

# OPUS2

Manchester Arena Inquiry

Day 100

May 10, 2021

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Monday, 10 May 2021

(9.30 am)

PSS IAN RANDALL (continued)

SIR JOHN SAUNDERS: Good morning.

MR DE LA POER: Good morning, sir. We are joined again this morning by Mr Randall and may I call first upon Mr Wood, who represents the interests of Chief Inspector Sexton and Superintendent Dexter.

Questions from MR WOOD

MR WOOD: Good morning, I have a small number of questions for you on behalf of Chief Inspector Sexton, all right?

You said on Friday that, in your opinion, it was the right decision for you to be the person to go and set up the Silver room at the time that you were sent to do that; is that right?

A. It is.

Q. I just want to expand on that briefly, please.

Mr de la Poer made four suggestions to you about things which might have been an advantage for you staying in the room over somebody else who came into the OCR. All right? I just want to remind you of those. They were, firstly, that you had been on duty when this incident started.

A. Yes, sir.

Q. Secondly, that you had developed a degree of situational

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awareness whilst the incident was unfolding. Thirdly, that you had spoken to a number of key people.

Fourthly, that you had been able to speak to the force duty officer because you were near him to understand what his plan was. All right?

A. Yes.

Q. Were those four things also an advantage for you when you were setting up and managing the Silver control room?

A. I believe it was, sir.

Q. For example, if senior officers were to come to the room, the Silver room, who hadn't been in the operational control room or been able to talk to anybody there, you would have the advantage, having been involved from the start, when you had to brief them and bring them up to speed; is that right?

A. Yes.

Q. You were asked some questions about really how easy it is to set up the Silver room, turning on the computers, et cetera. But you weren't just going to set it up, you were also going to manage it, weren't you?

A. Yes, sir.

Q. And with a critical incident like this, an efficiently managed and properly run Silver control room is very important, isn't it?

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A. I believe it is.

Q. And we know, I think, that you were the most experienced duty room manager on duty that night.

A. Yes, sir.

MR WOOD: Thank you. Sir, that's all I ask.

SIR JOHN SAUNDERS: Thank you. Just before we have any other questions, I know it's only a 20-minute gap between leaving your first room and then going to the Silver room. But it would be of much more sensible, wouldn't it, to have them similarly located?

A. Yes, sir, it would be, and it is now.

SIR JOHN SAUNDERS: Yes, but it must have been perfectly clear then that it would have been sensible rather than having you go on a 20-minute trip from one to the other, to have it in the same place.

MR DE LA POER: Next can I invite questions on behalf of North West Fire Control by Mr Smith Queen's Counsel.

MR SMITH: Mr Randall, first of all --

SIR JOHN SAUNDERS: Mr Smith, sorry, can you stop for a moment? We can't see you at the moment. Now we can. Thank you. Please carry on. Sorry, we couldn't see you initially.

MR SMITH: Very important!

SIR JOHN SAUNDERS: Absolutely.

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Questions from MR SMITH

MR SMITH: Mr Randall, may I take you, first of all, to paragraph 49 of your statement of 6 January 2020, which is inquiry reference {INQ029312/10}.

(Pause)

You were able to provide the inquiry in this part of your statement with your recollection, is this correct, that when you were in Silver control, Laura Lewis mentioned a particular means of communication?

A. Yes, she did.

Q. Could I ask you to ensure that no reference is made to that particular means of communication because it is operationally sensitive material?

A. Yes, sir.

Q. So when you provide any answers to my questions, would you bear that in mind?

A. I will, sir.

Q. Your recollection was that that means of communication was opened while you were in Silver control and one of the staff members shouted out over the channel to see whether anyone from the Ambulance Service or the Fire Service was using it. You have said in your statement in that paragraph that you recall there was no response.

A. Yes, sir.

Q. First of all, would you just answer this yes or no: is

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1 it correct that the particular means of communication  
 2 that you were referring to in that paragraph is not one  
 3 of the shared Hailing groups or the police Hailing  
 4 group?  
 5 A. No, it's not.  
 6 Q. Thank you. Next, as far as Laura Lewis is concerned, is  
 7 it correct that she would not be the person responsible  
 8 for monitoring this means of communication once it was  
 9 set up?  
 10 A. No, she wouldn't, sir.  
 11 Q. She had a lot of other tasks to attend to, didn't she?  
 12 A. She did.  
 13 Q. So was the position that radio operators in Silver  
 14 control would be tasked with monitoring that means of  
 15 communication?  
 16 A. Yes, sir.  
 17 Q. Are you able to remember what time it was,  
 18 approximately, when the staff member in question called,  
 19 using this means of communication, to see whether the  
 20 Ambulance Service or the Fire Service were monitoring  
 21 it?  
 22 A. I believe it was just before midnight.  
 23 Q. Your recollection is assisted, isn't it, by the fact  
 24 that that took place shortly before there arrived in  
 25 Silver control, Station Manager Michael Lawlor from the

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1 Fire and Rescue Service?  
 2 A. I believe so, sir.  
 3 Q. If I tell you that my understanding is he arrived at  
 4 00.05, that would tie in, wouldn't it, with your broad  
 5 recollection of the time when that attempted  
 6 communication took place?  
 7 A. Yes, sir.  
 8 Q. The answer is due to receive evidence from the  
 9 operations manager at North West Fire Control,  
 10 Janine Carden. Have you been shown part of her  
 11 statement?  
 12 A. I have, sir.  
 13 Q. You will have seen, therefore, that she makes express  
 14 reference to a particular (inaudible: distorted) in her  
 15 statement, doesn't she?  
 16 A. She does.  
 17 Q. Is that the means of communication which you had in mind  
 18 when you prepared your statement?  
 19 A. Regarding the Talk Group?  
 20 Q. Well, what I'll do is I'll take you, if I may, to her  
 21 witness statement. Do you have it available?  
 22 A. I do.  
 23 Q. If you would go to paragraph 21, which is {INQ025470/7},  
 24 and read that to yourself, not aloud.  
 25 A. Yes.

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1 Q. Have you done that?  
 2 A. I have.  
 3 Q. She makes express reference there, doesn't she, in  
 4 paragraph 21 to the particular means of communication?  
 5 A. She does.  
 6 Q. Do you see that in the second and third lines of that  
 7 paragraph, she stated that she confirmed that  
 8 North West Fire Control were on the channel?  
 9 A. Yes.  
 10 Q. What I'd like to be clear about is whether you heard her  
 11 respond to the call –up using that means of  
 12 communication.  
 13 A. I wasn't monitoring that radio channel at the time, so  
 14 I wouldn't have heard the North West Fire Control  
 15 shouting up.  
 16 Q. So you're not suggesting are you, therefore, that that  
 17 didn't happen?  
 18 A. Oh no, sir, I just wasn't monitoring that channel, one  
 19 of the radio operators were.  
 20 Q. That's all I wanted to be clear about in relation to  
 21 that topic.  
 22 SIR JOHN SAUNDERS: Thank you, Mr Smith. Just in the  
 23 interests, I understand, of not dealing with anything  
 24 which is sensitive, I think most of us are a bit lost.  
 25 Can you just ask you this: is the channel or the means

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1 of communication that Janine Carden is talking about the  
 2 same one as Laura Lewis is talking about or a different  
 3 one?  
 4 A. It's the same one, sir.  
 5 SIR JOHN SAUNDERS: Thank you.  
 6 MR SMITH: Moving on from there, please, Mr Randall, to ask  
 7 you this: you do remember, don't you, the arrival  
 8 therefore of Station Manager Lawlor from the Fire and  
 9 Rescue Service in Silver command?  
 10 A. Yes, sir.  
 11 Q. After he had arrived did you hear any discussion  
 12 involving Station Manager Lawlor with any other officer  
 13 in the room about the whereabouts at that time of the  
 14 Fire and Rescue Service appliances and crews that had  
 15 been mobilised?  
 16 A. No, sir.  
 17 Q. So did anybody make you aware at that point that  
 18 specialist and non-specialist Fire and Rescue Service  
 19 appliances and crews and the NILOs from the GMFRS were  
 20 arriving at Manchester Central Fire Station?  
 21 A. No, sir.  
 22 Q. Did you hear any discussion about how they were to be  
 23 deployed?  
 24 A. No, sir.  
 25 Q. Or whether a forward command point had been identified

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1 for them?  
 2 A. No, sir.  
 3 Q. Did you overhear Superintendent Hill from Greater  
 4 Manchester Police, at about 00.15, say to Station  
 5 Manager Lawlor, "You're aware Operation Plato has been  
 6 declared"?  
 7 A. I didn't hear any conversation, sorry.  
 8 Q. No need to apologise, Mr Randall. But you didn't hear  
 9 any conversation?  
 10 A. No, sir.  
 11 Q. It is the case, isn't it, that you were responsible for  
 12 recording on the incident log FWIN2524, the main log,  
 13 the fact that Operation Plato had been declared?  
 14 A. Yes, sir, I put it on.  
 15 Q. At the time when you did that, did you appreciate the  
 16 significance of Operation Plato in the context of what  
 17 was taking place at that time?  
 18 A. As I said on Friday, sir, I wasn't aware, really, of  
 19 what Operation Plato was.  
 20 Q. Do you agree that, from the point of view of the FDS,  
 21 there was no operational reason why the information that  
 22 had been recorded on the log that Operation Plato had  
 23 been declared should not have been conveyed to  
 24 Fire Control?  
 25 A. No, sir.

1 Q. Based on your experience as an FDS, might there be  
 2 a number of possible explanations for why that  
 3 information was not passed on to Fire Control?  
 4 A. I don't know why it wasn't, sir.  
 5 Q. Can I put these possibilities to you, based on your  
 6 experience? I'm not asking you to speculate or guess,  
 7 but based on your experience in that control room where  
 8 you were regularly working.  
 9 First of all, in a situation like this, the log is  
 10 constantly being updated, isn't it?  
 11 A. Yes, sir.  
 12 Q. And in a situation like this, is it possible for control  
 13 room operators to miss information when trying to update  
 14 a third party?  
 15 A. Yes, sir.  
 16 Q. Secondly, do you agree that it may be very difficult for  
 17 any control room operator to be expected to pass every  
 18 single piece of information to another agency from an  
 19 incident log like this, which is being constantly  
 20 updated?  
 21 A. Yes, sir.  
 22 Q. And is it possible also, based on your experience, that  
 23 the significance of the declaration of Operation Plato  
 24 may not have been appreciated by all of the control room  
 25 operators?

1 A. Yes, sir.  
 2 MR SMITH: Thank you, Mr Randall, that's all I have to ask  
 3 you.  
 4 MR DE LA POER: Next can I call on, please, Ms Johnson on  
 5 behalf of Greater Manchester Combined Authority.  
 6 Questions from MS JOHNSON  
 7 MS JOHNSON: Mr Randall, you say in your first statement, in  
 8 paragraph 7, but I don't need to take you to it, that in  
 9 effect the FDS and your team is the link between the FDO  
 10 and external agencies, including GMFRS. And we also  
 11 know from your statement that you had done training  
 12 before the incident in JESIP that included training  
 13 alongside GMFRS.  
 14 A. Yes, ma'am.  
 15 Q. So was it your understanding from that training that  
 16 JESIP involved communication between the police and the  
 17 Fire Service in an incident such as that that happened  
 18 on 22 May 2017?  
 19 A. I believe so, yes.  
 20 Q. In the time after detonation when you were fulfilling  
 21 the role of FDS, did you give any thought to whether  
 22 there should be any contact between the FDO's team and  
 23 the Fire Service?  
 24 A. I'd already seen it on the log that the Fire Service was  
 25 already informed because of the log number on GMP's log

1 itself.  
 2 Q. So you knew that the Fire Service were aware of the  
 3 incident but I was asking you a slightly different  
 4 question. Did you give any thought to whether there  
 5 should be contact between the team you were working  
 6 within and the Fire Service about the incident?  
 7 A. Not at that time, no.  
 8 Q. Was there any discussion between you and Mr Sexton about  
 9 the Fire Service at all whilst you were fulfilling the  
 10 role of FDS?  
 11 A. No, ma'am.  
 12 Q. On the night of the incident there was a call between  
 13 the GMP control room and North West Fire Control that  
 14 ran between 22.34 and 23.02. Did you have any knowledge  
 15 of that call whilst it was ongoing? It was a period of  
 16 almost half an hour.  
 17 A. No, ma'am.  
 18 Q. So you might have already answered this, but let's just  
 19 check for certainty. That call was terminated at 23.02  
 20 and the North West Fire Control log notes it was  
 21 terminated because the police operator advised they  
 22 would clear the line because Silver control was taking  
 23 over. Do you know who within GMP gave the instruction  
 24 to clear the line for Silver control to take over?  
 25 A. No, ma'am.

1 Q. The second topic I wanted to ask you about was setting  
 2 up Silver control. There should be a representative of  
 3 GMFRS at the GMP Silver control for an incident such as  
 4 this, shouldn't there?  
 5 A. Yes.  
 6 Q. Before you left the OCR when you knew you were going to  
 7 set up Silver control, you contacted a range of people  
 8 to let them know you were doing this and to request that  
 9 they attend, didn't you?  
 10 A. The communications staff, yes.  
 11 Q. Was it part of your role to contact GMFRS and request  
 12 their attendance or to arrange for somebody else to  
 13 contact them?  
 14 A. No.  
 15 Q. Whose role did you consider that it was to make that  
 16 contact?  
 17 A. I believe it was -- with an incident like this, they  
 18 usually just arrive at Silver control or the NILO  
 19 usually tries to get through to the force duty officer,  
 20 just to confirm what his...  
 21 Q. So you didn't consider it was the role of the -- sorry,  
 22 do continue, Mr Randall.  
 23 A. No, ma'am, I didn't speak to the NILO at all, I didn't  
 24 call them, no.  
 25 SIR JOHN SAUNDERS: I'm sorry to interrupt, Ms Johnson.

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1 Don't they need to know when you have set it up? You  
 2 said you just expect them to turn up.  
 3 A. Yes.  
 4 SIR JOHN SAUNDERS: But they need to know it has been set up  
 5 in order to turn up?  
 6 A. I believe so, yes, sir.  
 7 SIR JOHN SAUNDERS: So who tells them that?  
 8 A. I believe it's a text message or something like that  
 9 that gets sent out and then all the partner agencies and  
 10 other agencies, like the council, get that text at the  
 11 time, I believe.  
 12 SIR JOHN SAUNDERS: You're in charge of setting up Silver  
 13 control, you're the one who knows when it's ready to go,  
 14 so who does the sending out of the text?  
 15 A. I believe it's the specialist operations unit, sir.  
 16 SIR JOHN SAUNDERS: Who are in Silver control with you?  
 17 A. They are, yes.  
 18 SIR JOHN SAUNDERS: Okay. Thank you, Ms Johnson.  
 19 MS JOHNSON: So from that, was it your understanding that  
 20 the contact wouldn't be made with the NILO until Silver  
 21 had been set up for that message to be generated?  
 22 A. I don't understand where you're... I wouldn't have  
 23 contacted the NILO, sorry.  
 24 Q. You wouldn't have contacted the NILO and, as  
 25 I understand the answers to the questions you have just

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1 been asked by the chair, your understanding was that the  
 2 message to attend wouldn't go out until Silver control  
 3 was set up? Is that right or have I misunderstood you?  
 4 A. When we open the control room with the Silver staff, the  
 5 NILOs are usually either there or on the way.  
 6 Q. All right. I think we'll leave that issue there and  
 7 move on to the third topic, methods of contact between  
 8 GMP and GMFRS from the OCR.  
 9 Stepping back to the period before you went to  
 10 Silver control, you say in your first statement --  
 11 I don't think I need to take you to it but for reference  
 12 it is paragraph 15 -- that whilst on duty your primary  
 13 means of -- if you want to turn it up, please do.  
 14 Do you have it?  
 15 A. I do.  
 16 Q. You say there that whilst on duty, your primary means of  
 17 communication is normally through the OCR landline  
 18 telephones.  
 19 A. Yes.  
 20 Q. You then go on to describe that you would only use the  
 21 radio for pursuits and other high-priority fast-paced  
 22 FWINs, and then you describe why that would be. So as  
 23 I understand it, the primary method of contact was  
 24 landline telephones and the description you give in that  
 25 statement of using the radio to contact other people

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1 seemed to be descriptions of contact within the police;  
 2 is that right?  
 3 A. It is.  
 4 Q. And it's right, isn't it, that contact with GMFRS was  
 5 normally via the landlines?  
 6 A. It was.  
 7 Q. Did you hear the evidence of Mr Sexton?  
 8 A. Part of it, ma'am, yes.  
 9 Q. On the first day of his evidence he was asked some  
 10 questions by Mr Greaney about methods of contacting  
 11 GMFRS. Do you know whether you heard that part of his  
 12 evidence?  
 13 A. I couldn't remember.  
 14 Q. All right. Let me summarise the evidence I'm referring  
 15 to and see if it jogs your memory. Mr Greaney asked him  
 16 some questions about methods of contacting GMFRS and  
 17 Mr Sexton said in relation to the radio that there were  
 18 a number of additional channels that could be used but  
 19 there would need to be agreement about which channel,  
 20 that it wasn't common practice, and it would be Silver  
 21 command who would set them up. He then went on to say,  
 22 from a practical perspective, that GMP didn't use those  
 23 additional channels to contact GMFRS at the time of the  
 24 incident. Did you hear that evidence?  
 25 A. I think I did, ma'am, yes.

