,12
40:13 50:9 63:21,24 66:13
68:4 93:18 94:5,5,10
96:13,15 97:1 117:16
118:5 120:12,13,25
124:13,13 129:13 160:16
175:1 194:17 211:7,7
215:23,23
services (50) 1:4 2:3 19:22
20:10 28:18 29:20 30:23
34:12,24 35:24 36:4
37:4,16 43:8,24
44:14,14,24 45:4 50:1 54:6
56:10 64:10,23 65:10,15
66:1 68:13 69:7 70:15 93:5
98:19 118:16 121:22
160:14,21 161:12 165:10
174:25 177:2,4 182:14
190:10 211:1,5,11,13
214:9 216:23 217:5
set (59) 13:16 15:10 19:16
20:10 34:16,21,22 35:23
36:19 37:2 41:13 43:7
54:16,18 55:17 56:12
57:14,17 58:9,11,14
64:16,18 115:19 126:23
145:11 156:14,15,22
157:24 160:4 161:1 163:15
168:5 172:18 173:17
174:4,6 183:21,24
184:10,23 185:6,25
186:4,14,16 187:9 191:21
193:6,8 198:6 199:3 207:3
208:5 209:8,22 214:23
217:8
sets (3) 44:5 60:4 116:5
setting (10) 36:4,21 161:2
173:20 174:9 183:18
184:22 192:25 201:22
206:1
setup (2) 85:16 170:4
seven (1) 103:4
several (2) 140:7 167:25
sexton (19) 1:3 47:13 48:18
50:15 55:8 66:7 69:22
75:18 78:24 86:6 104:6
107:14 170:16 188:1 197:5
201:2 210:24 214:22 219:3
sextons (3) 200:22 203:2
215:5
sfc (1) 156:25
sfcs (1) 156:19
shakes (1) 215:2
shall (1) 45:19
share (2) 49:23 71:22
shared (8) 5:21 56:3,4
213:1,9,12 215:19,22
sherlock (1) 79:7
shes (3) 191:16 197:23,23
shift (1) 186:12
shifts (2) 78:21 80:22
shoes (2) 207:24 209:14
shooter (7) 15:21 71:15
100:13,14 101:7 138:23
143:4
shooters (2) 137:12 140:6
shooting (3) 62:2 155:2,15
shoots (1) 95:14
short (14) 12:7 17:4 51:4
62:23 83:15 116:18 128:17
131:11,24 132:5
151:4,8,16 176:11
shorter (3) 42:20 125:4
150:9
shortly (6) 48:23 167:19
168:19 203:6 204:19,21
should (53) 5:1,6,6 10:7
12:19 13:22,22 14:10
15:22 17:19 18:2 19:17
20:7 23:16 25:19 26:11
27:15 34:1,16 36:5,21

43:14,20 45:23 46:2 51:9
54:3 62:15 64:11 65:4
75:15 82:24 85:21 90:2
98:25 103:17 105:9 118:15
124:10,16 134:22 143:1,20
148:4 152:24 162:16,20
173:5 174:4 209:5,11
210:25 216:5
shoul dnt (4) 21:19 56:6 99:8
145:14
shout (4) 115:25 213:3,5,8
shouted (2) 20:20 215:24
shouting (1) 138:10
shoutout (3) 143:15 144:7,7
show (1) 116:6
showered (2) 49:25 111:21
shows (1) 115:17
shrapnel (1) 147:5
sic (2) 88:6 201:12
side (6) 20:1 37:6 40:6
109:19 148:22 201:25
sign (1) 115:23
signals (2) 160:2 162:7
significance (7) 96:6,9 138:7
139:19,20,22 140:5
significant (20) 3:19 12:22
14:12 38:22 40:25 52:22
78:23 83:19,20,25 85:12
96:16 97:23 99:14 109:11
124:1 136:16 143:7 148:6
193:24
significantly (6) 32:19 39:6
45:22 60:8 112:6 125:6
signifying (1) 101:1
silly (1) 112:7
silver (120) 34:23 36:4 37:17
41:12 46:9 57:14,16
64:16,18 77:17 126:23
146:9,12 159:2,5,8 160:25
167:13,14,16,24
168:5,11,16 172:18
172:3,13,18,18,25
174:4,13,15,21
175:15,18,20
176:3,10,17,25,25
177:6,8,11,16
178:6,8,12,14,15,18
181:8,20 182:3,10,11,19
183:9,14,18,22
184:4,4,9,12,12,22
185:14,25 186:4,8,14,17
187:5 191:22
192:8,10,14,19,25
193:4,11 194:6
196:22,23,23 197:24
198:3,6 199:8 200:17
201:18,22 203:15
204:6,9,13,16,16
205:4,8,20 206:11,18
207:4 208:1,4
209:8,22,25 210:9,11,12
214:8,13,14,24 216:5,6
silvers (1) 195:12
similar (2) 50:9 180:16
simple (1) 102:14
simplistic (1) 62:13
since (3) 29:24 109:12
189:13
single (13) 5:5,10
86:22,23,24 88:4 101:23
102:20 130:6 137:12
138:23 140:5 182:3
singleaction (3) 86:21
87:6,10
sio (1) 198:14
sir (284) 1:5 5:12,15,25
11:1,12,23 19:1 20:3
25:4,13 26:2 27:1,14 28:22
29:2,6,23 30:5,13 31:20,23
32:4 33:3,12,15 38:14
39:7,18,19,20 41:17
42:12,13,22 43:1 45:15
46:7 47:4 55:11,15,19
60:5,11,13,25
61:5,7,12,15,19
62:4,10,12,21,25