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1 Q. And do you agree with what he said?  
 2 A. Part of it. The channels that you're describing would  
 3 have had to be -- the Fire Service would have had to be  
 4 informed that they were going to be used prior to anyone  
 5 monitoring them and using them.  
 6 Q. So they had to be given a channel and what Mr Sexton  
 7 said about it was that, before 22 May 2017, in reality  
 8 it wasn't a process that was used. Do you agree with  
 9 that part of his evidence?  
 10 A. I do.  
 11 Q. In your fourth statement you mention the Hailing channel  
 12 that we've heard some evidence about and you've been  
 13 asked some questions about it. You told Mr de la Poer  
 14 that you yourself had never used the Hailing channel.  
 15 Do you have any direct experience of the Fire Service  
 16 Hailing channel ever having been used prior to this  
 17 incident?  
 18 A. In what sense? The shared Hailing group that we're  
 19 talking about?  
 20 Q. Any experience of the Fire Service using a Hailing  
 21 channel to contact GMP. Do you have any experience of  
 22 that prior to this incident?  
 23 A. No.  
 24 Q. I'm assuming that you don't have any knowledge of what  
 25 setting up the Hailing channel would involve from the

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1 perspective of other agencies?  
 2 A. The Hailing group and the shared Hailing group are  
 3 monitored by the radio staff in front of me and the  
 4 force duty officer at the time, and then the other three  
 5 channels that you were describing, they would have to be  
 6 agreed to be used. We used to test them in the control  
 7 room and that's to see if the Fire Service and the  
 8 Ambulance Service were on them channels to confirm that  
 9 they're hearing the test calls. So I have had some  
 10 experience with the tests but that's --  
 11 SIR JOHN SAUNDERS: It has been tested but never used?  
 12 A. Yes, sir.  
 13 MS JOHNSON: Did you hear the evidence of Chief Inspector  
 14 Booth?  
 15 A. No, ma'am.  
 16 Q. He was asked a number of questions about methods of  
 17 contacting GMFRS, both from the police to GMFRS and  
 18 GMFRS to the police. He didn't mention the option of  
 19 the Hailing channel. Does that surprise you?  
 20 A. Yes, it does.  
 21 Q. Why does it surprise you?  
 22 A. In the control room, the staff know and Mr Booth was  
 23 a previous FDO, so he should have known about the shared  
 24 Hailing groups and the Hailing groups.  
 25 Q. Finally on this topic of methods of communication

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1 I wanted to ask you about the red phone that you've  
 2 mentioned in your fourth statement. If you want to turn  
 3 up what you say about it, it's in paragraph 22 of your  
 4 fourth statement. You describe it as:  
 5 "As well as a direct line, the FDO also had access  
 6 to a separate back-up telephone line. This telephone  
 7 line was known as 'the red phone' because prior to some  
 8 refurbishment work the handset was red. The line was  
 9 not used for outgoing calls and was rarely called by  
 10 others as it was a back-up line. However, some GMFRS  
 11 NILOs would occasionally use it to contact the FDO."  
 12 Are you saying that this was a line that was  
 13 specific for the Fire Service or was it a line that was  
 14 available to other agencies as well?  
 15 A. It was just a telephone line in on the desk between the  
 16 FDO and the FDS.  
 17 Q. So it was available to anybody that had its number?  
 18 A. Yes, ma'am.  
 19 Q. I don't want you to -- I'm sure you wouldn't be able  
 20 to -- give any numbers. Do you know what the number for  
 21 that line would be?  
 22 A. Yes.  
 23 Q. So if necessary, if you were asked to provide it, you  
 24 could do?  
 25 A. Yes, I could do that now, yes.

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1 Q. You say that some GMFRS NILOs would occasionally use it  
 2 to contact the FDO. Do you have any NILOs in mind who  
 3 used to use this number?  
 4 A. No, I don't, sorry.  
 5 Q. You don't give any examples of occasions on which it was  
 6 used. Do you have any examples in mind of occasions  
 7 when NILOs used it to contact the FDO?  
 8 A. I don't know if it was prior to the incident itself, but  
 9 afterwards, the NILOs do use it if they can't get  
 10 through to the FDO line. If their fire crews were going  
 11 to do, say like an installation of a smoke alarm, they'd  
 12 ask GMP if there was any issues with the address and if  
 13 they couldn't get through, they'd phone that line and  
 14 it would be answered.  
 15 SIR JOHN SAUNDERS: Do you remember anyone using it on  
 16 22 May?  
 17 A. No, sir.  
 18 MS JOHNSON: Do you remember anyone using it prior to  
 19 22 May? You said you have recollections of it being  
 20 used after the event.  
 21 A. It has been used, I believe, before the event, but  
 22 I don't know (overspeaking), sorry.  
 23 Q. Sorry, I lost that last answer. Could you just repeat  
 24 what you said?  
 25 SIR JOHN SAUNDERS: "Don't know whether it was the Fire

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1 Service who used it.”  
 2 MS JOHNSON: Thank you. I was hoping that we could put up  
 3 a document that’s not on the evidence proposal but that  
 4 we did bring to the inquiry legal team’s attention last  
 5 week, it’s {INQ032678/1}.  
 6 Could I ask to scroll down to the final page --  
 7 penultimate page, {INQ032678/3}. If we could just look  
 8 at the lower email first of all. This is an email that  
 9 was sent from Chris Hill to Michael Booth, so  
 10 Chief Inspector Booth, after the attack. It’s dated  
 11 2 October 2017. We can see here:  
 12 "Mike, spoke with Dale last night. He suggests  
 13 there was a direct line to FDO that CC used to sue, a  
 14 bit like a red phone, that’s not really used any more.  
 15 Do you know the number and if used and if we can give to  
 16 fire and ambulance so can get through during an  
 17 incident?"  
 18 Then, if we could look at the reply above that, it’s  
 19 on the same page at the top of the page:  
 20 "Sir, the line was taken out some time ago. If we  
 21 get [and then there’s a reference to a channel] right,  
 22 then what do they want this line for? Sounds just like  
 23 a belt and braces to me and it would just be another  
 24 phone ringing in the office that might not get answered.  
 25 But for absolute emergencies then we do have the FDO

1 mobile that we could share with the ILOs.”  
 2 Then if we could go up to the page {INQ032678/2}  
 3 above. We can see the response to that, 3 October:  
 4 "Let’s go with a mobile then, is that okay? What is  
 5 the best way to do it? Who has the number now? Will  
 6 FDOs answer it, ie do we need quick emails saying need  
 7 to answer it, et cetera, et cetera?"  
 8 If we could take that down. I understand that you  
 9 were shown this email last week; is that right?  
 10 A. I was.  
 11 Q. And does it seem that this email is referring to the red  
 12 phone that you refer to in your fourth statement?  
 13 A. I believe it might be, yes.  
 14 Q. This email was sent some months after the arena attack,  
 15 but still in 2017, so about 4 months later, and it would  
 16 certainly appear to have been the understanding of  
 17 Chief Inspector Booth that the line had been taken out  
 18 some time ago. Have you taken any steps to satisfy  
 19 yourself that this red phone line was in use and able to  
 20 be used in May 2017?  
 21 A. The red phone -- if you’re talking about the red phone  
 22 itself, that wasn’t there, but this telephone that was  
 23 on the desk was there in 2017.  
 24 Q. Right. Just to break that down, I appreciate there  
 25 wasn’t physically a red phone any more, but that’s what

1 it was referred to, it was a reference to the line.  
 2 This email from October 2017 (inaudible: distorted) the  
 3 line was taken out some time ago. You have just said to  
 4 me that you think these emails are referring to the line  
 5 that you are talking about in your fourth statement.  
 6 A. Yes.  
 7 Q. My question to you was whether you had taken any steps  
 8 to investigate whether you’re confident that this line  
 9 was in use and able to be called in May 2017, bearing in  
 10 mind what Chief Inspector Booth says in this email?  
 11 A. The telephone was there. I don’t know if anyone had the  
 12 number for it.  
 13 MS JOHNSON: All right. Thank you very much, those are my  
 14 questions.  
 15 SIR JOHN SAUNDERS: Before we have any more questions, the  
 16 aim of setting up Silver command is that Silver command  
 17 will take over running the operation, running the  
 18 emergency, from the FDO; is that right or not?  
 19 A. I think the Silver commander runs the response and  
 20 anything to do with it, sir.  
 21 SIR JOHN SAUNDERS: Okay. So it takes over the armed police  
 22 exercise?  
 23 A. I think that’s in conjunction with the other commanders  
 24 that were in the room at the time. I think he’s got  
 25 overall responsibility.

1 SIR JOHN SAUNDERS: So you are there by what sort of time  
 2 ready to go in Silver command with it all set up?  
 3 A. I arrived at about 11.40, sir.  
 4 SIR JOHN SAUNDERS: And you got it set up by?  
 5 A. The radio staff were all sat down, I think we...  
 6 I think the radios were getting everything done and  
 7 I think it was just after about 12 o’clock, just after.  
 8 SIR JOHN SAUNDERS: So from about midnight you in Silver  
 9 command were ready to go?  
 10 A. I believe so, yes.  
 11 SIR JOHN SAUNDERS: So when did you actually take over in  
 12 Silver command running the operation?  
 13 A. I couldn’t really tell you without looking through when  
 14 I had a conversation that we were ready to take it from  
 15 the district channel, sir?  
 16 SIR JOHN SAUNDERS: About how long after midnight?  
 17 A. About half past, something like that.  
 18 SIR JOHN SAUNDERS: And you’re waiting for what?  
 19 A. Just waiting for the Silver commander to brief us that  
 20 we’re ready to take over and ready to move everyone over  
 21 to this channel.  
 22 SIR JOHN SAUNDERS: And that was Superintendent Hill?  
 23 A. Yes, sir.  
 24 SIR JOHN SAUNDERS: So you have to wait for him to arrive,  
 25 he then briefs you and says, "Right, we’re ready to go"?

1 A. Yes.  
 2 SIR JOHN SAUNDERS: And we think that's about 12.30?  
 3 A. I think so, sir.  
 4 SIR JOHN SAUNDERS: One of the important commanders at this  
 5 stage would be the tactical firearms commander; is that  
 6 right.  
 7 A. Yes, sir.  
 8 SIR JOHN SAUNDERS: Would he be in the Silver command as  
 9 well, or she, or operating from elsewhere but doing it  
 10 through Silver command?  
 11 A. I believe so, yes.  
 12 SIR JOHN SAUNDERS: I was trying to give you two  
 13 alternatives. Did the TFC need to be there in the room  
 14 with you or was -- I think it was a he who actually did  
 15 it in the end -- he --  
 16 A. Yes, he was in the room, sir. He arrived in the room.  
 17 SIR JOHN SAUNDERS: And when did he arrive?  
 18 A. I couldn't tell you what time he arrived, sir.  
 19 SIR JOHN SAUNDERS: Right. You really need, don't you, the  
 20 Silver commander in there, you need the tactical  
 21 firearms commander in there or at least in close contact  
 22 with you?  
 23 A. Yes, sir.  
 24 SIR JOHN SAUNDERS: And then hopefully representatives from  
 25 the other rescue organisations --

25

1 A. Yes, sir.  
 2 SIR JOHN SAUNDERS: -- if they got the text?  
 3 A. I believe so, yes.  
 4 SIR JOHN SAUNDERS: What about BTP?  
 5 A. They arrived in the room also, sir, a representative  
 6 from BTP.  
 7 SIR JOHN SAUNDERS: About when, do you know?  
 8 A. I couldn't say, sir.  
 9 SIR JOHN SAUNDERS: We can find all these times out. Was  
 10 that the result of a text as well?  
 11 A. No, sir, I couldn't say why they arrived --  
 12 SIR JOHN SAUNDERS: They just turned up?  
 13 A. Yes, they just turned up, sir. I don't know if they was  
 14 told to --  
 15 SIR JOHN SAUNDERS: When you're ready to go you then say to  
 16 the FDO, "Right, we're taking over"?  
 17 A. Yes, sir.  
 18 SIR JOHN SAUNDERS: Thank you.  
 19 MR DE LA POER: Next then, please, Mr Weatherby, Queen's  
 20 Counsel.  
 21 Questions from MR WEATHERBY  
 22 MR WEATHERBY: I only have a few questions for you on behalf  
 23 of the families. May I first of all indicate that there  
 24 will be no criticism of you implied in any of those  
 25 questions. I'm really just going to ask you to help

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1 draw a few threads together, okay?  
 2 A. Yes, sir.  
 3 Q. Just picking up a point that the chair asked you about  
 4 earlier this morning, and that's the location of,  
 5 I think, the FDO, probably the FDO and the FDS, and the  
 6 importance of being located near to the Silver command  
 7 room. You agreed that it was important that they were  
 8 located close to the Silver command room and that's what  
 9 in fact occurs now. Have I understood that all  
 10 correctly?  
 11 A. The Silver control was at the time separate, in  
 12 a separate building from the FDO and FDS where now they  
 13 are in the same building, on different floors but in the  
 14 same building.  
 15 Q. The chair was asking you about the 20-minute delay  
 16 between somebody, you here, travelling between one and  
 17 the other and you agreed that it was important that they  
 18 were co-located and that in fact that happens now?  
 19 A. It does, yes.  
 20 Q. Am I right that at the time, on the 22 May, this issue  
 21 of co-location of the FDO and FDS and the Silver command  
 22 room was very much a live issue at that time?  
 23 A. What do you mean, sorry? A live issue?  
 24 Q. Were you aware that this was being talked about and  
 25 there were various plans to co-locate the FDO and FDS

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1 positions with the Silver command room?  
 2 A. They were going to be in the same building, I believe,  
 3 but wasn't going to be on the same floor.  
 4 Q. I'm sorry, I'm not making myself clear. Am I right that  
 5 at 22 May there were discussions and plans to put the  
 6 FDO and FDS in close proximity in the same building to  
 7 the Silver command room but those plans had not in fact  
 8 been put into place?  
 9 SIR JOHN SAUNDERS: Okay, Mr Weatherby, I think you're again  
 10 at slightly cross-purposes. What the witness said in  
 11 answer to that was: yes, there were plans to co-locate  
 12 in the same building, but at that stage the plan would  
 13 be to be on separate floors.  
 14 MR WEATHERBY: Yes.  
 15 SIR JOHN SAUNDERS: So not that close in the same building,  
 16 as I understand it.  
 17 A. It was two floors down, sir.  
 18 SIR JOHN SAUNDERS: But now they're on the same floor?  
 19 A. No, still two floors down.  
 20 SIR JOHN SAUNDERS: Still two floors down?  
 21 MR WEATHERBY: That's my fault. I wasn't clear enough by  
 22 what I meant by co-locate. The discussions at the time,  
 23 the plans at the time and the reality now is the FDO and  
 24 FDS are located within a minute or two of the Silver  
 25 command room in terms of travel from one to the other;

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1 is that right?  
 2 A. It is.  
 3 Q. At that time when these discussions and plans were  
 4 taking place, were you, as supervisor in the OCR, asked  
 5 for your view? Were you consulted about whether this  
 6 would be a good idea or not?  
 7 A. Yes, sir, we was.  
 8 Q. And at the time, prior to 22 May, did you express a view  
 9 that it would be a good idea?  
 10 A. Yes, I did.  
 11 Q. Thank you. I'll move on in a second, but can you tell  
 12 us, with the 22 May as the focal point, about how long  
 13 before were you consulted about this? Would it have  
 14 been a year before, 6 months before?  
 15 A. I can't remember, sir. There were ongoing discussions  
 16 regarding the movement of Team 3 and the FDO and the FDS  
 17 to headquarters. It was just bantered around, plans.  
 18 That's all we got told and we were just waiting for the  
 19 senior officers to make the decision. It wasn't our  
 20 decision to make as FDSs.  
 21 Q. Yes. That's very helpful. I'll move on.  
 22 On Friday you told us you'd not seen the Plato or  
 23 major incident Greater Manchester Police plans and  
 24 therefore it follows that you had had no training on  
 25 either; is that right?