67:8,14,20,21 71:25 72:1,2
73:20,24 74:12 76:23 77:1
86:3,5 88:14,16 89:12
90:9,17,19 91:5,10,12
96:22 97:8,12 105:8,11
106:6,12,16,20
107:3,7,8,12 108:20,22,23
109:1,2,6,7,25 110:3,5,8
111:3,9,18 112:16,21,24
113:19 114:9,13,20,25
115:4 116:8,9,10,14,16,22
122:19,22 123:13,22
124:1,4,8,11,21 125:12
127:20,24,25 128:2,4,12
130:14 131:12,17,21
132:1,2,3,7 133:9,13,20,25
134:1,10 137:17,22 139:6
140:12 141:1,13 157:1,5,9
158:21,23 161:25 162:1,9
163:1 164:1,9 175:12
178:6,7,8,10,14,16,19
179:23 180:1 185:24
186:18 187:9,13 188:15,24
189:3,5 190:23
191:3,6,7,9,10 194:14,24
195:23
196:2,10,14,16,17,19,21,23
197:1,7,10,12,13
198:5,7,19 199:16,17,19
200:4,5,15 202:24
203:8,23 204:8,11,14
205:6,9,10,15,17,18,21,25
206:7,8,9,11,13,14,16,23,25
207:8,12,15,18,22,25
208:12 209:23 210:8,15,19
211:2,6,12,18,19,20,22,25
212:7,18
213:5,6,13,17,22,25
214:1,3,10,12,17,20
215:6,11 216:16,20
217:4,6,10,15,16,22,24
sit (8) 51:11 130:5 146:8
162:9,24 170:22 182:11,14
site (2) 55:3 70:11
sited (1) 54:14
sites (2) 138:6 139:18
sits (2) 54:24 83:14
sitting (3) 171:17 187:25
193:1
situated (2) 80:12 83:3
situation (15) 4:10 17:21
25:21 29:3,22 45:21
47:13,19 63:8 77:13 97:1
124:21 150:9 163:8 169:19
situational (10) 13:3 17:15
19:20 35:4,24 36:5 39:3
151:10,11 207:13
situations (2) 62:11 63:20
six (2) 79:17 103:4
size (1) 145:4
skill (1) 42:8
skilled (2) 41:21 42:11
skills (1) 210:16
slight (1) 187:13
slightest (1) 112:18
slightly (7) 8:21 45:25 70:1
121:7,8 136:13 217:19
slogans (1) 138:11
slow (6) 39:1 67:6 98:23
149:25 183:24 186:1
slowed (1) 18:21
slowly (1) 193:13
slowmoving (1) 149:25
slt (1) 81:17
small (2) 80:17 182:5
smith (6) 13:21 14:1 43:16
44:4 56:8,12
social (2) 173:8,9
soft (3) 138:4 139:12 140:16
sold (1) 100:17
somebody (13) 13:13
19:18,23 127:7 144:6
146:16 184:9 185:21
186:16 192:1 198:6
209:9,13
someone (13) 31:18 55:2

91:7 104:18 128:9 160:5
186:6 188:19 191:21 202:2
209:7 210:13 214:18
something (49) 2:5 7:20,25
11:21 31:17 33:25
34:24,24 40:19 57:10,11
60:1 75:11 77:6 83:6,22
97:22 99:3 101:14 107:15
114:19 122:19 124:18
125:21 130:4,11 138:14
139:21 140:20 152:18
153:2 159:5 160:23
161:1,6,21 174:9,13
180:16 185:21 190:7
196:11 208:2 212:12
213:20 214:5,22 216:12,25
somewhere (3) 35:8 144:25
209:12
soon (9) 11:5 28:19 29:15
34:17 53:12 56:5 131:15
174:3,8
sooner (3) 69:14,14,17
sophisticated (2) 85:18
138:12
sophistication (1) 142:1
sort (11) 60:23 75:22 79:3
97:25 99:10 165:9 179:20
190:19 191:7 211:14 217:2
sorts (1) 179:17
sound (2) 76:17 214:1
sounds (2) 23:19 182:3
source (2) 11:15 49:19
south (1) 78:16
space (5) 78:19 79:23
182:16,19,21
spare (1) 183:2
speak (14) 14:1 36:13 69:20
115:1 121:21 134:7 190:25
193:11 196:2,5 198:11
201:13 207:19 214:9
speakers (1) 189:2
speaking (2) 65:10 124:13
127:13,16 128:10
130:18,24 131:4 137:19
141:18 144:5 171:2 181:20
189:15 201:9,25 202:8,17
203:1 204:2 205:1
211:5,10,13
speaks (1) 147:17
specialist (5) 19:25 65:24
93:24 149:5 172:8
specially (1) 69:8
specific (7) 17:9 83:7 84:18
102:10 104:5 171:21
specifically (6) 22:13 23:16
52:20 67:14 110:23 136:10
speed (1) 149:11
spelt (1) 39:13
spent (1) 210:22
sphere (1) 184:19
spoke (9) 136:9 164:6 184:5
191:12 192:18,23 193:4
200:7 204:21
spoken (5) 76:12 173:22
192:19 200:6 207:16
spontaneous (8) 109:19
135:13,17,22,24 136:14,20
137:5
srt (1) 149:19
srts (1) 71:19
staff (37) 34:22 36:3,8
37:8,12 46:8 71:17
75:11,18 77:10,16
78:10,15 79:20
80:14,15,17 126:24
164:19,23,25 168:15
169:4,4,9 176:13 177:4,9
183:4 185:9 186:8 198:3
206:3,7 212:16 213:2
215:21
staffed (3) 175:15,20 210:13
stage (14) 11:4 92:8 116:18
117:14,17,18 125:22
131:24 189:8 192:15,18
194:20 200:10 207:11
stages (25) 2:16 5:2 8:21

11:21 13:5 14:14 35:25
37:13 38:21 39:7 52:6 53:4
54:17 58:22 61:10
86:11,16 88:19 109:19
111:16 114:1 129:4,5
144:19 158:6
stall (1) 217:8
stand (6) 21:25 56:22
100:2,20 107:24 159:8
standalone (1) 52:21
standard (2) 14:11 15:22
standing (1) 184:22
stark (1) 89:1
starkly (2) 91:25 139:23
start (28) 10:9 16:15 25:17
31:18 35:9 36:3 37:17 39:1
50:20,24 61:24 67:2 98:8
102:15 128:9 129:14
131:17 137:16 141:4
152:18 181:22 184:22,24
185:11 190:3,15 209:24
217:13
started (7) 4:23 19:23 35:11
36:19 158:9 187:11 214:24
starting (5) 17:4 49:12 95:13
130:8 153:4
starting130222 (1) 128:9
startling (1) 112:23
stated (2) 38:10 209:4
statement (28) 1:23 3:15
9:24 24:25 26:8,14,18
27:22 28:2 30:25 31:24
33:16 105:1 129:6 162:16
186:7 188:7 189:12 192:21
197:15 198:1,10 200:7
204:1,19,25 211:24 217:2
statements (2) 1:19 40:10
station (1) 49:15
stay (5) 13:4,16,23 14:5
192:8
staying (1) 52:2
steer (2) 85:6,9
step (5) 73:2 174:20 180:4
207:24 209:13
steps (2) 141:15 185:6
still (32) 11:25 25:2 34:25
35:1 36:11,20 37:8,21
38:22 39:5 48:10,10 53:20
59:1 84:8 87:9,11 88:4
92:4,21 93:22 95:21 123:3
125:7 138:22 148:23 149:4
155:14,25 156:12 203:3
209:21
stop (6) 18:1 90:9 109:4,5
169:6 209:11
straight (1) 87:25
straightaway (1) 132:11
straightforward (1) 150:6
strategic (1) 176:23
stretchers (2) 93:20 94:7
strictly (1) 132:16
strong (1) 11:17
structure (3) 156:19,22
173:16
struggling (1) 142:18
stuff (2) 23:21 109:22
subject (1) 98:5
subjects (4) 138:3,10 140:15
141:22
subsequently (1) 112:18
substantially (1) 101:5
substitute (1) 8:14
succeed (1) 87:21
suffering (1) 92:11
sufficient (3) 70:11,17 157:6
suggest (9) 28:17 34:6 59:3
106:9 111:4 113:11 116:16
123:11 155:19
suggested (2) 30:6 120:11
suggesting (10) 8:8 18:5
19:1,5 20:11 28:6 42:3,14
96:2 209:5
suggestion (4) 18:2 106:4
127:21 201:15
suggests (1) 44:4
suite (1) 182:6

summarise (2) 38:14 199:7  
summary (6) 118:19 138:13  
147:4 180:11 187:19 199:1  
superintendent (19) 121:10  
184:7,17 193:12 194:11  
195:14 198:11,18  
199:13,22 200:6  
202:7,8,17,18 203:24  
204:3,20 205:11  
supervising (2) 78:14 79:20  
supervision (1) 190:1  
supervisor (21) 32:11  
78:10,17 79:21 83:13,16  
84:1 164:14,25 165:3  
168:19,25 169:2,15,20  
176:13 187:24 191:18  
201:7 208:8 216:14  
supervisors (9) 78:14,20  
79:19,23 80:24 83:9,17  
159:7 164:15  
supervisory (1) 84:23  
supper (1) 162:2  
supplying (1) 159:25  
support (17) 27:22 29:18  
74:12 79:7 80:7 83:8,18  
108:7 109:9,14 110:5  
114:5,7 144:20 169:11  
177:4 190:19  
supported (4) 62:17 65:18  
73:3,17  
supporting (4) 72:9 74:2,6  
177:2  
supportive (1) 74:3  
suppose (2) 40:25 58:15  
supposed (1) 82:3  
sure (32) 9:14 19:19  
26:18,19 31:25 42:19 56:2  
88:23 106:1 107:18 111:25  
112:12,22 120:5 127:25  
155:8 162:2 181:16 184:18  
185:10,13,14 188:19  
189:12 192:4 203:20  
206:3,4,5,6 207:20 214:25  
surprise (2) 150:22 151:3  
surprised (1) 150:23  
surprising (3) 107:10 150:20  
160:11  
surprisingly (1) 216:14  
surrounding (1) 35:5  
survival (1) 148:13  
suspect (3) 95:11,19 162:25  
suspended (3) 157:2,5,6  
suspicion (1) 7:16  
sustainable (1) 175:14  
sweep (2) 16:7 79:4  
swiftly (1) 198:4  
switch (2) 156:2 169:15  
switched (4) 83:6 84:17  
169:13 185:3  
sworn (2) 164:4 219:11  
synopsis (1) 196:2  
system (12) 57:3,5 60:6 79:7  
81:18 111:8  
115:9,11,16,17 159:18  
160:10  
systems (2) 116:7 163:15

T

tabards (1) 52:10  
table (4) 31:8 41:8 180:20  
210:6  
tac (7) 135:20,23 136:3,8  
159:17,20 160:4  
tactic (1) 17:3  
tactical (33) 14:16,17,25  
15:1,13 16:4,22 17:1,5,6  
51:7,8,11,14,16 52:5 53:24  
54:17 58:8 64:13  
173:1,5,17,23 176:20  
177:6,8 178:6,10,14  
214:7,14 216:8  
tactics (1) 136:10  
tail (1) 86:9  
taken (23) 14:9 50:23 59:25  
68:20 69:5 75:1 87:19  
90:13 96:19 100:12 103:1