29

1 A. Yes, sir.  
 2 Q. You also told us that you had an idea that Plato was to  
 3 do with terrorism but beyond that you didn't really know  
 4 what it was.  
 5 A. Yes, sir.  
 6 Q. At the time, 22 May, have I understood your evidence  
 7 correctly, that you had no action cards, no crib sheet,  
 8 no aide-memoire, to tell you as FDS, or any of the staff  
 9 that you were supervising, what to do if Plato was  
 10 declared?  
 11 A. No, sir, there were no cards available on that evening.  
 12 Q. What about a major incident? Did you have any action  
 13 cards or crib sheets or anything like that for if  
 14 a major incident was declared?  
 15 A. No, sir.  
 16 Q. When the reports of the bombing came through, would it  
 17 be right that you immediately knew as an experienced  
 18 supervisor that this was potentially a serious and  
 19 significant incident and therefore it should be referred  
 20 to the FDO straightaway?  
 21 A. Yes, sir.  
 22 Q. Could you just help us with how that happens? A report  
 23 comes through to a call handler or a radio operator and  
 24 do you see that straightaway or do they shout you and  
 25 say, "Boss, we've got something serious or potentially

30

1 serious"? How does that happen?  
 2 A. When the call-taker takes a call and inputs it on the  
 3 system, once they start putting information on it from  
 4 the second page, they should then switch it to the  
 5 supervisor where the area is covering, the force duty  
 6 officer and the force duty supervisor and anyone else  
 7 that really needs to know about it.  
 8 Q. That's a commonsense judgement of the call handler or  
 9 radio operator?  
 10 A. It is.  
 11 Q. If they're in any doubt, given the proximity in the  
 12 room, they would call you, would they, and ask you,  
 13 "Shall I transfer this"?  
 14 A. No, sir, the call handlers were in a separate building  
 15 on the evening so with what was going on and what was  
 16 explained to the call handler, they would have  
 17 automatically switched it to the supervisor covering  
 18 that district and the force duty supervisor and the  
 19 force duty officer.  
 20 SIR JOHN SAUNDERS: So these are call handlers who take all  
 21 the 999 calls?  
 22 A. Yes, sir.  
 23 SIR JOHN SAUNDERS: And they are not in the same place as  
 24 you?  
 25 A. No, sir.

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1 SIR JOHN SAUNDERS: But they would switch it through to you?  
 2 A. Yes, sir.  
 3 MR WEATHERBY: The judgement is down to them and they are  
 4 trained to err on the side of caution, are they?  
 5 A. Yes. They would make an assessment and, with an  
 6 incident like that, with what they were told, they would  
 7 have switched it, sir.  
 8 Q. And that's what happened, so it was a call handler who  
 9 switched it, switched this particular report or the  
 10 start of the report to you and Mr Sexton?  
 11 A. Yes, sir.  
 12 Q. Thank you. That's made that much clearer.  
 13 As an experienced supervisor, you would be able to  
 14 manage aspects of any report that comes to you without  
 15 much guidance and your role would include supervising  
 16 radio operators and call handlers; is that right?  
 17 A. As a force duty supervisor, you just supervise your team  
 18 of Team 3 radio operators, the CK channel, and the  
 19 Information Management Unit team.  
 20 Q. And then beyond the matters which might be obvious to  
 21 you, beyond that you are working under the direction of  
 22 Mr Sexton, the FDO, who was sat next to you?  
 23 A. Yes, sir.  
 24 Q. So you were simply following his directions as to what  
 25 to do?

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1 A. Yes, sir .  
 2 Q. And that continued until you went to HQ and you went to  
 3 HQ under his direction?  
 4 A. Yes, sir .  
 5 Q. Correct me if I'm wrong, but Mr Sexton gave you a list  
 6 of people to contact and you worked through those  
 7 people; is that right?  
 8 A. Yes, sir .  
 9 Q. His instruction to you was simply to alert those people  
 10 about what appeared to be happening about the bombing?  
 11 A. Yes, sir .  
 12 Q. And with one of them, the NPAS, to ask that the  
 13 helicopter be put on standby?  
 14 A. Yes, sir .  
 15 Q. So you spoke to Superintendent Nawaz, Chief Inspector  
 16 Buckle, NPAS, the press office, the senior investigating  
 17 officer, Denise Worth, and that would be to start the  
 18 criminal side of dealing with this issue; is that right?  
 19 A. I believe it is, sir .  
 20 Q. And then also you contacted Laura Lewis, who was the  
 21 force command module manager; is that right?  
 22 A. It is, sir, yes.  
 23 Q. Have I missed anybody out on that list of people you  
 24 contacted on the direction of Mr Sexton?  
 25 A. That was pretty much the list -- and phone calls coming

1 in, because when I spoke to Mr Nawaz, I took force duty  
 2 officer's line and spoke to Mr Nawaz again.  
 3 Q. And you contacted Laura Lewis because you knew that the  
 4 Silver room would be set up and she was the person that  
 5 might be able to help with staffing it, is that right,  
 6 bringing extra staff in?  
 7 A. Yes. It was different staff from the control room, sir.  
 8 Q. So you could take staff that you thought were  
 9 appropriate from the OCR, but you needed other staff and  
 10 Laura Lewis was the contact to put that into train?  
 11 A. Yes, sir .  
 12 Q. Before you left the OCR, obviously you were leaving your  
 13 seat and somebody else was taking over and that was  
 14 Sergeant Core; yes?  
 15 A. Yes.  
 16 Q. Again, that was Mr Sexton's decision. Did you do  
 17 a handover to Sergeant Core before you left?  
 18 A. I give him as much information as I did, where we were  
 19 up to, who I had contacted.  
 20 Q. It's just that shortly after you left, I don't think we  
 21 need to turn it up, but on the dictaphone of Mr Sexton,  
 22 shortly after you left, Sergeant Core was asking where  
 23 the RVP was. Before you left, do you recall handing  
 24 over details like that to him?  
 25 A. No, sir .

1 Q. You went to the Silver control room and Mr de la Poer  
 2 referred you to a checklist on the major incident plan,  
 3 but of course you'd not seen that plan before, so you  
 4 hadn't seen that checklist, had you?  
 5 A. No, sir .  
 6 Q. At the Silver command, were there any action cards or  
 7 aide-memoires or any prompts, notes of any description  
 8 about what you were to do at the Silver command room?  
 9 A. No, sir .  
 10 Q. So essentially, as we've heard, you allocated radio  
 11 operators to particular computers, made sure they were  
 12 set up, made sure they were reading in, by which I think  
 13 you mean reading the relevant FWINS; is that right?  
 14 A. Yes, sir, it was.  
 15 Q. Beyond that, given that there was no checklist,  
 16 am I right that you were then working to somebody else's  
 17 direction, like you had been in the OCR?  
 18 A. Yes, sir. So the other partner agencies come in, so  
 19 they'll be shown to where they are seated or where their  
 20 positions were, and then the Silver commander, if he  
 21 needs anything from the communication team, I'll do that  
 22 towards my communications staff.  
 23 Q. So the basic tasks of getting your staff sat down and  
 24 started and troubleshooting any computer problems or  
 25 whatever was your role. You were then to take other

1 agency commanders to where they were to be located and  
 2 then you were to work to whoever was your effective line  
 3 manager on the night in the Silver command room; is that  
 4 right?  
 5 A. That's right.  
 6 Q. So on arrival, you said you got there at about 11.40.  
 7 Am I right that, having contacted the people that we've  
 8 already been through, you would have been expecting to  
 9 see Superintendent Nawaz; would that be right?  
 10 A. Yes, sir .  
 11 Q. Have I understood your evidence that not only was  
 12 Superintendent Nawaz not there when you got there, but  
 13 you didn't see him at all that night; is that right?  
 14 A. He wasn't there when I arrived, sir. I don't know if he  
 15 turned up in the room. I was just extremely busy and --  
 16 Q. You didn't see him?  
 17 A. No, sir .  
 18 Q. Chief Inspector Buckle, who you'd also spoken to on the  
 19 radio, I think --  
 20 A. Telephone, sir .  
 21 Q. Telephone, sorry. When you got there, was she at the  
 22 Silver command room?  
 23 A. I couldn't possibly say if she was or not at the time.  
 24 Q. Right. Is that because you can't remember or for some  
 25 other reason?

1 A. I just can't remember, sir.  
 2 Q. Okay. But in the absence of Mr Nawaz, if she had been  
 3 there, would you not have gone to her and said, "What  
 4 do you want me to do?"  
 5 A. Probably, yes, sir .  
 6 Q. You just don't recall that?  
 7 A. I don't recall , sorry .  
 8 Q. No problem. Then as I think the chair put to you  
 9 earlier , Mr Hill then arrived at some point, but you  
 10 can't remember when?  
 11 A. Yes.  
 12 Q. And took over as Silver commander; is that right?  
 13 A. It is , sir .  
 14 Q. Essentially , did you work to his direction ?  
 15 A. Yes, sir .  
 16 Q. Finally this: you've been Silver room manager on  
 17 a number of occasions prior to this date but only ever  
 18 on planned, pre-planned operations; that's right,  
 19 I think, isn't it? There was no plan and there had been  
 20 no exercises that you'd been involved in as to setting  
 21 up a spontaneous incident at the Silver command room?  
 22 A. No, sir .  
 23 Q. And no direction as to who should do what if  
 24 a spontaneous incident occurred?  
 25 A. No, sir .

1 MR WEATHERBY: Thank you very much. Those are my questions.  
 2 SIR JOHN SAUNDERS: Thank you, Mr Weatherby.  
 3 MR DE LA POER: Sir, before I invite questions from  
 4 Mr Horwell, can I just give you some times. Some are  
 5 provisional , some have been established by the evidence  
 6 so far .  
 7 SIR JOHN SAUNDERS: Thank you very much.  
 8 MR DE LA POER: I anticipate we will hear later today from  
 9 former Chief Inspector Buckle, who was the cadre  
 10 tactical firearms commander. Her arrival at the force  
 11 HQ Silver room was 23.18. That is approximately  
 12 concurrent with Assistant Chief Constable Ford, as she  
 13 then was, in the same place.  
 14 Superintendent Hill records in his statement that he  
 15 took over from Superintendent Nawaz as Silver at about  
 16 midnight having arrived at force headquarters at just  
 17 before midnight.  
 18 Superintendent Thompson is recorded as arriving some  
 19 time around 23.50, with the formal handover between him  
 20 and Inspector Sexton, as he was, at 00.17. We heard  
 21 that from Chief Inspector Sexton when he gave evidence.  
 22 SIR JOHN SAUNDERS: Okay. And there's a handover before  
 23 that from Chief Inspector Buckle to  
 24 Superintendent Thompson?  
 25 MR DE LA POER: I'm not sure it technically would be right

1 to describe it as a handover, although we'll hear from  
 2 the witnesses, because Chief Inspector Buckle never took  
 3 on the role of tactical firearms commander formally  
 4 because following a conversation between her and  
 5 Superintendent ---  
 6 SIR JOHN SAUNDERS: So the FDO carried on?  
 7 MR DE LA POER: Indeed, yes.  
 8 SIR JOHN SAUNDERS: My mistake.  
 9 MR DE LA POER: Mr Horwell indicates I've got that right.  
 10 Can I now invite him to ask his questions?  
 11 Questions from MR HORWELL  
 12 MR HORWELL: Sir, in relation to one question you asked  
 13 Mr Randall in relation to the relocation of the OCR,  
 14 Mr Pilling has dealt with that in his third witness  
 15 statement. If I can summarise a number of paragraphs in  
 16 one sentence: relocating the OCR to force headquarters  
 17 was a significant challenge in terms of both cost and  
 18 difficulty . It was, as you well know, sir, eventually  
 19 done. So there was a long history .  
 20 SIR JOHN SAUNDERS: Thank you.  
 21 MR HORWELL: Just in terms of timings, Mr Randall, I'm  
 22 reading from the communication schedule. I know you've  
 23 seen it , it's not something that we can put on the  
 24 screen, but at 00.15, you had a telephone conversation  
 25 with Mr Sexton. You said to him:

1 "They're ready to --- Silver is ready to take over so  
 2 they can change."  
 3 I'm leaving that word out in case it's sensitive .  
 4 In that same telephone conversation:  
 5 "We're ready to take it now over to Silver control."  
 6 Then Sexton:  
 7 "You're ready to take in from Silver control. Yeah,  
 8 I'll let --- Andy will let them know."  
 9 And you said:  
 10 "Thanks a lot, boss."  
 11 Mr Sexton said:  
 12 "Cheers, bye."  
 13 And you said:  
 14 "I'll see you in the morning, bye."  
 15 Does that look as if that is the handover?  
 16 A. From the handover from the district channel to the  
 17 Silver control, yes.  
 18 Q. Is that when Silver control was set up or would that be  
 19 at another time? And by set up, Mr Randall, we mean  
 20 actually running.  
 21 A. Yes, it's ready to go, so all the patrols from the  
 22 district Talk Group can change to the other Talk Group  
 23 where we were dealing with it in Silver control.  
 24 Q. So is that the time at which Silver control took over?  
 25 A. It was, yes.

1 Q. So that's quarter past midnight. And as we know, some  
 2 40 seconds later, so still at quarter past midnight,  
 3 there is a conversation between Mr Thompson and  
 4 Mr Sexton, when Mr Thompson took over as TFC. So it all  
 5 happened, as it happened, at the same time or almost the  
 6 same time.  
 7 A. Possibly, yes.  
 8 Q. I want to ask you, please, about communications and  
 9 communications to GMP and communications from GMP. We  
 10 saw this last week, but it's a helpful reminder. Could  
 11 I ask for the schedule to be put on the screen. It's  
 12 {INQ041227/1}.  
 13 As we know, the first two entries are the Hailing  
 14 Talk Groups, the first being the police and the second  
 15 being the multi-agency, which includes, of course, fire  
 16 and NWAS. As we can see from that schedule, those two  
 17 Hailing groups are monitored by GMP 24 hours a day.  
 18 A. Yes, sir.  
 19 Q. We heard, I think it was 2 weeks ago now, about a police  
 20 directory.  
 21 A. Yes, sir.  
 22 Q. You have found the police directory that was in use  
 23 at the time of this attack?  
 24 A. Yes, sir.  
 25 Q. Could we go, please, to {INQ041232/1}.