105:12 111:19 121:7  
132:12 141:14 144:13  
149:6 156:8,22,25  
181:16,18  
takes (5) 17:24 153:24  
208:22 217:25,25  
taking (10) 26:14 68:4 79:9  
83:24 85:17 101:11 152:24  
157:16 161:17 194:15  
talk (18) 33:3 38:18  
78:11,12,15,21 79:25  
168:18 174:24 175:6  
212:3,5,8,11 214:7,11  
215:4 216:8  
talked (1) 160:20  
talking (25) 11:12 22:13  
23:17 32:23 35:1 85:10  
91:6 102:13 108:20,24  
117:23 137:17 139:8 145:4  
213:14 140:5 180:5 189:9,11  
191:7 210:1 213:15  
214:5,6,21  
talks (3) 66:17 173:10  
178:10  
tap (1) 156:3  
targeting (5) 138:4,6  
139:12,14,18  
targets (3) 138:5 139:12  
140:16  
tasked (2) 105:2 189:1  
tasks (5) 32:11 179:24  
180:10 181:7 185:19  
teaching (1) 165:9  
team (23) 71:19 77:23  
78:10,22 80:14,15 81:22  
106:2 110:24 128:13  
149:5,5 150:1 164:14  
169:3,11,21,23 186:8  
202:19 212:16 213:2  
215:20  
teams (13) 11:10 35:2,9,11  
43:13 49:24 50:5 81:21  
83:10 93:13 149:19 154:4  
155:9  
technically (1) 156:6  
technology (1) 160:17  
telecommunication (1)  
64:10  
telephone (3) 26:21 126:17  
202:1  
telling (7) 107:21 124:12  
127:7 130:12 133:16  
205:11,12  
ten (2) 132:1,2  
tend (2) 152:19 160:25  
tended (1) 80:22  
tends (2) 83:3 159:24  
tension (1) 148:8  
term (1) 33:14  
termed (1) 169:18  
terms (30) 48:1 49:3 70:22  
89:8 98:12 113:23 134:16  
135:8,22 136:13 137:11  
142:13,23 143:5 144:15,18  
146:6 147:13,17 149:16  
151:23 152:21 153:9  
154:12 169:24 199:14  
206:1 207:7 208:1 210:6  
terrorism (7) 48:10,15,19  
86:24 142:1 167:8 196:12  
terrorist (41) 11:17,18,24  
17:10 18:5 48:2,11  
60:16,22 61:16 86:22 87:6  
88:3,6,11,22 89:3,4,11  
100:18 101:1,6,8,8,14,23  
102:4,10,15,19,22  
103:2,12,13,16 132:22  
140:17 142:13,16 161:23  
terrorists (2) 8:19 61:2  
terroristtype (1) 110:22  
tested (2) 110:1 161:16  
text (1) 59:11  
tfc (13) 16:13 21:14 46:10  
135:19 136:25 153:10,20  
154:2,6,14 156:9,15,24  
tfc (1) 156:19

thank (64) 1:10,11 5:25 6:1  
19:2,3 21:2 24:14 26:2,2  
27:8,13,17 29:6 37:25  
39:22 43:4 46:7 47:2,4,5  
60:11 67:14 71:25 72:1  
76:18 77:1,19 79:9  
80:10,21 86:2,5 91:12,13  
100:11 106:12 110:8  
116:8,9,24 128:4 131:10  
132:3 137:22 157:9 161:25  
162:1 163:4,22 164:1,9  
181:18 189:7 195:21 196:3  
197:1 205:18 211:22  
215:11,13 216:20 217:16  
218:3  
thats (116) 3:2,12 4:3  
7:11,12,17,22,25 8:1,2  
10:5 11:11 15:9,24 16:11  
19:3 20:3,13 21:8 22:14  
23:15 24:14 27:8,13 29:11  
30:16,17,22 32:24 33:25  
35:20 37:2 42:20 43:18  
44:6,15,16 45:5,8 51:5  
52:1 57:11 60:11 63:7  
64:17 67:20 68:9,9 69:9  
70:9 74:11 75:2 76:12 77:2  
87:11 89:12,22,24,25  
90:17,19 91:23 93:6,17  
95:2 98:1,24 100:18,20  
101:1,16,22 102:4,21  
103:9,18,22 104:10,25  
107:25 108:11 109:2 113:4  
121:6 123:20 124:25  
125:11 127:24,25 130:11  
132:12 140:20 141:13  
144:20 145:12 147:8  
152:15,25 165:19 169:6  
173:12 177:19 178:11  
179:3 183:2 192:14 194:6  
196:6 203:4 204:5,17  
205:15 213:1 214:6,25  
215:1  
theme (1) 33:17  
themselves (2) 169:16  
204:17  
thereabouts (1) 182:1  
thereafter (1) 24:20  
thered (4) 11:15 20:18,19  
109:9  
therefore (16) 2:20 3:20 4:12  
13:8 16:16 22:11 31:16  
51:7,16 62:15 65:22 88:12  
98:17 99:3 122:25 143:4  
theres (53) 3:8 5:16 10:9,20  
23:12 24:18 25:10 31:25  
34:5 38:11,22 45:24 46:1  
53:12 56:2 57:15 61:25  
62:18,19,19 67:5,11 71:14  
82:25 85:6,11 88:9 99:18  
101:4 106:9 107:3,11  
109:13 111:7 113:18  
123:17,18 126:11 130:1  
135:12 136:20 141:21  
148:8 153:9,17 163:5  
172:24 180:14,15 183:1  
207:2 216:22 217:10  
theyd (5) 48:24 71:5 159:22  
161:9 199:9  
theyre (19) 8:9,14 25:8  
41:25 42:3,23 49:19 69:9  
74:2,8 82:8 91:24 99:10  
115:2 140:22 168:4 181:10  
185:10,14  
theyve (3) 42:8 67:16 73:16  
thing (15) 14:8,9 22:18  
52:11 56:9 60:1,13 90:11  
123:3 124:17 125:7 150:3  
192:7 199:20 202:6  
thinking (10) 18:8 24:21  
52:17,18 73:23 91:7  
129:14 155:20 210:9  
216:21  
thinks (2) 47:7 67:4  
third (3) 126:9 215:3,25  
thirdly (2) 97:2 122:16  
thorough (1) 204:1