1 This is the cover of that document. We can see, two  
 2 lines below that large section in red:  
 3 "If telephone lines fail, Airwave HG channels should  
 4 be used instead."  
 5 Is HG Hailing group?  
 6 A. It is, sir.  
 7 Q. If we go to {INQ041232/2}, please. This is the relevant  
 8 part of that directory for Greater Manchester. We can  
 9 see the individuals where telephone numbers are given  
 10 but we can also see to the left of that top heading  
 11 "Airwave A tag."  
 12 And obviously all the details have been redacted,  
 13 but the Airwave A tag, how would that be used by another  
 14 police force to contact GMP on the Hailing group  
 15 channel?  
 16 A. They'd have to... Our GMP's Airwave Talk Group, not the  
 17 actual number itself, it's the code that they should  
 18 look for in the folder, if it's a personal handset, and  
 19 then they can look through for the Hailing group.  
 20 Q. So it can all be done on one handset?  
 21 A. Yes, if it is on a handset or in the control room they  
 22 can also a handset also to get the Talk Group number.  
 23 Q. Right. Communications from GMP. Could we go back to  
 24 that schedule, please, {INQ041227/1}.  
 25 Here we look at the third and fourth descriptions:

1 "Operational multi-agency Talk Groups 1, 2 and 3."  
 2 And finally:  
 3 "Tactical multi-agency Talk Group."  
 4 I'm going to be asking you questions about that  
 5 third one down, Mr Randall, and you know that very well.  
 6 A. I do now.  
 7 Q. Could we --  
 8 SIR JOHN SAUNDERS: Does that mean he knows you're going to  
 9 ask the questions or he knows about the Talk Group?  
 10 MR HORWELL: I just want to establish, because we can't  
 11 actually describe the channel, I want him to be aware  
 12 that that is the channel about which I'm asking the  
 13 questions.  
 14 SIR JOHN SAUNDERS: Thank you.  
 15 MR HORWELL: If we go to the FDO's aide-memoire that was in  
 16 use or available for use on the night, that's  
 17 {INQ040955/1}. Could we look at that section, please,  
 18 below "JESIP GMFRS/NWAS"?  
 19 "In line with JESIP to manage communication between  
 20 each partner, one of the [and those are the three  
 21 channels I indicated on the schedule] will be nominated  
 22 by the FDO when contacting each ILO. Once nominated,  
 23 a member of Team 3 on a CK position should be tasked to  
 24 monitor this Talk Group and relay information from the  
 25 FDO and listen in for any requests. This facility will

1 allow for some degree of situational awareness between  
 2 each agency until a ground-assigned commander from each  
 3 agency have met at the forward control point to  
 4 undertake a joint risk assessment."  
 5 These three channels we know from the schedule, they  
 6 are not monitored 24 hours a day by GMP?  
 7 A. No, sir.  
 8 Q. So for that tri-service communication system to be  
 9 established, one of those three channels has to be  
 10 nominated?  
 11 A. Yes, sir.  
 12 Q. And once nominated, the fire and Ambulance Service have  
 13 to be informed?  
 14 A. Yes, sir.  
 15 Q. One of the exhibits to your statement is a force duty  
 16 cover daily sheet.  
 17 A. Yes, sir.  
 18 Q. If we could go to that. It's an example, it's not the  
 19 one that was in use on the night, Mr Randall, it's an  
 20 example. {INQ029313/1}.  
 21 Could we go to the bottom of that document, please?  
 22 Mr Randall, if you can help the chairman, please.  
 23 This is a document that is completed each day?  
 24 A. Each morning, round about 6 o'clock, by the force duty  
 25 officer.

1 Q. And does it contain the number for the GMFRS NILO?  
 2 A. It does. They usually ring around 9 o'clock in the  
 3 morning to say who's on 24-hour cover from that time,  
 4 from about 9 o'clock with their contact details.  
 5 Q. And a number to contact Nwas?  
 6 A. It is. That's just the landline into, I believe, their  
 7 control room.  
 8 Q. I was going to ask you, Mr Randall. Although it states  
 9 on the document "Nwas ILO", the number that is redacted  
 10 is in fact the number for the ambulance control room?  
 11 A. Yes, sir, I believe it's a number to their manager  
 12 in the control room.  
 13 Q. All right. There on that daily sheet are the two  
 14 numbers through which contact can be made with the fire  
 15 NILO and the Ambulance Service?  
 16 A. Yes, sir.  
 17 Q. Could we go back to the aide-memoire.  
 18 SIR JOHN SAUNDERS: This is January 2020. Was the form in  
 19 existence in May 2017?  
 20 A. It was, sir.  
 21 SIR JOHN SAUNDERS: Thank you.  
 22 MR HORWELL: It was just an example. It happened to be  
 23 there when Mr Randall (overspeaking) --  
 24 SIR JOHN SAUNDERS: Yes, I just wanted to confirm it was the  
 25 same. Thank you.

1 MR HORWELL: If we could go back to the aide-memoire,  
 2 {INQ040955/1}, please, and to that same section.  
 3 So if you had been asked to set up that link between  
 4 the three emergency services, Mr Randall, it would have  
 5 involved simply selecting one of the three numbers?  
 6 A. The channel numbers, yes, sir.  
 7 Q. It would then have involved informing fire and ambulance  
 8 which of those three channels was going to be used?  
 9 A. Yes, sir.  
 10 Q. And then, within the operations room, what is physically  
 11 required for a radio operator to then select that  
 12 channel and then monitor it?  
 13 A. If it's on their screen, they would just have to press  
 14 a button for it to be monitored.  
 15 Q. If you had been asked to do that, could you have done  
 16 that?  
 17 A. Yes, sir.  
 18 SIR JOHN SAUNDERS: How does it get on their screen? You  
 19 put it on, do you?  
 20 A. No, sir, the radio operator has a predetermined list of  
 21 Talk Groups.  
 22 SIR JOHN SAUNDERS: Right, I see. So it comes up if that's  
 23 the one that's operating?  
 24 A. Yes, sir.  
 25 SIR JOHN SAUNDERS: Okay, thank you.

1 MR HORWELL: Those three channels, which we are describing  
 2 as the operational multi-agency Talk Groups, Mr Randall,  
 3 those are the channels that were tested on Sundays?  
 4 A. Yes, sir, I believe so.  
 5 Q. We will be hearing some more evidence about the tests,  
 6 but as you were the FDS working in an operations room,  
 7 can I ask you about your knowledge of those tests. Was  
 8 your particular operations room involved in those tests  
 9 at some stage?  
 10 A. Yes, they were.  
 11 Q. Can you remember when before the attack that was and for  
 12 how long?  
 13 A. I couldn't remember when, but I know when we used to  
 14 test them and the procedure.  
 15 Q. How often were they tested? We're calling them the  
 16 Sunday morning tests, but can you remember how often  
 17 they were tested?  
 18 A. I think they were done every Sunday.  
 19 Q. And that's between GMP and...  
 20 A. The Fire Service and the Ambulance Service.  
 21 Q. What was the point of testing those channels,  
 22 Mr Randall?  
 23 A. To me, to make sure they were actually working, but we  
 24 had to inform the fire and ambulance that we were  
 25 testing them so they could listen in to them and just

1 make sure they responded on them channels itself.  
 2 Q. So the call had to be made to fire and ambulance and  
 3 then the tests could take place?  
 4 A. Yes, sir.  
 5 SIR JOHN SAUNDERS: And all three channels would be tested?  
 6 A. Yes, sir.  
 7 SIR JOHN SAUNDERS: Thank you.  
 8 MR HORWELL: And for a time, the GMP operations room in  
 9 which you were on the night, that operations room was  
 10 involved in the testing, you remember that?  
 11 A. Yes, sir.  
 12 Q. Did there come a time when some other operations room  
 13 took over responsibility for the tests?  
 14 A. Yes, sir.  
 15 Q. Was that the Manchester Airport?  
 16 A. It was, yes.  
 17 Q. Which we've heard about. I'm going to ask the question  
 18 again. Can you remember when it was before the attack?  
 19 A. I can't remember.  
 20 Q. All right. We're going to hear some more evidence on  
 21 that.  
 22 SIR JOHN SAUNDERS: Give us a clue beforehand.  
 23 MR HORWELL: My understanding was it was before the attack  
 24 that Manchester Airport took over.  
 25 SIR JOHN SAUNDERS: Thank you very much.

1 MR HORWELL: I can't at the moment give you a date, sir, I'm  
 2 afraid.  
 3 SIR JOHN SAUNDERS: That's fine, just so we've got some  
 4 preview.  
 5 MR HORWELL: Were the tests successful in your experience?  
 6 A. Yes, sir.  
 7 Q. On the night of the attack, you were aware that the fire  
 8 and Ambulance Service had been contacted and informed?  
 9 A. Yes, sir.  
 10 Q. And that's because their log numbers, you told us --  
 11 A. Yes, their log numbers were on GMP's log.  
 12 Q. And Mr Randall, I'm sure it's obvious, but if you could  
 13 spell it out for us, please. The fact that their log  
 14 numbers were on the FWIN meant what?  
 15 A. Meant that the ambulance and Fire Service had been  
 16 informed.  
 17 Q. And had started to set up their own log?  
 18 A. Yes, sir, because we've got their log number, the  
 19 call-taker or whoever's contacted the ambulance and  
 20 fire.  
 21 Q. Mr Randall, you've been asked this: you've never before  
 22 been involved in setting up Silver control in response  
 23 to a spontaneous emergency; is that right?  
 24 A. That's right, sir.  
 25 SIR JOHN SAUNDERS: If you're moving on, can I just ask

1 this: on the night, you didn't go through this procedure  
 2 of setting up the channels, a channel, as a joint  
 3 channel?  
 4 A. No, sir.  
 5 SIR JOHN SAUNDERS: Would it have been your job to do it on  
 6 the night if given the appropriate instruction?  
 7 A. Yes, sir.  
 8 SIR JOHN SAUNDERS: Were you aware on the night that you  
 9 hadn't been given the instruction and you might have  
 10 expected to do it or has that never occurred to you?  
 11 A. It's never occurred to me, sir, I wasn't asked to do it.  
 12 SIR JOHN SAUNDERS: Right, thank you.  
 13 MR HORWELL: The fact that you had never done this before,  
 14 Mr Randall, is it obvious from that that setting up  
 15 Silver control in response to a spontaneous emergency  
 16 was a very rare event?  
 17 A. It was, yes.  
 18 Q. There have been some questions asked by a number of the  
 19 advocates as to the necessity for setting up Silver  
 20 control, the necessity for setting it up when you did --  
 21 within the golden hour is one of the phrases that has  
 22 been used. I just want to examine those issues and the  
 23 reasons why it was important to set up Silver control as  
 24 soon as possible, Mr Randall.  
 25 First of all, if there had been another attack?

1 A. Yes, sir.  
 2 Q. What advantages would Silver control have offered in  
 3 those circumstances?  
 4 A. It's for all the patrols from GMP on one channel because  
 5 you would have been getting patrols from other areas of  
 6 GMP all on to that single Talk Group, everyone can hear  
 7 what's going on, and it just relieves the radio  
 8 operators in the room because they've still got the  
 9 normal day-to-day running of other incidents on that  
 10 district.  
 11 Q. Does it relieve the pressures on the FDO?  
 12 A. Yes, sir, because then the Silver commander's in charge  
 13 of that incident and anything that's going on in that  
 14 time.  
 15 Q. Just in case it is thought, well, there wasn't another  
 16 attack, was it really necessary to have Silver control,  
 17 what would you say in response to that, Mr Randall?  
 18 I well understand no one has actually put that  
 19 proposition, but if that thought had been entertained,  
 20 was it really necessary, what would you say in relation  
 21 to that?  
 22 A. I think it was necessary. The Fire Service and  
 23 Ambulance Service were in the room at Silver control.  
 24 All the patrols that were dealing with the incident were  
 25 on one channel because the other police officers had

1 come from other parts of the force and then other  
 2 members of the police service from outside GMP.  
 3 SIR JOHN SAUNDERS: Well, apart from anything else, we've  
 4 already heard that the FDO was overloaded, got very  
 5 quickly overloaded, and until such time as somebody else  
 6 took over he was going to remain overloaded.  
 7 A. Yes, sir.  
 8 MR HORWELL: Looking at that same point from two other  
 9 directions. First of all, once set up that night,  
 10 Mr Randall, was it busy?  
 11 A. Yes, sir.  
 12 Q. And for how long did Silver control remain in operation?  
 13 A. It was around 4 weeks, sir.  
 14 Q. And that's to deal with all of the complexities that  
 15 follow an appalling atrocity of this nature?  
 16 A. Yes, sir.  
 17 Q. Mr Randall, I'm going to take the next matters as  
 18 quickly as I can because they're set out in your witness  
 19 statement and I will try and limit my references to it  
 20 because, of course, we can refer to them at a later  
 21 stage.  
 22 In your second witness statement you have set out  
 23 there in a number of paragraphs the importance that you  
 24 attach to the setting-up of Silver.  
 25 A. Yes, sir.

1 Q. And I'm going to move on because the paragraphs will  
 2 speak for themselves. But there is one further matter  
 3 that I want to refer to in a little detail. That's one  
 4 of the issues that was raised last week and again it  
 5 comes back to the golden hour and as to whether or not  
 6 it was really a good idea for you and others to leave  
 7 the operations room to go to force headquarters to set  
 8 up Silver control. That's what I want to ask you about  
 9 now.  
 10 Do you have your witness statements?  
 11 A. I do, sir.  
 12 Q. Could you go to your fourth witness statement? It's the  
 13 statement dated 27 April of this year. I won't ask for  
 14 it to be put on the screen. {INQ041226/1}.  
 15 Do you have that?  
 16 A. I do.  
 17 Q. I'm going to summarise the salient parts as quickly as  
 18 I can. If we go to {INQ041226/2}, paragraph 6, just so  
 19 that you can follow, Mr Randall. You set out in that  
 20 statement the fact that there was an overlap in shifts  
 21 at the time of this attack.  
 22 A. Yes, sir.  
 23 Q. And because there was an overlap in terms of the shifts,  
 24 did that mean that at the time of this attack the  
 25 operations room was well staffed?

1 A. It was, sir.  
 2 Q. At paragraph 7, do you set out the five staff members,  
 3 including yourself, who left the operations room to set  
 4 up Silver control?  
 5 A. Yes, sir.  
 6 Q. Did you also refer to in that paragraph two others?  
 7 A. Yes, sir.  
 8 Q. Jeanette McCardo (sic) who came from an operations room  
 9 that was located elsewhere within Manchester?  
 10 A. Yes.  
 11 Q. So you took her as well. And you refer also to  
 12 a Mr Burgess, who had been off duty but you contacted  
 13 him and asked him to come to Silver control to help you?  
 14 A. Yes, he helped me.  
 15 Q. In terms of the other four who left the operations room  
 16 with you, the details are set out in your statement,  
 17 Mr Randall, but can we summarise them in this way: did  
 18 you deliberately choose people to leave the operations  
 19 room so that they would have as little impact as  
 20 possible in the running of the operations room to meet  
 21 this emergency?  
 22 A. Yes, sir.  
 23 Q. In terms of that other operations room, located  
 24 elsewhere in Manchester, could that operations room also  
 25 have assisted the operations room that night?