thoroughly (1) 30:11  
though (2) 87:2 104:5  
thought (20) 12:13 20:22,25  
90:2 92:8 93:9 99:16 110:3  
122:17 125:9 139:3 142:20  
160:11 178:4 181:7 187:11  
189:13 196:18 208:24  
214:23  
thread (1) 22:22  
threat (37) 6:16 7:16 8:18  
14:12,19 16:6,20 34:25  
36:10 37:22 38:23  
45:12,22 52:23 56:7 62:5  
66:21 70:4 71:10 87:23  
92:6,21 93:11 94:9  
95:13,15,21 96:12,13  
98:24 104:3,4 105:25  
142:2,9 148:10,24  
threats (1) 15:23  
three (12) 24:5 41:21 65:10  
30:16,17,22 32:24 33:25  
35:20 37:2 42:20 43:18  
44:6,15,16 45:5,8 51:5  
52:1 57:11 60:11 63:7  
64:17 67:20 68:9,9 69:9  
70:9 74:11 75:2 76:12 77:2  
87:11 89:12,22,24,25  
90:17,19 91:23 93:6,17  
95:2 98:1,24 100:18,20  
101:1,16,22 102:4,21  
103:9,18,22 104:10,25  
107:25 108:11 109:2 113:4  
121:6 123:20 124:25  
125:11 127:24,25 130:11  
132:12 140:20 141:13  
144:20 145:12 147:8  
152:15,25 165:19 169:6  
173:12 177:19 178:11  
179:3 183:2 192:14 194:6  
196:6 203:4 204:5,17  
205:15 213:1 214:6,25  
215:1  
throwaway (1) 113:9  
tied (1) 153:1  
time (103) 3:21 4:5 6:15  
7:24 11:2 12:7,15  
15:3,6,24 20:23 24:19 32:9  
34:25 38:8 41:11 45:11  
58:18 90:24 91:3 93:17  
94:24 96:5,17 97:17  
98:15,23 101:9 102:13,14  
103:3 104:4,6 108:13  
110:25 113:12,13 117:6  
123:10 125:24 128:5  
129:11,17 130:25 131:2  
142:12 143:17 147:23  
149:2,3,6,16,18,25 151:24  
154:11,16 156:7,8,18  
158:1 159:21 162:18  
165:20 167:1,20,21 169:5  
170:3 174:12,14 176:1  
177:20 180:24 183:15,24  
184:4 186:1 192:15,17  
193:4,24 195:3  
202:10,19,22 203:1,10,22  
204:7,25 208:25  
209:15,18,24,25  
210:1,18,22 211:12  
216:11,18 218:1  
timecritical (1) 149:22  
timed (1) 194:20  
times (17) 28:13 32:1 39:24  
42:5 45:3 78:20 79:23  
83:19 94:19 103:4,5,8,9  
126:2 134:19 148:17  
167:25  
timing (2) 6:6 144:4  
timings (3) 8:20 95:11  
122:23  
title (1) 164:12  
today (3) 50:13 171:24 197:4  
todo (2) 199:14,14  
together (11) 31:25 32:7  
33:13 65:10 69:7 86:15  
87:24 89:17 91:24 149:7  
158:24  
told (38) 14:24 17:7 25:6  
26:9 29:15 30:18 41:4

43:14 56:10 65:7 70:10,14  
92:2,3,17 106:17 123:15  
124:16 129:18 130:3,15,16  
133:15 134:7 166:9,11  
167:2 183:21 188:25  
193:16 196:7,11 198:21  
199:10 205:12 209:4,8  
215:1  
tom (2) 201:1,15  
too (6) 27:15 31:6 38:4 46:4  
155:8 217:20  
took (14) 1:12 6:21 21:20  
23:7 33:17 70:16 84:4 87:3  
92:13 96:20 99:7 121:9  
137:9 158:1  
topic (12) 30:20,21 67:24  
116:11 135:7 137:7 144:12  
145:19 146:19 155:14  
157:10 211:23  
topics (2) 135:7 210:20  
total (1) 158:5  
totality (1) 2:25  
totally (4) 37:15 73:16 98:11  
146:9  
touch (2) 193:5,8  
touched (1) 90:25  
touching (2) 170:19,21  
towards (5) 108:7 109:23  
126:11 173:15 190:4  
train (1) 125:19  
traffic (4) 169:10 189:25  
190:8 191:6  
tragedy (2) 80:4 110:12  
tragic (3) 86:19,21 87:2  
trail (1) 4:7  
trained (8) 8:10 24:5 69:8,9  
75:11 78:24 168:24 190:19  
training (27) 21:3,5,9  
22:6,24 23:3,6 24:3,4,10  
75:22 76:4 110:14,16  
135:8,9 159:6 165:6,8  
166:9 167:14,15,22 168:23  
171:11 183:15 185:25  
transcript (21) 5:17 12:17  
90:21 94:21 100:23 102:8  
112:17 113:6 125:25  
127:19 128:6,7,11,18  
134:13 143:9 151:15,17  
153:15 195:2,6  
transcripts (1) 146:22  
transition (1) 203:13  
translate (1) 16:22  
translated (2) 19:14 43:12  
transmission (5) 130:21  
152:2,8,11 203:10  
transmissions (4) 8:3 14:21  
26:21,21  
transmit (1) 213:6  
transmitters (2) 159:25,25  
transport (2) 76:24 200:17  
trauma (6) 7:19 8:3,9 9:4  
10:6,12  
travel (2) 170:12 203:17  
travelled (1) 206:8  
treated (3) 25:25 26:11  
148:13  
treating (3) 65:7 71:4,13  
treatment (7) 40:24 63:25  
93:16 147:18,24 148:4,6  
tree (1) 81:14  
tri (1) 160:15  
tried (2) 23:8 71:5  
trigger (1) 12:19  
triggered (2) 12:20,24  
triservice (6) 34:16 41:14  
44:23 157:24 160:5,24  
trouble (2) 34:18 197:17  
true (7) 18:14,18 36:10  
62:16 92:20 123:25 130:22  
42:12,15  
try (16) 26:5 31:3 32:8 33:4  
38:14 44:23 72:6 75:12  
97:16 131:12 134:5  
144:19,23 161:22 185:11  
190:9  
trying (20) 5:15 19:7 33:12

41:22 42:8 43:2 73:5 86:15  
89:16 92:7 96:18 97:12,15  
126:24 141:12 166:14  
185:25 200:1 209:7,14  
tuesday (1) 119:18  
turn (5) 34:4 50:18 139:7  
149:22 189:17  
turned (5) 3:9,20 4:24  
124:19 185:2  
turning (1) 50:20  
turnout (2) 149:7,23  
turns (1) 10:24  
type (11) 11:11 14:12 137:24  
138:14 142:11 147:20,25  
148:5 149:25 150:3 178:24  
types (1) 147:24

---

ultimately (3) 54:6 66:22  
125:5  
umbrella (1) 64:3  
unable (1) 120:23  
unacceptable (1) 154:21  
unarmed (12) 13:2,17,22  
17:12,18 19:18 92:21,22  
93:8,12 149:1 154:5  
uncertainties (1) 88:5  
uncertainty (1) 88:7  
unclear (3) 8:22,25 17:22  
uncommon (1) 83:21  
understand (41) 3:11 9:16  
11:5 12:10 15:19 16:19  
18:3 25:2,4,23 27:2 32:4  
38:6 39:16 42:22 55:1  
73:21 74:3 84:9 86:12  
89:16 90:10,17 94:1 97:5  
99:20 112:5 123:11 131:14  
134:13 135:1 142:18  
143:12,13 144:21 148:14  
159:6 166:14 172:14 199:1  
205:4  
understandable (1) 163:16  
understanding (47) 8:7 9:6  
11:2,17 12:12 14:23 15:4  
22:5 23:8,9,15 28:5  
39:1,4,12 44:17 66:14 70:6  
71:11 77:8 95:8 135:3  
137:8 141:9 142:12,15  
143:22 147:23 148:15  
150:4,12 159:1,5 160:9  
165:14,15,17 172:23 176:2  
177:15 179:21 184:5,20  
212:4 214:25 215:12,17  
understands (3) 61:18  
145:14 217:24  
understood (18) 15:8 16:1  
32:17 44:7 75:10 89:22  
90:1 97:7 121:11 135:12  
146:11 150:18 159:22  
160:6 161:4 176:6 179:6  
193:23  
undertaken (3) 166:18  
167:22 168:11  
undertook (1) 106:25  
underway (2) 138:2 141:5  
undoubtedly (3) 5:22 20:12  
94:10  
unequivocal (2) 14:18 15:14  
unequivocally (1) 17:7  
unexpected (1) 186:5  
unfair (2) 117:22 180:7  
unfolded (1) 207:14  
unfolding (3) 168:16 169:19  
199:2  
unfortunate (1) 112:19  
unfortunately (5) 47:1 75:24  
94:4 131:1 215:7  
uniformed (1) 81:13  
unilaterally (1) 156:9  
unique (2) 20:10 116:5  
unit (10) 9:7 78:13  
80:16,17,23 81:16  
169:8,10 172:7,11  
united (1) 160:14  
units (2) 65:25 77:20

U

V

unless (6) 39:24 47:6 53:5  
67:22 131:4 217:17  
unlikely (1) 2:18  
unmonitored (1) 58:25  
unnecessary (1) 29:25  
unpacked (1) 209:25  
unplanned (1) 168:12  
unplug (1) 210:2  
unprecedented (1) 163:8  
unprepared (3) 106:18  
163:9,12  
unquestionably (1) 53:6  
unrealistic (2) 57:16 145:13  
unreasonable (1) 155:23  
unsure (3) 116:1 185:24  
189:9  
until (25) 8:7 18:18 20:22  
25:2 29:5 39:14 46:15,23  
47:6 57:16,22 62:7  
64:12,17 71:16,17 72:9  
73:16 74:8 88:14 144:20  
150:11 154:6 214:23 218:5  
untruth (2) 123:14,16  
unverifiable (1) 11:15  
update (2) 152:13 153:1  
updated (2) 206:5,6  
updates (1) 13:10  
updating (1) 202:20  
upon (3) 85:20 90:25 165:24  
urgent (1) 12:19  
urgently (2) 6:10 93:21  
used (27) 2:9,12 4:12,21  
5:4,8 28:12 32:17 33:14  
44:2 58:16 101:8 111:21  
113:7 129:7 138:15 160:17  
161:7,9,16 175:8  
212:15,16 213:16 214:1  
215:21 216:1  
useful (2) 133:8 173:9  
using (3) 44:4 139:2 170:17  
usual (2) 13:9 50:18  
usually (6) 99:10 135:25  
178:14,17 179:7 196:23  
utilised (3) 44:8 160:25  
174:3

---

value (1) 107:9  
value (2) 10:1 176:3  
variety (1) 136:20  
various (17) 32:17 48:13  
78:15 79:20 90:8,8 110:20  
114:4 130:23,24 152:20  
159:19 172:21 175:23  
176:22 177:1 180:10  
variously (1) 132:15  
vehicle (1) 115:19  
vehicles (4) 144:18,22  
145:1,4  
venue (1) 141:17  
verbalise (1) 5:10  
verbalised (6) 5:1 25:1 26:1  
45:11,24 46:2  
verbally (1) 45:17  
version (2) 172:6,14  
via (3) 8:6 58:6 59:21  
vicinity (3) 24:16,21 176:18  
victims (1) 155:22  
vigour (1) 118:20  
virtually (1) 88:22  
visible (1) 180:6  
visiting (7) 113:20,21,23,24  
115:8,10

wanting (2) 20:9 98:19  
 warn (12) 26:11 66:11 15,24 67.4 71:18 93:23 148:24 149:2,4,11,12  
 warning (1) 10:10  
 warnings (1) 17:19  
 warnock (1) 144:14  
 wasnt (5) 5:7 9:15,25 11:1,18,20 15:1 18:18 19:7 20:22 22:1 25:1 36:20 37:20 40:20 41:2,22 45-10 49:7 50:11,13,16,20,24 54:15,16,18 60:9 86:22,25 87:2 93:16,23 94:9 95:6,18,20 103:11 107:22 114:15 123:1,1 125:5 134:20 150:17 152:13 159:2 161:4 166:15 180:7 185:7 198:9 199:22 214:3 216:1  
 watched (1) 134:13  
 watching (1) 151:19  
 way (40) 13:9 18:4 30:15 32:8,9,14 42:23 44:5 57:6 70:1 73:2 74:8,22 78:23 83:15 87:16 90:4,4 102:23 126:9 129:1,19 130:13 131:13 140:20 155:19 156:3 163:14 167:8,9 173:2,12,19 181:23 188:18 190:4,15 212:2 213:7 214:8  
 ways (1) 106:8  
 we154527 (1) 195:3  
 weapons (1) 7:3  
 wear (2) 93:19 149:12  
 weatherby (40) 1:4,6,8 5:12,14,20 6:1 18:4 19:3 20:6,11,13 22:14 26:2,3 27:8,14,17 29:6,7 30:7,15,16 32:9 33:1,13,16 39:20,22 43:1,3 46:7,8 47:2,4 122:2,4,8 162:14 219:5  
 weatherbys (1) 119:10  
 wed (3) 2:14 4:21 30:18  
 wednesday (3) 6:21 21:4 119:18  
 week (4) 121:16 162:18,25 164:3  
 weeks (1) 2:15  
 welfare (2) 180:14 181:1  
 welltravelled (1) 153:6  
 went (8) 2:5 26:11 39:18 157:12 165:10 167:15 186:12 187:9  
 werent (18) 22:10,11 37:3 49:14 52:9 67:23 72:22 77:16 97:3 99:16 102:10 104:22 105:6 124:11,20 134:3 150:24 205:19  
 west (1) 74:18  
 weve (39) 2:24 9:9 20:4 23:4 24:5 39:23 40:5 43:23 45:2 48:23 52:7 67:15 81:17 89:7 91:2,23 94:23 95:17 96:4 97:12,20 100:24 101:21 106:6 121:11 126:1 136:13 170:6,15 179:13 181:20 182:4 184:2,2 197:4 210:10 214:4,6 217:8  
 whatever (11) 3:15 47:22 48:3 64:1 73:9,14 124:12,21 130:25 156:18 183:8  
 whats (10) 82:2 102:15 126:15 131:12 144:21 152:16 178:1 180:21 185:13 200:13  
 whatsapp (5) 143:8,11,24 144:11 160:13  
 whatsoever (1) 130:2  
 whenever (2) 131:17 207:20  
 whereas (1) 138:18  
 whereby (1) 148:12