1 A. If they had enough staff in, possibly, yes.  
 2 Q. In what way might it have assisted if requested?  
 3 A. They could have took — if they had enough staff over  
 4 there, which I don't know if they did or not, they could  
 5 have took a radio channel, a Talk Group, from the other  
 6 control room or they could have sent staff to Silver  
 7 control room if possible, if needed.  
 8 Q. And do you know if that was done other than the one  
 9 instance that we have referred to?  
 10 A. I couldn't tell you, sir.  
 11 MR HORWELL: All right.  
 12 Sir, that's all I ask. Thank you.  
 13 SIR JOHN SAUNDERS: Thank you.  
 14 MR DE LA POER: Sir, I have no questions arising.  
 15 Do you have any questions?  
 16 SIR JOHN SAUNDERS: No, I don't. Thank you very much. I'm  
 17 really grateful, Mr Randall, for your attending on two  
 18 occasions to help us with your evidence.  
 19 MR DE LA POER: Sir, we've been going for an hour and  
 20 a half. I wonder whether it would be a convenient  
 21 moment for a break.  
 22 SIR JOHN SAUNDERS: Quarter of an hour. Thank you very  
 23 much.  
 24 (10.58 am)  
 25 (A short break)

1 (11.18 am)  
 2 SIR JOHN SAUNDERS: I am sorry to have kept you waiting.  
 3 MR GREANEY: Not at all, sir.  
 4 With apologies for mispronouncing his surname all of  
 5 last week, the gentleman in the witness box is  
 6 David Myerscough. Could he be sworn, please?  
 7 PSS DAVID MYERSCOUGH (sworn)  
 8 Questions from MR GREANEY  
 9 MR GREANEY: Would you begin by telling us your full name,  
 10 please?  
 11 A. David James Myerscough.  
 12 Q. In May of 2017, were you a member of the police support  
 13 staff of Greater Manchester Police?  
 14 A. I was.  
 15 Q. In fact, do you still hold that position today?  
 16 A. I do.  
 17 Q. In May 2017, did you work in GMP's operational control  
 18 room or in one of them?  
 19 A. I did.  
 20 Q. In due course, as you'll appreciate, we'll come to that,  
 21 but first of all I'm going to ask you some questions  
 22 about your background and I'm at paragraph 4 of your  
 23 witness statement.  
 24 Did you first join GMP in December of 2012 in order  
 25 to train as a special constable?

1 A. I did, that's correct.  
 2 Q. Did you attest, or in other words qualify, in that role  
 3 in April 2013?  
 4 A. Yes.  
 5 Q. Did you begin working full-time for GMP as a radio  
 6 operator at some later stage?  
 7 A. I did, yes, 2014.  
 8 Q. But did there come a time when it became apparent to you  
 9 that it was not possible to combine your roles as a  
 10 special constable and a radio operator?  
 11 A. That's correct.  
 12 Q. So did you cease to work as a special constable in about  
 13 May 2017, before the arena attack?  
 14 A. That's correct, yes.  
 15 Q. When you began working as a radio operator in 2014, did  
 16 you undertake some training in that role?  
 17 A. I did.  
 18 Q. And did that training involve a 5-week course?  
 19 A. It did.  
 20 Q. Followed by a period of around 8 weeks of mentoring  
 21 in the actual OCR?  
 22 A. Yes.  
 23 Q. Was that course designed to teach you as a radio  
 24 operator a series of basic skills?  
 25 A. Basic skills and understanding of the systems that

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1 I used, yes.  
 2 Q. In your witness statement at paragraph 8, you identify  
 3 those basic skills in which you were trained as being  
 4 the assessment of the risk involved in incidents?  
 5 A. Yes.  
 6 Q. The deployment of officers to incidents?  
 7 A. Yes.  
 8 Q. How to update the logs with information?  
 9 A. Yes.  
 10 Q. And the carrying out of background checks using the  
 11 police IT databases?  
 12 A. Yes.  
 13 Q. Did you undertake before the arena attack some  
 14 additional training whilst working as a radio operator?  
 15 A. Yes, I did.  
 16 Q. In general terms, how would you describe that training?  
 17 A. The majority is delivered via an e-learning package  
 18 online, where you watch a presentation and perhaps  
 19 answer questions once that presentation is finished.  
 20 Q. I'm going to ask you to just keep your voice up so  
 21 everyone can hear you. The way in which you describe it  
 22 at paragraph 9 of your statement is there was force-wide  
 23 generic training, such as iOPs, which is a new GMP  
 24 computer operating system?  
 25 A. Yes, some of the training would be force-wide generic

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1 training, others would be specified to our role.  
 2 Q. Before the arena attack, had you any experience of  
 3 dealing with a major incident?  
 4 A. No.  
 5 Q. Or of dealing with Operation Plato?  
 6 A. No.  
 7 Q. Had you received training in dealing with major  
 8 incidents or in Operation Plato?  
 9 A. No.  
 10 Q. Had you received any training in the principles known as  
 11 JESIP?  
 12 A. Yes, a brief e-learning package.  
 13 Q. So a brief e-learning package lasting, is this correct,  
 14 between 30 minutes and an hour?  
 15 A. That's correct.  
 16 Q. Was the completion of that short course required of  
 17 radio operators in order to introduce people performing  
 18 that role to the term when it was introduced several  
 19 years ago?  
 20 A. It was, yes.  
 21 Q. I think your training record, and I'll be corrected if  
 22 this is wrong, shows you received that training at some  
 23 stage towards the end of 2014; does that sound about  
 24 right?  
 25 A. That sounds about right.

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1 Q. Was that training you received in JESIP of any use to  
 2 you on the night of the attack?  
 3 A. No. It gave me familiarity of some of the terms, but  
 4 very few.  
 5 Q. Next some questions, please, about your role as a radio  
 6 operator. In general terms, how would you describe that  
 7 role? In other words, what were you doing?  
 8 A. I'm responsible for deploying officers to incidents. So  
 9 a call would come through to GMP via the 999 or 101  
 10 system, which would then be input into the computer  
 11 system by a call handler. If it was for my specific  
 12 area -- I would always work a specific area within  
 13 Greater Manchester -- that would then land on my screen  
 14 and I would look at that incident, risk assess it, do  
 15 any necessary checks on it, and look to deploy an  
 16 officer if necessary.  
 17 Q. Does your role as a radio operator -- and I'm talking  
 18 about the period up until the night of the attack --  
 19 involve any liaison with the Ambulance Service and/or  
 20 the Fire and Rescue Service?  
 21 A. Yes, sometimes.  
 22 Q. Was that something that would happen every shift or less  
 23 frequently than that?  
 24 A. With the Ambulance Service it could be every shift, with  
 25 the Fire Service less frequently. We tend to speak more

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1 to the Ambulance Service.  
 2 Q. When you had such liaison with those other emergency  
 3 services, generally would that involve only details  
 4 about rendezvous points being exchanged and updates  
 5 in relation to jobs where those services had been  
 6 involved?  
 7 A. Sometimes, yes. Sometimes the ambulance would contact  
 8 the police if they had particular markers on an  
 9 individual who was perhaps violent, for example, and  
 10 they would tell us that they were at a rendezvous point  
 11 and once we had officers there, I would re-call them to  
 12 let them know we were there too or on our way. And then  
 13 other times we would arrive at incidents that required  
 14 ambulance for a medical issue and I would contact them  
 15 to ask them for their assistance in that matter.  
 16 Q. Did the role of radio operator --- and we're coming now  
 17 more to the issues with which we are concerned  
 18 in relation to the night --- did your role as a radio  
 19 operator involve you routinely answering phone calls  
 20 within the OCR?  
 21 A. No.  
 22 Q. Why not?  
 23 A. None of the calls come through to the radio operators.  
 24 Our system, the communications system we use doesn't  
 25 allow incoming calls from outside of GMP. We just don't

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1 answer telephone calls in our role.  
 2 Q. Although as we're going to hear, your role became very  
 3 different on the night?  
 4 A. It did, yes.  
 5 Q. Indeed, within the OCR, are there people with a separate  
 6 role of call-taker?  
 7 A. Yes.  
 8 Q. In simple terms do call-takers deal with phone calls  
 9 from the public and radio operators, such as you, deploy  
 10 police resources in response to those incidents?  
 11 A. That's correct, yes.  
 12 Q. Before we turn, as we will do shortly, to the events of  
 13 22 May, I want to ask you some questions, please, about  
 14 what have been described as action cards ---  
 15 SIR JOHN SAUNDERS: Just before we do that, I've understood  
 16 that there are obviously, for GMP generally, a large  
 17 number of call-takers who are by and large in a separate  
 18 building from the OCR.  
 19 A. They were at this time in 2017. We've since been mixed  
 20 into the same rooms, but at that time we were separate,  
 21 in separate buildings.  
 22 SIR JOHN SAUNDERS: So the particular call-takers you have  
 23 in the OCR, what calls would they be taking? Why would  
 24 calls go to the OCR rather than to the other places?  
 25 A. Those would be still taking 999 calls or 101 calls,

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1 those call-takers would always take those calls from  
 2 a member of the public, anyone using those systems.  
 3 SIR JOHN SAUNDERS: And it's not different, the sort of  
 4 calls that came through to the OCR?  
 5 A. No. The OCR is a terms for all the rooms where ---  
 6 SIR JOHN SAUNDERS: (Overspeaking).  
 7 A. --- and the radio operators are.  
 8 MR GREANEY: Thank you, sir.  
 9 Just a small number of questions about action cards.  
 10 In a moment I'm going to ask Mr Lopez to place on the  
 11 screen a draft action card, but please don't do so yet.  
 12 The INQ reference is {INQ040622/11}. So that you  
 13 know, Mr Myerscough, and so others are reminded, the  
 14 inquiry has received evidence from Chief Inspector Booth  
 15 of steps that he had taken long ahead of the arena  
 16 attack to draft some action cards for the use of those  
 17 who worked in the OCR. So that's the background to  
 18 these questions.  
 19 Mr Lopez, could we now have that on the screen,  
 20 please. {INQ040622/11}.  
 21 This is the action card that he had devised for  
 22 a person in your position, a radio operator. Before the  
 23 night of the arena attack, had you ever seen that action  
 24 card?  
 25 A. No.

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1 Q. It would necessarily follow, therefore, that you were  
 2 not using that action card on the night of the attack?  
 3 A. No.  
 4 Q. Were you using any action card on the night of the  
 5 attack?  
 6 A. No.  
 7 Q. Take that from the screen, please.  
 8 You have, as you told us earlier, continued to work  
 9 within the OCR in the period since the attack?  
 10 A. Yes, correct.  
 11 Q. Are there now action cards available to you in the event  
 12 of particular incidents, for example an Operation Plato  
 13 declaration?  
 14 A. There are, yes.  
 15 Q. Are those cards readily available to you?  
 16 A. They are kept within our room and in the event of  
 17 a training exercise or a real-life event, they would be  
 18 handed out by a supervisor in that room.  
 19 Q. Is that something that you would expect to be able to be  
 20 achieved quickly?  
 21 A. Yes.  
 22 Q. Have you received any training in the use of those  
 23 action cards, including the Operation Plato action card?  
 24 A. No.  
 25 Q. If an incident similar to the arena attack were to occur

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1 again and you were in the OCR, do you think, with the  
 2 position as it now is, you would be able to cope?  
 3 A. No.  
 4 Q. And in answering that question in the very clear way in  
 5 which you have, do you mean that you would not be able  
 6 to cope as a radio operator?  
 7 A. Yes, potentially -- particularly if the event was  
 8 happening in my area that I was covering at the time.  
 9 Q. And do you think you'd be able to cope if you were given  
 10 again the role that you had on the night of the 22nd?  
 11 A. No.  
 12 Q. Let's turn then to the night of the 22nd. That night,  
 13 were you working as the automatic number plate  
 14 recognition or ANPR radio operator?  
 15 A. I was, yes.  
 16 Q. Many will know what the ANPR system is, but effectively  
 17 if there was a hit on a particular number plate, were  
 18 you the person tasked with taking action in respect of  
 19 that?  
 20 A. Yes, I would get those activations from within  
 21 Greater Manchester and would decide what sort of action  
 22 was taken.  
 23 Q. Were you physically that night within the OCR?  
 24 A. Yes.  
 25 Q. Was the FDO within the same OCR as you?

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1 A. He was, yes.  
 2 Q. And also Ian Randall, who initially at least was the  
 3 FDS?  
 4 A. He was.  
 5 SIR JOHN SAUNDERS: So the call initially for a ANPR, and  
 6 again I don't want details, would come through to a call  
 7 handler?  
 8 A. No, it's a separate system which would --  
 9 SIR JOHN SAUNDERS: Put it straight through to you?  
 10 A. Yes.  
 11 SIR JOHN SAUNDERS: That's all I need to know, thank you.  
 12 MR GREANEY: So that was your job initially?  
 13 A. Yes.  
 14 Q. You were there with Dale Sexton, the force duty officer,  
 15 and Ian Randall, the force duty supervisor. Can you  
 16 describe where you were physically in relation to the  
 17 two of them, please?  
 18 A. I was sat a few metres away, facing both Ian Randall and  
 19 the force duty officer.  
 20 Q. So you were very near to him?  
 21 A. Very close, possibly around the same distance me and  
 22 yourself are now.  
 23 Q. So would it be fair to say that if he were to say  
 24 anything in your direction, particularly at a volume,  
 25 you would be expected to hear it?

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1 A. Yes.  
 2 Q. And would hear it?  
 3 A. Yes.  
 4 Q. Is it the position that during the early part of your  
 5 shift nothing of particular significance occurred?  
 6 A. Just a routine, ordinary shift, as far as it can be  
 7 described as ordinary within the police.  
 8 Q. And at about 10.30, were you outside the OCR with  
 9 a colleague getting some fresh air?  
 10 A. I was, yes, I was on my refreshment break.  
 11 Q. And indeed, did you hear a bang at that stage?  
 12 A. I did.  
 13 Q. I believe initially you didn't think very much of that?  
 14 A. No. We're located quite close to industrial areas and  
 15 it's not uncommon to hear fireworks or other noise, so  
 16 you wouldn't take notice of any loud bangs, really.  
 17 Q. Did you then shortly afterwards return to the OCR,  
 18 hoping that your shift would continue to be as  
 19 uneventful as it had been?  
 20 A. Yes.  
 21 Q. What in fact happened when you returned to the OCR?  
 22 A. I noticed there was a lot of activity in a particular  
 23 area, the radio operators covering the city centre,  
 24 quite a lot of activity around the FDO, and there was  
 25 a colleague of mine who said to me there's been an

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1 explosion at the city, in the arena.  
 2 Q. When you got back into that room was the atmosphere  
 3 markedly different from the atmosphere before you left?  
 4 A. Yes, it was, it was more intense and the general chatter  
 5 had quietened down a lot whilst people focused on the  
 6 role they were carrying out.  
 7 Q. And were the FDO and FDS in particular extremely busy?  
 8 A. Very busy.  
 9 Q. I'm going to fix a particular time that's of importance  
 10 to the role that you were going to perform. The time of  
 11 this is 22.56.51. The entry on our master schedule is  
 12 3171. So this is just after 22.55. This won't be on  
 13 your schedule but this is not going to take you by  
 14 surprise; indeed, I told you about it when we met early.  
 15 On his dictaphone recording, Mr Sexton, Chief  
 16 Inspector Sexton as he now is, is recorded saying:  
 17 "Right, I want one of you down there to come up  
 18 here, please, to answer my phone for me -- someone from  
 19 IMU, please."  
 20 A. Yes.  
 21 Q. Sergeant Core believes that he selected you for the role  
 22 of answering the FDO phone and his statement is  
 23 {INQ033297/1}. At paragraphs 51 and 52 {INQ033297/9},  
 24 he describes selecting for the role because he regarded  
 25 you as being of calm temperament. I would just like you

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1 to explain in your own words how you remember it was you  
 2 came to be appointed to perform the role of answering  
 3 the FDO phone.  
 4 A. I was sat quite close to the FDO and I think it was  
 5 a general call from the FDO for one person to come and  
 6 answer the phone. You have already mentioned that it  
 7 was the IMU and I don't work for the IMU, they are  
 8 a little further behind where I was sat. Nobody else  
 9 seemed to be volunteering or willing to go and do that  
 10 and recognising that they needed someone to go --  
 11 whether or not I was encouraged by Sergeant Core,  
 12 I don't remember, but I stood up and I volunteered to go  
 13 and answer his phone.  
 14 Q. Your recollection is on that call going out -- we've all  
 15 heard it, I think -- you effectively stepped forward and  
 16 stepped up into that role?  
 17 A. Yes.  
 18 Q. Was that a role that you wanted to perform?  
 19 A. Not at all.  
 20 Q. Why was it that you didn't want to perform the role?  
 21 A. I'd never had the right sort of training for that role,  
 22 I'm not familiar with the workings of the FDO, I have  
 23 never been an FDS or a supervisor, so it's not something  
 24 I have been involved in a lot. I have a brief  
 25 understanding of what they do but not an in-depth

1 knowledge, so I didn't feel prepared or qualified or  
 2 experienced enough.  
 3 Q. So why was it then that you decided that you would step  
 4 forward?  
 5 A. I recognised that somebody needed to help the FDO out,  
 6 who was clearly very, very busy, as was the FDS, and  
 7 nobody else was volunteering and they needed somebody  
 8 quickly to stand up and volunteer.  
 9 Q. I'm going to just deal in overview, to begin with, with  
 10 how you experienced it that night and then we'll look at  
 11 the kind of matters that you were dealing with.  
 12 I'm now at paragraphs 22 to 24 of your witness  
 13 statement.  
 14 Did you receive calls on the FDO line having taken  
 15 up that role?  
 16 A. I did, yes.  
 17 Q. Did you, to put it very simply, receive many, many  
 18 calls?  
 19 A. Yes.  
 20 Q. With hardly a second between each one of them?  
 21 A. That's correct.  
 22 Q. Did you regularly need to have to seek information from  
 23 the FDO to answer whatever was being raised on each  
 24 call?  
 25 A. I did, yes.