whichever (1) 142:11  
 whilst (10) 17:10 34:25 35:25 37:21 97:21 100:3 152:10 162:23 201:25 210:23  
 white (1) 161:22  
 whoever (3) 17:13 82:19 156:6  
 whole (7) 46:13,15,19 58:18 77:19 101:5 141:8  
 whom (3) 127:12 156:23 163:11  
 whos (6) 13:14,14 26:14 85:11 144:11 196:24  
 whose (3) 153:25 208:13,16  
 wider (1) 156:9  
 willing (1) 9:25  
 willingness (1) 164:8  
 winchester (3) 23:5 24:11 110:15  
 wish (4) 20:5 131:7 133:10 158:19  
 withdraw (2) 45:14 71:5  
 withdrawn (4) 70:7 71:16,16 148:18  
 withdrew (1) 71:6  
 withheld (1) 211:1  
 witness (9) 30:4 131:17 132:8 140:20 164:7 188:7 189:12 192:21 211:23  
 wonder (1) 47:9  
 wondering (2) 61:13 115:20  
 wont (12) 20:8 35:14 36:14 39:25 77:19 99:5 105:15 116:17 137:10 158:16 163:1 217:20  
 work (31) 23:8 31:24,25 32:7 38:17 64:5 65:25 68:23 69:8,12 70:24 72:25 80:22 81:5,20 83:10 84:24 87:25 88:14 107:9 110:3 128:12 131:12 163:11 179:1 185:11 186:20 187:21 209:14,23 213:7  
 workable (1) 160:9  
 worked (8) 25:22 38:16 158:24,25,25 159:12 172:11 188:3  
 working (12) 13:9 77:8 108:10 121:22 174:10 175:5 179:15 180:3,15 188:5 204:15 215:9  
 workload (1) 24:2  
 works (3) 57:3 76:1 79:1  
 worse (1) 133:10  
 worth (2) 198:12 199:10  
 worthwhile (1) 124:9  
 wouldnt (34) 3:20 11:1 14:19 17:16 28:24 29:4,25 32:15 40:21 58:13,17 61:21 62:3 70:15 88:3,5,10 94:7 103:1 114:18 129:19,21 131:3 137:19 139:21 143:19 149:8 150:4 155:18,23 156:12,25 181:6 217:7  
 wounds (3) 7:4 61:11 140:11  
 write (1) 3:21  
 writing (2) 29:2 30:6  
 written (1) 4:11  
 wrong (12) 2:5 6:3 71:8 76:6,8 85:9 98:1,1 121:8 124:18 168:7 215:1  
 wrongly (3) 23:23 107:10 160:25

X

x (1) 219:1

Y

yards (1) 162:4  
 yeah (3) 34:15 36:21 200:24  
 years (5) 1:24 19:6 25:22 112:4 166:10  
 yesterday (19) 5:21 6:21 28:9 30:18 41:11 45:13

50:8 70:10,16 89:18,24 92:19 98:22 117:4 122:25 128:14 145:12 157:11 171:20  
 yet (5) 74:20 75:1 87:6 122:18 182:22  
 youd (24) 2:3 12:17 14:15 15:10 17:6 19:14,16 20:5,16 29:18 70:25 92:2,3 104:18 113:14 123:11 139:4 144:25 154:12 158:19 204:4,21 213:23 216:9  
 youll (11) 73:12 100:24 108:13 118:10 119:22 120:6 169:6 172:5 191:1 192:4 210:5  
 youre (66) 4:19,25 5:11 12:2 13:19 15:7 17:24 23:17 27:1,9,21 28:5,7,21,23 29:7,7 33:7 38:4 39:2 42:1,14 45:18 52:20,23 53:4 55:12,16 61:14 70:1 73:3,11 74:7 76:23 83:12 87:11 88:14 90:10 91:6 92:9 93:17 97:18 101:12 102:6 106:8,16 108:4,20 111:6,11 112:5,7 115:1,20,25 116:15 123:5 139:7 144:6 153:20 189:9 191:3 201:21 203:1,3 217:4  
 yours (1) 41:7  
 yourself (12) 33:9,10 49:20 54:1 90:12 98:7 168:24 183:21 197:17 203:21 211:5,13  
 youve (46) 3:3 8:20 25:6 28:3 37:1 43:3 48:21 57:10 63:11 75:1 81:5 83:22 85:9 86:6,11 89:17 90:4 92:17 95:16 97:22 99:5,8 100:12 101:25 103:24,25 107:2 112:19 117:22 118:7 132:14 133:23 134:18 137:7 140:6 143:11 145:19 148:17 150:16 153:3 166:11 169:17 183:21 196:7,11 209:25

Z

zone (27) 24:17,23 25:3,7,8,11,14,25 26:11 37:9 66:23,25,25 67:4,4,4 70:7 71:4,8,14,18,18 93:23,23 148:23 149:2,4  
 zones (8) 25:17 66:11,15,19 67:7 70:3 90:8 154:1  
 zoning (13) 14:5 21:3,9 22:6,16,17,25 24:15,19 25:5 26:6,9 45:6

0

001424 (1) 195:3  
 0015 (1) 46:23  
 0017 (3) 46:16 154:6,25  
 001854 (2) 128:5,9  
 0025 (2) 144:1,5  
 0417 (1) 101:17  
 055 (1) 101:16

1

1 (15) 15:2 20:21 42:15 44:16 63:11 77:23 97:5,6 104:12 158:21 166:9 172:4 215:4 219:3,5  
 10 (10) 20:17 33:11 79:10 117:11 122:3 147:17 148:12 149:9 157:14 218:6  
 100 (1) 136:16  
 10146 (1) 101:20  
 102 (1) 128:20  
 1034 (1) 7:9  
 1035 (1) 11:18

1037 (1) 117:1  
 104 (1) 128:22  
 1047 (1) 117:8  
 10471048 (1) 117:23  
 1048 (1) 117:25  
 1049 (1) 117:25  
 10s (1) 75:2  
 11 (7) 47:6,6 79:24 95:13 128:8,9 151:17  
 110 (1) 132:4  
 1108 (1) 62:22  
 1115 (1) 96:11  
 1120 (1) 175:11  
 1127 (1) 62:24  
 1150 (1) 216:12  
 1155 (1) 216:12  
 116 (1) 219:8  
 12 (3) 78:21 80:6,10  
 121 (1) 132:6  
 12month (1) 125:4  
 132 (1) 219:9  
 15 (6) 116:17 145:1 170:14 172:6 203:18 209:11  
 150 (1) 162:4  
 1626 (1) 188:16  
 164 (2) 219:11,12  
 1759 (1) 151:23  
 18 (2) 91:22 92:3  
 1811 (1) 152:8  
 1902 (1) 101:17  
 1996 (2) 164:21 171:14

2

2 (10) 28:13 54:2 70:8 79:11 118:22 122:22 123:5 154:21 159:16 215:4  
 20 (12) 62:21 91:22 92:3 120:18 131:19 149:24 150:5 170:14 189:16,24 210:2,5  
 2008 (2) 104:24 105:4  
 2010 (1) 164:25  
 2011 (1) 181:25  
 2013 (1) 165:2  
 2014 (1) 165:11  
 2015 (2) 18:17 165:11  
 2016 (2) 21:17,18  
 2017 (29) 23:7 24:9 78:16 79:21 80:13 119:21 120:5 121:11 165:14,18,22 166:11,21 167:7,19 168:14,25 171:7,14 172:2,13,15 176:6 177:17 179:6,15,21 181:7 187:17  
 2018 (1) 122:3  
 2019 (2) 72:25 172:13  
 2021 (2) 1:1 218:6  
 2056 (1) 101:17  
 21 (1) 189:20  
 216 (1) 163:23  
 22 (15) 97:22 110:12 163:8 165:22 166:11,15 167:12 170:5 172:16 174:11 179:1 187:17,22 212:13 213:14  
 2234 (2) 53:20 188:8  
 2235 (1) 136:7  
 2236 (1) 136:7  
 2238 (1) 192:9  
 223824 (1) 191:12  
 223921 (1) 193:16  
 224157 (1) 194:21  
 2243 (1) 12:16  
 2244 (1) 146:4  
 224423 (1) 195:1  
 2245 (1) 196:6  
 2247 (4) 12:14 20:15 146:20 196:6  
 2248 (1) 146:23  
 2250 (2) 147:1 148:2  
 2254 (1) 147:3  
 225756 (1) 198:16  
 22nd (8) 29:21 32:24 51:24 72:19,25 77:14 84:2 98:11  
 2304 (1) 151:14  
 2305 (1) 151:24  
 2306 (2) 200:10,14

231036 (1) 200:19  
 231236 (2) 202:4,11  
 2313 (1) 153:4  
 2314 (6) 94:12,20 95:4,20,25 96:3  
 231832 (1) 203:2  
 2321 (1) 203:11  
 2323 (1) 153:11  
 2326 (2) 153:14,24  
 2338 (1) 203:21  
 2353 (4) 95:4 153:17,20,25  
 23542355 (1) 95:3  
 2355 (2) 91:20 95:3  
 24 (1) 124:15  
 2402 (1) 101:18  
 247 (2) 213:3 215:20  
 25 (2) 118:3 191:1  
 2526 (1) 102:5  
 26 (1) 121:11  
 2616 (1) 101:18  
 27 (2) 120:5 193:10  
 2829 (1) 101:19  
 29 (2) 1:24 194:22

3

3 (16) 10:23 12:8 20:1 54:2 78:10,22 163:22 164:14 169:3,11,21,23 212:16 213:2 215:4,20  
 300 (1) 163:25  
 33 (1) 197:3  
 335 (1) 112:4  
 34 (1) 198:2  
 35 (1) 9:18  
 36 (1) 9:20  
 3617 (1) 198:24  
 37 (1) 198:10  
 38 (2) 138:1 141:3  
 39 (2) 138:13 200:8

4

4 (5) 2:15 19:6 49:11,12 195:3  
 41 (2) 100:16,20  
 410 (1) 67:25  
 412 (1) 66:10  
 415 (1) 218:4  
 416 (1) 149:11  
 43 (1) 63:16  
 430 (1) 162:9  
 44 (2) 30:25 64:8  
 45 (2) 144:13 209:10  
 4500 (2) 200:11,15  
 47 (1) 219:6  
 4950 (2) 200:19,22

5

5 (4) 54:3 137:25 139:8 189:16  
 51 (1) 26:13  
 5160 (1) 202:5  
 53 (1) 81:9  
 57 (1) 89:19  
 5734 (1) 202:25

6

6 (6) 75:9 121:12,18,20 128:5 138:20  
 60 (1) 162:21  
 61 (1) 1:22  
 68 (1) 147:14

7

7 (5) 1:1 76:9,10 77:20 172:11  
 70 (2) 106:14 107:13  
 72 (1) 219:7  
 74 (2) 115:6 122:5

8

8 (1) 9:12

9

9 (4) 9:12 33:16 77:22 105:1  
 930 (4) 1:2 162:24 217:19 218:5  
 999 (1) 84:12