1 Q. We're going to see that, but was it easier said than  
 2 done on many occasions?  
 3 A. It was almost impossible to ask the FDO's assistance  
 4 just due to how busy it was at the time.  
 5 Q. The way in which you put it in your statement is this:  
 6 "With me having no experience of call-taking and  
 7 never having received full call-taking training, I felt  
 8 totally overwhelmed and completely stressed out by the  
 9 task of answering the FDO line but I just wanted to help  
 10 and assist as best I could."  
 11 A. Yes, that's correct.  
 12 Q. That's how it felt to you that night?  
 13 A. Very much.  
 14 Q. Throughout the period that you were answering that  
 15 telephone?  
 16 A. I think the stress levels increased even further than  
 17 that. It was horrendous.  
 18 Q. And you went on to say at paragraph 26:  
 19 "I was constantly answering the FDO line and I was  
 20 really stressed out and the intensity of the calls to  
 21 the FDO line only abated when the Silver command room  
 22 was set up in force headquarters."  
 23 Is that correct?  
 24 A. That's correct.  
 25 Q. Once Silver was set up, did things essentially return to

1 normal?  
 2 A. To the most extent, yes. I was coming towards the end  
 3 of my shift, I wasn't too far from the end, so yes  
 4 things returned to normal then.  
 5 Q. When Silver took over what did you realise about  
 6 yourself?  
 7 A. How I felt. I had realised at one point whilst  
 8 answering the phone that, without wanting to be too  
 9 graphic, I felt physically sick at one point with the  
 10 stress and pressure of it, and I had to quickly get some  
 11 water at one point. When Silver had taken over,  
 12 I realised the shirt I was wearing at the time was wet  
 13 through with sweat from the intense pressure.  
 14 Q. I want next to turn to some of the detail of what you  
 15 had to deal with that night. I know, I believe I know,  
 16 that you struggle, perfectly understandably, to recall  
 17 the details of many of the calls that you took.  
 18 A. Yes.  
 19 Q. But we have, as you will know, a recording of the calls  
 20 that you were involved in.  
 21 A. Yes.  
 22 Q. And we have a schedule which provides a transcript of  
 23 those calls and I believe that you've had an opportunity  
 24 to see that?  
 25 A. I have, yes.

1 Q. The INQ reference is {INQ041132/1}.  
 2 So just before I ask you about that, and we'll go  
 3 through it at something of a pace for reasons I'm going  
 4 to come to, I'm just going to establish certain features  
 5 of the schedule and also set down some ground rules for  
 6 everyone.  
 7 The schedule shows a transcript of the relevant  
 8 telephone conversations in which you were involved  
 9 together with some of the recording from the dictaphone  
 10 of the FDO, so we've got your calls and then, as  
 11 you will appreciate, sometimes what you were saying to  
 12 the FDO was picked on his dictaphone.  
 13 A. Yes.  
 14 Q. It gives us a more complete picture. The first entry in  
 15 which you actually are heard to speak in the role that  
 16 you were performing is timed at 23.00.10. The last  
 17 entry in which you actually speak is, I think, timed at  
 18 00.57.16, so it covers just short of a 2-hour period.  
 19 It's not necessary in our view to listen to any part  
 20 of the recording, or even to read out loud every entry  
 21 in the schedule, and what we'll do, as indicated, is  
 22 deal with it in summary because our aim is to gain an  
 23 impression of the pressure that you were under  
 24 throughout most, if not all, of that period, although  
 25 we will pause at a couple of points just to deal with

1 some of the detail.  
 2 Once we've been through that exercise, I'm going to  
 3 ask you to help us further with what it felt like to be  
 4 involved in that situation, and whether you felt to any  
 5 extent that your training and experience equipped you  
 6 for a role into which you were thrown on that night.  
 7 Finally, two things. We will not be looking and  
 8 should not look at any stage at the schedule on the  
 9 screen because it contains some operationally sensitive  
 10 material and, as a result, please don't mention any  
 11 radio channels or non-emergency service assets or  
 12 locations unless I lead that from you. Does that make  
 13 sense?  
 14 A. It does.  
 15 Q. Finally before we get to the schedule, I want to be  
 16 clear that in the questions that I asked Mr Sexton last  
 17 week and in the questions I'm going to be asking you  
 18 now, I'm not intending in any way to criticise you;  
 19 is that clear?  
 20 A. Thank you.  
 21 MR GREANEY: In fact, quite the contrary.  
 22 So let's go, please, to the schedule. Sir, do you  
 23 have that?  
 24 SIR JOHN SAUNDERS: I do.  
 25 MR GREANEY: I will identify the entries by number and also

1 give the time; do you have that as well?  
 2 A. I do.  
 3 Q. We'll start on the first page with entry 3958. So  
 4 we can see at 23.03.10, you ask the FDO what approach he  
 5 wants you to take to media enquiries and he makes clear  
 6 that he does not want you to speak to the media and that  
 7 you are to make plain to them that you are simply too  
 8 busy to field their enquiries; is that the position?  
 9 A. Yes.  
 10 Q. In the result did it prove as simple as that?  
 11 A. No, not at all. The media enquiries continued to come  
 12 constantly and in the end I just had to cancel the  
 13 calls, it wasn't even possible to advise them a press  
 14 officer would be in contact.  
 15 SIR JOHN SAUNDERS: So they get through to you, tell you who  
 16 they are and then you just ring off?  
 17 A. They flash up from the screen -- from my recollection  
 18 they were flashing up on the screen as a media line at  
 19 times, so you knew before you answered, but other calls  
 20 I think I answered not knowing who it was and it would  
 21 be members of media and I was doing my best to be  
 22 polite, but to advise that I wasn't able to deal with  
 23 them at the time. But they were just constant from the  
 24 time I was there.  
 25 SIR JOHN SAUNDERS: Thank you.

1 MR GREANEY: We are in fact going to see examples of you  
 2 trying to shut them down and they just don't take no for  
 3 an answer, so it takes a period of time for you to get  
 4 rid of them.  
 5 Sir, as I indicated, I'm going to be going through  
 6 this 18-page schedule at quite a pace. Obviously you're  
 7 making a note and if at any time you need me to pause or  
 8 slow down, of course you need only say so.  
 9 Next I'm going to go to entry 4118, which is timed  
 10 at 23.04.11. It seems from that call that the reason  
 11 why you spoke to the FDO about the media is because  
 12 a member of the media had come through. This is an  
 13 example of it taking you some time to shake that person  
 14 off the line because they kept pressing you for  
 15 information; is that correct?  
 16 A. That's correct.  
 17 Q. Next entry, 4206, 23.04.52. Immediately after you had  
 18 got rid of the member of the media, you took a call from  
 19 a firearms inspector that we have heard of called  
 20 Dave Murtagh; do you see that?  
 21 A. I do, yes.  
 22 Q. He indicated, as we read it, as follows:  
 23 "I've spoke to Mark Dexter, the TFC. He's declared  
 24 it as a Plato incident, but I'm on a conference with..."  
 25 And then he identifies a particular person:

1 "I just want that to be made confirmed. Can you ask  
 2 him: is he going to confirm it as a Plato incident?"  
 3 And then he spoke about a particular mobilisation.  
 4 So he seemed to be indicating to you, if we have read it  
 5 correctly, that Chief Inspector Dexter had declared  
 6 Operation Plato and he wanted to know whether the FDO  
 7 was going to confirm that.  
 8 A. Yes.  
 9 Q. Then as we see when we read on, there was a gap of about  
 10 a minute, and then you confirmed the declaration of  
 11 Operation Plato; is that correct?  
 12 A. That's correct.  
 13 Q. You appear from what you said, this is entry 4376, you  
 14 appear to have confirmed this as a Plato incident from  
 15 the FWIN.  
 16 A. Yes.  
 17 Q. As we can see:  
 18 "Yes, it's confirmed on the FWIN as a Plato  
 19 incident."  
 20 So can I ask you, so far as you recall, is that  
 21 correct, had you looked at the FWIN and seen  
 22 Operation Plato or had you spoken to the FDO?  
 23 A. I think in the minute gap I'd been looking at the FWIN,  
 24 scrolling up and down the pages, and spotting it on that  
 25 log that it had been declared as Operation Plato.

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1 Q. Was that the first time, on seeing it on the FWIN, that  
 2 you knew that Operation Plato had been declared?  
 3 A. It was, yes.  
 4 Q. Did you know what Operation Plato was?  
 5 A. No.  
 6 Q. We in fact know the answer to this question from what  
 7 Mr Sexton said, but it's important you should say so  
 8 yourself: had you been told by the FDO to keep that  
 9 information, namely the declaration of Plato, from the  
 10 other emergency services?  
 11 A. No.  
 12 Q. Next, entry 4595, timed at 23.07.19. You had the first  
 13 of a number of conversations with or about military  
 14 assets. You can just say yes, I think, in answer to  
 15 that question and I don't need to ask you any more about  
 16 that, nor any other such calls in which you were  
 17 involved.  
 18 Then over the page to entry 4839, at 23.09.27, you  
 19 took the first call from a colleague in another force  
 20 about the supply to GMP of their armed response?  
 21 A. I did, yes.  
 22 Q. Once more, you were involved in a series of such calls,  
 23 were you not?  
 24 A. I was, yes.  
 25 Q. And it will not be necessary for me to take you through

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1 each one, at least not in any detail.  
 2 4975, and it's now 23.10.54, so we're starting to  
 3 develop the sense, are we not, of one call ending and  
 4 another starting almost straightaway afterwards?  
 5 A. Yes.  
 6 Q. They're not just calls all about the same topic, save  
 7 that they're the general topic of the arena attack, they  
 8 are from an array of different types of persons?  
 9 A. They're from lots of different people, lots of different  
 10 subjects, all wanting a range of different information.  
 11 Q. At line 4975, as I said, 23.10.54, you spoke to  
 12 Sergeant Lawton, who we know was the GMP firearms  
 13 tactical adviser. He was asking you whether  
 14 Operation Plato had been declared yet and you were able  
 15 to tell him that it had.  
 16 A. Yes, correct.  
 17 Q. Bottom entry on that page, 5054, 23.11.39. You took  
 18 a call from Superintendent Hill, who in due course was  
 19 to take over as Silver. He asked if people needed to  
 20 turn out and you said that you would speak to the FDO  
 21 about that.  
 22 A. Yes.  
 23 SIR JOHN SAUNDERS: Did you know who he was?  
 24 A. I didn't know Superintendent Hill. I don't recall  
 25 whether I knew him previously to that night or since.

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1 I have worked — he did join our rank for a while, but  
 2 without being sure of the night I'm not sure whether  
 3 I knew him before that time.  
 4 SIR JOHN SAUNDERS: Thank you.  
 5 MR GREANEY: He is asking you if he and others need to turn  
 6 out, this is the superintendent asking you, the radio  
 7 operator. Did you have the responsibility to make that  
 8 decision?  
 9 A. No, I would never make that decision.  
 10 Q. So you needed to speak to the FDO?  
 11 A. I did.  
 12 Q. And so this is the first occasion upon which — not the  
 13 first but this is one of many occasions upon which you  
 14 don't have the authority or knowledge to answer  
 15 a question and you're having to wait until you can speak  
 16 to the FDO to give an answer?  
 17 A. Yes.  
 18 Q. Over the page at 5315, 23.14.05, you took a message from  
 19 Mr Jackson, then the head of CTU, now of course  
 20 assistant chief constable, and understandably, given the  
 21 role that he had, he was seeking information from you —  
 22 A. Yes.  
 23 Q. — and you told him what you knew. At 23.15 and 23.16,  
 24 entries 5418 and 5537, you received further calls from  
 25 colleagues in other forces asking whether it was correct

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1 that Plato had been declared, timing and reason for  
 2 that, and again you told them what you knew?  
 3 A. Yes.  
 4 SIR JOHN SAUNDERS: Just going back with the one with  
 5 Russ Jackson, you actually volunteered that  
 6 Operation Plato had been declared without particularly  
 7 any question from him?  
 8 A. Yes, I believe so, yes, looking at that transcript .  
 9 SIR JOHN SAUNDERS: But still really didn't know what it  
 10 was?  
 11 A. No.  
 12 SIR JOHN SAUNDERS: Thank you.  
 13 MR GREANEY: Did you have time to try to find out what it  
 14 was?  
 15 A. No, it would have been impossible to find out.  
 16 Q. We're now at page 3 of the schedule. At lines 5795 and  
 17 7922, we see in combination an interesting call you  
 18 received. You received that call at 23.19.05 and it was  
 19 from a sergeant on the mounted unit. Do you have any  
 20 recollection of that particular call?  
 21 A. Only after looking back at it. It does look familiar,  
 22 the conversation I had, yes.  
 23 Q. Even in the context of an extraordinary night, this was  
 24 quite a unusual call?  
 25 A. Yes, it was.

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1 Q. She explained to you as we can see that her husband,  
 2 David Ryle, was, as she put it, a dog sergeant?  
 3 A. Yes.  
 4 Q. And, sir, I can confirm from other material I've seen  
 5 that his dog is an explosives dog.  
 6 She was saying to you that her husband,  
 7 Sergeant Ryle, was getting ready and she was asking on  
 8 his behalf if he was needed?  
 9 A. Yes.  
 10 Q. So the picture is that he wasn't taking up his time  
 11 making the call, he'd asked his wife, another sergeant,  
 12 to do that for him. You indicated you had seen  
 13 a reference to an explosives dog on the FWIN?  
 14 A. Yes.  
 15 Q. Again from the FWIN I can confirm that there had been  
 16 such a reference, it was at 23.10, and in the result the  
 17 dog sergeant, as he had been described, decided to  
 18 deploy to a nearby police station and his wife gave you  
 19 his mobile number?  
 20 A. Yes.  
 21 Q. Just a few questions emerging out of that call. First  
 22 of all, did anyone ever say to you that there was any  
 23 urgency about getting an explosives dog to the scene?  
 24 A. No, I believe I'd picked up the information about one  
 25 being required from the FWIN itself. I never had

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1 a conversation about the dog.  
 2 Q. Then at the top of page 4, which is the second entry,  
 3 5922, right at the top, in that call can you see you are  
 4 recorded saying:  
 5 "Because we're still waiting for an RV point at the  
 6 moment."  
 7 This is 23.20; do you see that?  
 8 A. Yes, I do.  
 9 Q. First, at that stage what did you understand an RV point  
 10 was?  
 11 A. A rendezvous point for other officers, not armed  
 12 officers, unarmed officers, to gather in order for  
 13 further directions to be given to them to move towards  
 14 the scene.  
 15 Q. Was it your understanding at that stage, 23.20, that you  
 16 were still waiting for an RVP?  
 17 A. Yes.  
 18 Q. Did you know why you were still waiting for an RV point?  
 19 A. No, I just knew I hadn't been provided with one and  
 20 I hadn't seen one written down anywhere.  
 21 Q. Next, 6063. This is 23.21.2.5 by now and you received  
 22 a call or a message from a GMP employee called  
 23 Jade Hines?  
 24 A. Yes.  
 25 Q. In fact she doesn't work in the OCR; is that correct?

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1 A. She doesn't work in my particular room. At that time  
 2 she worked elsewhere within Greater Manchester in a  
 3 call –handling role.  
 4 Q. She was in a completely different building away from  
 5 where you were?  
 6 A. Completely different town.  
 7 Q. As we can see, she was trying to put Inspector Lodge,  
 8 the BTP FIM, through to you. So can you just tell us in  
 9 simple terms what was happening at that stage? By that  
 10 I mean this: Inspector Lodge had not come through to the  
 11 FDO line. That's apparent. So what is your  
 12 understanding of what had occurred?  
 13 A. I think he must have used either a non-emergency number,  
 14 the equivalent of 101, or even 999, and asked to be put  
 15 through to Greater Manchester Police to speak to a call  
 16 handler. That's the only way I can think of him getting  
 17 through that way.  
 18 Q. At 6276, 23.23.43, inspector Lodge is put through to you  
 19 and it's worth looking at the transcript of that call on  
 20 the screen. It's just a short passage. I appreciate  
 21 you can see the transcript from the schedule and, sir,  
 22 you can as well, but others who are watching won't  
 23 necessarily be able to.  
 24 Let's provide a proper context. Mr Lopez, this is  
 25 {INQ018834T/13}.

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1 confuse ourselves, that is not the time of the call  
 2 that is the counter time. The actual time, of course,  
 3 is 23.23.43 and Chief Inspector Lodge:  
 4 "Hello there, it's Chief Inspector Lodge from  
 5 British Transport Police."  
 6 You say:  
 7 "Hello, sir."  
 8 He asks:  
 9 "Who am I speaking to, please?"  
 10 You give your name and identify yourself as the  
 11 radio operator and say you're answering the phone for  
 12 the FDO.  
 13 Over to the next page {INQ018834T/14}, please:  
 14 "I need to find out [he asks] is this location, the  
 15 actual seat of the bomb, on your jurisdiction as GMP or  
 16 ours as British Transport Police at the railway  
 17 station?"  
 18 You say:  
 19 "I think it'll be on yours. If it's within the  
 20 arena itself, I believe it's BTP jurisdiction."  
 21 "Right", says Chief Inspector Lodge, the SDO, in  
 22 fact.  
 23 "Is this City Hall's location? Is that where the  
 24 bomb's gone off, is it?"

1 "I've got it inside the arena, the arena above  
 2 Victoria Station."  
 3 And he confirms where that has happened. He then  
 4 asks a little bit further down the page:  
 5 "And who's the senior officer on GMP in charge of  
 6 a GMP response at this time, please?"  
 7 You say:  
 8 "I shall find out for you. I won't be a moment."  
 9 We'll come back to that in a second.  
 10 There are some voices in the background. It's  
 11 obvious you're speaking to the FDO. You then come back  
 12 on the call with Chief Inspector Lodge:  
 13 "At the minute, it's Inspector Sexton who's with me  
 14 but he's just caught up on the other channel. I'm not  
 15 quite sure who's going to be taking over eventually."  
 16 He asks for the mobile number of the FDO and if we  
 17 look at the bottom of the page, the number you give for  
 18 him is not his mobile number, but is in fact the FDO  
 19 line number?  
 20 A. Yes.  
 21 Q. We can take that from the screen now, please.  
 22 SIR JOHN SAUNDERS: And we had part of that from  
 23 Inspector Lodge when he gave evidence?  
 24 MR GREANEY: We did indeed. Mr de la Poer took us to that  
 25 transcript and you may recall Mr Gibbs drew some

1 information to Mr de la Poer's attention at that stage  
 2 about the timing of that call.  
 3 SIR JOHN SAUNDERS: Yes. I hope you'll all understand why  
 4 we can't show all the conversations which are going  
 5 through. I know it'd be easier to follow if you could,  
 6 but it's simply not possible.  
 7 MR GREANEY: I am sorry, sir, if the way in which I am doing  
 8 it isn't making sense to people. I am trying to get  
 9 through it at an appropriate speed but efficiently for  
 10 reasons that are obvious to everyone. But if isn't  
 11 making sense I'm sure Mr Cooper will be the first to  
 12 draw it to my attention.  
 13 MR COOPER: We're grateful. We're liaising all the time  
 14 with our clients.  
 15 SIR JOHN SAUNDERS: Thank you very much.  
 16 MR GREANEY: Just a small number of questions about that  
 17 particular transcript. Obviously you start to get into  
 18 the issue of jurisdiction in the course of that call.  
 19 Did you have an understanding of what all of that was to  
 20 do with?  
 21 A. Yes, I understood that the arena fell into BTP  
 22 jurisdiction due to its location above Victoria Train  
 23 Station.  
 24 Q. Did you have any understanding at that stage of what has  
 25 been described as the issue of primacy, so not

1 jurisdiction, because as it turns out both GMP and BTP  
 2 had jurisdiction, but who should be the primary  
 3 responder, my phrase, in the event of something like the  
 4 arena attack?  
 5 A. No.  
 6 SIR JOHN SAUNDERS: So what was the relevance of  
 7 jurisdiction as far as you were concerned, except the  
 8 fact that he was asking the question?  
 9 A. I didn't believe there was one apart from the question  
 10 being asked and I answered to the best of my knowledge.  
 11 MR GREANEY: So you were posed a question and you just  
 12 answered it as best you could?  
 13 A. I did, yes.  
 14 Q. It seems also from that call that you didn't at that  
 15 stage, 23.23, know who the senior officer in charge of  
 16 the response was?  
 17 A. No.  
 18 Q. So you had to ask the FDO and he said, "It's me"?  
 19 A. Yes.  
 20 Q. And also, as we've just identified, Mr Lodge asked for  
 21 a mobile number so that he could contact the FDO direct,  
 22 but you didn't give it and instead gave the FDO number?  
 23 A. Yes.  
 24 Q. Why was that?  
 25 A. I was probably trying to ask the inspector for his

1 mobile number and realised he either couldn't give it to  
 2 me because he was too busy or he couldn't hear me and,  
 3 wanting to give him some sort of form of contact,  
 4 I passed over the direct extension line instead.  
 5 Q. Next, entry 6913. It's now 23.30.30. You field a call  
 6 from Inspector Murtagh about radio channels and we don't  
 7 need to go into the detail of that.  
 8 You then took a call from Julie Walker of the Civil  
 9 Contingency Unit. Did you know what the Civil  
 10 Contingency Unit was?  
 11 A. No.  
 12 Q. We'll look again at this transcript because there is one  
 13 issue I need to ask you about.  
 14 {INQ018835T/1}.  
 15 Julie Walker identifies herself and where she's  
 16 calling from. She says:  
 17 "I'm just ringing to see if a major incident been  
 18 called for the incident at the..."  
 19 She's obviously saying arena. And you say:  
 20 "Yes, there has."  
 21 "It has? Has the local authority been activated?"  
 22 "As far as I know, yes -- sorry, where were you  
 23 calling from?"  
 24 She again identifies she's calling from the CCU and  
 25 tells you a little bit about what that does. You say:

1 "Yes. Just bear with me. It's a Plato incident.  
 2 A major incident's been declared."  
 3 "Right. Okay. You say it's a Plato incident as  
 4 well?"  
 5 Over the page {INQ018835T/2}, please:  
 6 "Yeah."  
 7 "Okay. And somebody from the local authority has  
 8 been activated."  
 9 And you again confirm that's happened as far as you  
 10 know and that's an end to that call.  
 11 SIR JOHN SAUNDERS: Can we just go back a page  
 12 {INQ018835T/1}, sorry? I just want to check something.  
 13 We've got slightly more, oddly enough, on this one.  
 14 (Pause)  
 15 On the penultimate entry:  
 16 "Just bear with me, it's a Plato incident."  
 17 And on this it says:  
 18 "If you term it the same, a major incident's been  
 19 declared", which may have some relevance.  
 20 MR GREANEY: It does. That leads straight into the question  
 21 I wanted to ask. Did you know an Operation Plato from  
 22 a major incident?  
 23 A. No.  
 24 Q. Were they, to you, essentially one and the same?  
 25 A. Yes.

1 Q. Did you have any familiarity with the GMP major incident  
 2 plan?  
 3 A. No.  
 4 Q. That night, would you have known yourself, without  
 5 seeking assistance, where to find it?  
 6 A. No.  
 7 Q. Would you have known where to find the Operation Plato  
 8 plan?  
 9 A. No.  
 10 Q. Had you to the best of your knowledge ever seen that  
 11 plan?  
 12 A. No.  
 13 Q. Next, I'm going to go to a series of entries and take  
 14 them together. They are 7144, 7265 and 7269, and they  
 15 relate to a call. So we're starting at the bottom of  
 16 page 5, although yours might not be numbered -- yes,  
 17 it is, in the bottom left hand corner.  
 18 These calls start at 23.33 and they are a call from  
 19 Steve Taylor, who describes himself as an NNAS tac  
 20 adviser. He asked whether GMP wanted their Gold at  
 21 Silver -- we know their Silver, Annemarie Rooney was  
 22 there or was on her way there -- and he also asked you  
 23 to set up an interop channel. And he added that:  
 24 "If you could open a channel with their control  
 25 room, that would be [as he said] ideal in terms of

1 sharing information."  
 2 Did you know what an interop channel was?  
 3 A. I knew of interop channels from working elsewhere on  
 4 a different radio channel -- I'm trying not to give any  
 5 sensitive information away. I had heard the term  
 6 interop channel, not this particular one. I'd used them  
 7 elsewhere for another purpose.  
 8 Q. Did you have the authority and, if so, knowledge to set  
 9 up an interop channel?  
 10 A. No.  
 11 Q. As we are going to see a little later, when you got a  
 12 moment, was that something you raised with the FDO?  
 13 A. Yes.  
 14 Q. You then fielded a series of other calls that we don't  
 15 need to get into, but at 23.38, you raised the question  
 16 of an interops channel. This is entry 7670 at the top  
 17 of page 7. So a number of minutes have passed but in  
 18 those minutes you'd been dealing with other calls, so  
 19 this seems to be the first opportunity you had to raise  
 20 the question of this channel with the FDO.  
 21 We can see that you are recorded as saying to the  
 22 FDO:  
 23 "Ambulance are asking can they have an interops  
 24 channel with their control room."  
 25 And the FDO replies:



1 "They're going to need to -- we haven't got it set  
 2 up yet so they're going to have to wait."  
 3 So that was his response?  
 4 A. Yes.  
 5 Q. You then fielded calls from the casualty bureau and CTU.  
 6 You spoke to the FDO about the casualty bureau and he  
 7 made plain that he is so busy that they are going to  
 8 have to wait and you field a further call from  
 9 Sergeant Lawton.  
 10 A. Yes.  
 11 Q. So that is a very high-level summary of what I know,  
 12 having listened to the recording, was a very busy time.  
 13 The next call that I'll pick up on in more detail is  
 14 entry 8405 at the bottom of page 8?  
 15 SIR JOHN SAUNDERS: I'm really sorry.  
 16 MR GREANEY: Not at all, sir.  
 17 SIR JOHN SAUNDERS: The casualty bureau when they ring, they  
 18 are indicating that it has been directed it should be  
 19 set up by Superintendent Hill?  
 20 A. Yes.  
 21 SIR JOHN SAUNDERS: But nevertheless it needs to go through  
 22 or have the authority of the FDO to do it; is that  
 23 right?  
 24 A. I wouldn't know. I think he needed to have some sort of  
 25 involvement to set it up, whether that needs to be

1 activated from his desk, I'm not sure, but he needs to  
 2 be involved, yes.  
 3 SIR JOHN SAUNDERS: (Overspeaking) from what we have heard.  
 4 MR GREANEY: Thank you, sir.  
 5 Entry 8405 timed at 23.47.56, when you receive  
 6 a call from an Alison Thornton, who is to tell you that  
 7 she is the staff officer for the ACC. And we've  
 8 understood from the FDO that he understood that that was  
 9 a reference to ACC Ford, who was Gold, and you were told  
 10 in that call that the ACC wanted a copy of the Plato  
 11 plans as a matter of urgency.  
 12 Subsequently, you raised that with the FDO who made  
 13 plain that there was certainly not a copy to hand.  
 14 I won't take you to this entry, it's well ahead in the  
 15 schedule. You weren't able to raise it with him until  
 16 36 minutes later at 00.23.42. We can go to the entry if  
 17 you want, sir, but this will probably suffice. It's  
 18 entry 9584.  
 19 So the question had been raised by the staff officer  
 20 to the ACC at 23.47.56, you raised it with the FDO at  
 21 00.23.42, 36 minutes later. He makes plain that  
 22 there isn't a copy to hand. You, as you've told us,  
 23 wouldn't have known where to start.  
 24 Bearing in mind there was a 36-minute delay, not to  
 25 use that word in any critical sense, between the issue

1 being raised and you raising the question with the FDO,  
 2 does that demonstrate the degree of pressure that you  
 3 were under and/or the degree of difficulty in speaking  
 4 to the FDO?  
 5 A. Yes, I can remember making notes on a piece of paper in  
 6 front of me, handwritten notes, and trying to get to  
 7 each one in chronological order as and when the FDO was  
 8 able to speak to me, but it was becoming harder and  
 9 harder as the time went on to raise any points.  
 10 SIR JOHN SAUNDERS: So you were having to write things done  
 11 on a bit of paper and sort of tick them off when you had  
 12 done them?  
 13 A. Yes.  
 14 SIR JOHN SAUNDERS: Did you keep that as a matter of  
 15 interest?  
 16 A. I didn't, no.  
 17 SIR JOHN SAUNDERS: Okay, it doesn't matter.  
 18 MR GREANEY: Indeed, we can see the very next thing that you  
 19 were required to deal with, which accounts for why you  
 20 couldn't raise plans straightaway, was because at  
 21 23.50.18 -- this is entries 8535 and 8631 -- you  
 22 received a call from the GMFRS NILO Andy Berry who  
 23 wanted an FCP, a forward command point, in order to  
 24 deploy, as he explained, his MTFA capability to that  
 25 location in order to co-locate with the

1 Ambulance Service. We listened to that call last week.  
 2 I think you followed the evidence of the FDO;  
 3 am I right.  
 4 A. I did, yes.  
 5 Q. So we don't need to do so again. Everyone will have  
 6 that quite striking conversation in mind. Can I ask you  
 7 just this: did you know that night what a forward  
 8 command point was?  
 9 A. No.  
 10 Q. Did you know whether it differed from an RVP and, if so,  
 11 how?  
 12 A. No. No.  
 13 Q. Did you have the faintest idea of how to manage that  
 14 particular situation?  
 15 A. No.  
 16 Q. In the end, as we know, Andy Berry rejected the  
 17 locations you'd given and indicated that the  
 18 Ambulance Service was at Thompson Street Fire Station.  
 19 At 23.55, the media were calling again and you then  
 20 dealt with calls about whether staff should remain on  
 21 duty; that's 8781 and 8805.  
 22 There was then a further call from the media, 8828.  
 23 Then, 8939, you spoke to Sergeant Ryle, who  
 24 I mentioned earlier, the dog sergeant, about the  
 25 deployment of his explosives search dog.

1 8892, so the top of page 12, to give a flavour of  
 2 the media enquiries that were being made. At 00.02.44,  
 3 so we are now past midnight, you received a call from a  
 4 journalist in Hong Kong about the arena attack.  
 5 A. Yes.  
 6 Q. And again that journalist proved quite a difficult  
 7 person to shake off so as to enable you to return to  
 8 your other duties of answering that phone?  
 9 A. Yes.  
 10 Q. Next, 9039, timed at 00.04.11. After dealing with  
 11 a call about CCTV, you spoke to John Fletcher, a GMFRS  
 12 NILO. He said that they were going to an RVP at  
 13 Thompson Street Fire Station and he asked for a police  
 14 presence there:  
 15 "Just coordinating so we've got that contact."  
 16 And as will be obvious, it is now over 90 minutes  
 17 after the explosion and you told him that you would  
 18 speak to the FDO and see what you could do for him.  
 19 A. Yes.  
 20 Q. Again, was that your reaction because you didn't have  
 21 the authority to deploy officers to that location?  
 22 A. Yes, that's correct, or any means to at that point  
 23 I wasn't on a radio channel so I wouldn't have been able  
 24 to even if I had.  
 25 Q. 9187, 00.09, you then spoke to the TAU and then to

1 Fox News.  
 2 Then, as I said, at 00.09.40, entry 9187, you spoke  
 3 again to Mr Lodge of BTP and he asked to be called  
 4 direct by the senior GMP officer at the scene and he  
 5 gave his number for that purpose.  
 6 A. Yes.  
 7 Q. 9226 and 9252, a conversation starting at 00.11.17. And  
 8 again, the casualty bureau is calling you. You are  
 9 asked by Mr Palfrey of the casualty bureau who the Gold  
 10 commander is and it was necessary for you to seek an  
 11 answer to that question from the FDO; is that right?  
 12 A. That's right.  
 13 Q. Does it follow at that stage you didn't know who the GMP  
 14 Gold was?  
 15 A. That's correct.  
 16 Q. Over the page, page 14, 9307. At 00.14.05, you spoke to  
 17 Superintendent Thompson. Was he someone that you knew?  
 18 A. No.  
 19 Q. He explained that he was going to, as he put it, try to  
 20 take over the TFC role and, as we know, that did happen  
 21 shortly afterwards.  
 22 SIR JOHN SAUNDERS: But he was having difficulty getting  
 23 through to do that?  
 24 A. Yes.  
 25 MR GREANEY: 9353, still on page 14. At 00.15.33 you

1 started to make attempts to put Inspector Lodge in touch  
 2 with the ground—assigned tactical firearms commander,  
 3 Chief Inspector Dexter, but there was confusion because  
 4 in the first instance he asked for Mr Lodge to come to  
 5 the main entrance to Victoria, when you weren't to know,  
 6 but we do, Mr Lodge was in London, something that he  
 7 told you at 00.20.07, entry 4983 (sic).  
 8 Thereafter, I'm not going to suggest that you did  
 9 nothing, but would it be fair to say that the pressure  
 10 dropped off very substantially?  
 11 A. Yes, once Silver started to control the situation, it  
 12 did.  
 13 SIR JOHN SAUNDERS: Just so there's no confusion on the  
 14 transcript it was in fact 9483 rather than 4983.  
 15 MR GREANEY: Thank you very much, sir, for spotting that.  
 16 During that whole period that we've looked at, were  
 17 you either on the phone answering a call to the FDO or  
 18 speaking to the FDO?  
 19 A. Yes.  
 20 Q. Just constantly?  
 21 A. Constantly.  
 22 Q. And were you regularly being asked questions that you  
 23 didn't know the answer to?  
 24 A. I would say the majority I didn't have the answer to or  
 25 didn't know the answer to.

1 Q. Or to deal with situations that you did not have the  
 2 authority to resolve?  
 3 A. Yes.  
 4 Q. I said that I was going to return at the end of my  
 5 questions to ask you a little more about how you felt  
 6 in that situation that we now have a better  
 7 understanding of and whether you were trained and  
 8 experienced to cope with it.  
 9 In terms of your professional life up until that  
 10 point, and I have no doubt since, how did that night  
 11 match up to others?  
 12 A. The worst night of my professional life before then and  
 13 since then.  
 14 Q. You describe it in your statement, in paragraph 27, as:  
 15 "The most difficult stressful night of my life from  
 16 a professional point of view."  
 17 A. Yes, that's correct.  
 18 Q. Did you feel overwhelmed?  
 19 A. Very much so.  
 20 Q. Did you feel unsupported?  
 21 A. Yes.  
 22 Q. And did you feel that you were in a role that you simply  
 23 weren't trained or experienced to perform?  
 24 A. Yes.  
 25 Q. But, as I suspect, indeed expect, did you that night do

1 everything that you could to the best of your ability ?  
 2 A. Absolutely, yes.  
 3 Q. And bearing in mind your level of training and  
 4 experience, do you think there is anything more that you  
 5 personally could have done as the event unfolded?  
 6 A. No, not that night.  
 7 Q. At paragraph 30, you state this:  
 8 "I was in a situation that I wasn't trained for and  
 9 lacked the relevant experience for. It was a situation  
 10 that I shouldn't have been placed in."  
 11 Is that right?  
 12 A. Yes.  
 13 Q. But you add by way of balance:  
 14 "I recognise that the reality of that night was that  
 15 the demand on the FDO was so significant that someone  
 16 had to perform the role that I did."  
 17 A. Yes.  
 18 Q. "There were no call handlers in the OCR at that time and  
 19 that meant that a radio operator had to perform that  
 20 role."  
 21 A. Yes.  
 22 Q. You say finally:  
 23 "I was the person that the responsibility fell on  
 24 and I did everything I could to make sure I dealt with  
 25 what was an extremely demanding and stressful role as

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1 effectively as possible."  
 2 A. That's correct, sir.  
 3 MR GREANEY: Mr Myerscough, thank you very much indeed for  
 4 answering my questions. I'm going to, sir, call, first  
 5 of all, upon Mr Wood, who represents the interests of  
 6 Mr Sexton and Mr Dexter.  
 7 MR WOOD: Thank you, Mr Greaney, but in fact we have no  
 8 questions of this witness.  
 9 SIR JOHN SAUNDERS: Thank you very much.  
 10 MR GREANEY: Next then, on behalf of North West Fire  
 11 Control, Mr Smith, please.  
 12 MR SMITH: Thank you, sir, we now have no questions.  
 13 SIR JOHN SAUNDERS: You've obviously done a good job so far.  
 14 MR GREANEY: I think that's the first time you've said that,  
 15 sir, thank you very much. Let's hope some momentum is  
 16 developing behind that approach of no questions.  
 17 Ms Johnson on behalf of GMCA, do you have questions?  
 18 MS JOHNSON: We have no questions either.  
 19 MR GREANEY: Thank you very much.  
 20 Mr Weatherby on behalf of the families?  
 21 MR WEATHERBY: Indeed, Mr Greaney has covered all of the  
 22 questions that I was going to ask as well, so thank you  
 23 very much.  
 24 MR GREANEY: Thank you, Mr Weatherby. So finally,  
 25 Mr Horwell on behalf of Greater Manchester Police.

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1 MR HORWELL: I can't possibly interrupt the flow, sir. Can  
 2 I simply say this: there is evidence to come as to the  
 3 dedicated media line. I pointed this out a few days  
 4 ago. I can ask Mr Myerscough about it, but I think  
 5 it is better coming from those who put in the systems or  
 6 at least know the systems inside out, so I will leave it  
 7 to that opportunity.  
 8 SIR JOHN SAUNDERS: Thank you.  
 9 MR GREANEY: Sir, you'll have seen Mr Cooper wanted to say  
 10 something to me. He doesn't have any question to ask,  
 11 but there's something he's instructed on behalf of his  
 12 families to say and it is entirely appropriate he should  
 13 do so.  
 14 MR COOPER: I have been instructed to say to this witness  
 15 that they would publicly like to thank him for stepping  
 16 up into an impossible situation and doing his very best.  
 17 SIR JOHN SAUNDERS: Thank you very much.  
 18 MR GREANEY: Sir, that concludes the evidence of  
 19 Mr Myerscough.  
 20 SIR JOHN SAUNDERS: Mr Myerscough, I also thank you very  
 21 much for coming to give me your evidence and the  
 22 experience on the night. Even if you'd had the greatest  
 23 training in the world for what happened on that night,  
 24 I very much hope it will still remain or would have  
 25 remained the very worst night of your professional

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1 career.  
 2 Thank you very much for coming to tell me about it.  
 3 MR GREANEY: Sir, the options are that we either take our  
 4 normal break or we break early for lunch. In terms of  
 5 the management of today, it's probably better that we  
 6 take an early lunch and return just before 1.30, please.  
 7 SIR JOHN SAUNDERS: If that's not inconvenient to anybody,  
 8 that seems a sensible thing to do. So we'll break off  
 9 until 1.30.  
 10 MR GREANEY: Thank you very much indeed, sir.  
 11 (12.25 pm)  
 12 (The lunch adjournment)  
 13 (1.30 pm)  
 14 CHIEF INSPECTOR RACHEL BUCKLE (sworn)  
 15 Questions from MR DE LA POER  
 16 MR DE LA POER: Can you please begin by stating your full  
 17 name?  
 18 A. My full name is Rachel Delphina Clare Goulding; at the  
 19 time of the incident I was Rachel Buckle.  
 20 Q. You and I have spoken about how I should refer to you  
 21 in the course of giving your evidence and you have  
 22 indicated you are content to be referred to as  
 23 Ms Buckle, so as to help everyone's understanding,  
 24 bearing in mind that name appears throughout the papers?  
 25 A. Absolutely, sir.

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1 Q. We'll begin by introducing your police service. Did you  
 2 join the Metropolitan Police Service in 1984?  
 3 A. I did.  
 4 Q. And did you serve within that force for approximately  
 5 4 years?  
 6 A. That's correct.  
 7 Q. Then did you leave policing for a period of time?  
 8 A. I did.  
 9 Q. And in 1996 did you join Greater Manchester Police?  
 10 A. Yes, that's right.  
 11 Q. Were you promoted to the rank of inspector in 2002?  
 12 A. I'm not sure if it was 2002.  
 13 Q. If I've got that date wrong --  
 14 A. The exam I took was in 2002; it was a little bit after  
 15 that.  
 16 Q. After that?  
 17 A. Yes, a little bit after.  
 18 Q. So shortly after 2002 you became an inspector?  
 19 A. Yes.  
 20 Q. And again, tell me if I've got this note wrong, you were  
 21 promoted to temporary chief inspector in 2010?  
 22 A. That's correct.  
 23 Q. And by the time we get to May 2017, had you been  
 24 confirmed in the rank of chief inspector or did you  
 25 remain a temporary chief inspector?

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1 A. I was still temporary.  
 2 SIR JOHN SAUNDERS: Hang on for a minute. Can people at the  
 3 back hear all right? It's just me, inevitably. I am  
 4 finding it just a bit difficult. You couldn't move  
 5 a bit further forward?  
 6 (Pause)  
 7 MR DE LA POER: In terms of the role that you were  
 8 undertaking in May 2017, the day job, so to speak, did  
 9 you work within the Police and Crime Commissioner's  
 10 Office?  
 11 A. That's correct, yes.  
 12 Q. Had you started in that role in about November 2016?  
 13 A. Yes, that's right.  
 14 Q. And in no more than a couple of sentences, if that's  
 15 possible, can you describe for us what that role  
 16 required you to do?  
 17 A. It was working with a series of partners and focusing  
 18 particularly on domestic violence and Witness Support.  
 19 Q. Thank you. In terms of your incident commander  
 20 training, did you complete Bronze commander training in  
 21 2006?  
 22 A. Yes, that's correct.  
 23 Q. And did you maintain that until ultimately it expired in  
 24 2016?  
 25 A. Yes.

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1 Q. During that period, was there any particular area of  
 2 Bronze command that you developed a particular interest  
 3 or a specialism in?  
 4 A. Due to the role I was in at the time I developed  
 5 a particular specialism in relation to roads policing  
 6 and the traffic Bronze role, but I did do a variety of  
 7 other roles as well.  
 8 Q. That's Bronze commander training?  
 9 A. Yes.  
 10 Q. In 2010 did you undertake Silver commander training?  
 11 A. Yes, that's correct.  
 12 Q. Did you have a valid accreditation as a Silver commander  
 13 in May 2017?  
 14 A. I did.  
 15 Q. Is that as an unarmed commander in terms of that  
 16 qualification?  
 17 A. Yes.  
 18 Q. So let's look now at perhaps the most relevant one given  
 19 the events of night. In 2014, did you undertake  
 20 tactical firearms commander training?  
 21 A. Yes, that's correct.  
 22 Q. And again, did you have a valid accreditation in that  
 23 role in May 2017?  
 24 A. Yes, I did.  
 25 Q. Before undertaking the tactical firearms commander

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1 training had you at any point in your career before that  
 2 had any involvement with firearms?  
 3 A. No, none whatsoever.  
 4 Q. So what was it in 2014 that led to you undertaking that  
 5 qualification?  
 6 A. Because of the role I was in, as chief inspector of  
 7 roads policing, it was part of the specialist operations  
 8 branch and there was a general expectation that you  
 9 would complete and be part of -- complete training and  
 10 be part of the cadre of on-call officers.  
 11 Q. Do you have your statement in front of you?  
 12 A. I do.  
 13 Q. In paragraph 10, so the second page, you identify some  
 14 of the differences between the tactical firearms  
 15 commander level of training and that of a specialist.  
 16 A. Yes, that's correct.  
 17 Q. I wonder if you could just, having reminded yourself of  
 18 what you say in your statement, amplify what your  
 19 understanding was about the difference between skill  
 20 level, training and understanding?  
 21 A. The tactical firearms commander training which I'd  
 22 undertaken allowed you to do -- not routine, there's  
 23 nothing routine about firearms, but allowed you to risk  
 24 assess and develop tactical plans for firearms  
 25 incidents. The specialist training, in my

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1 understanding, took you further than that for more  
 2 complex firearms incidents and the command of those.  
 3 Q. As we will see when we get to the chronology of 22 May,  
 4 you had a conversation in the course of the evening with  
 5 Superintendent Thompson who had the specialist training  
 6 accreditation, didn't he?  
 7 A. Yes, that's right.  
 8 Q. And a decision was taken in the course of that  
 9 conversation about who would or wouldn't be the tactical  
 10 firearms commander on the night. We'll come to the  
 11 detail of that, but a general question before we get to  
 12 it. Bearing in mind the level of training that you had  
 13 had up until May 2017, and given that you were in the  
 14 role of effectively the on-call tactical firearms  
 15 commander, were you adequately trained to take up the  
 16 tactical firearms commander role on 22 May?  
 17 A. In relation to more basic incidents, yes, I would  
 18 have -- I was fully qualified for that. However, the  
 19 skill set that had been developed as a specialist made  
 20 it more suitable for somebody who was trained in that to  
 21 take on that responsibility.  
 22 Q. We know that in May of 2017, and for some time, the  
 23 terrorist threat level was severe, meaning an attack was  
 24 highly likely.  
 25 A. Yes.

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1 Q. Looking back on it now, was it appropriate for a person  
 2 in your position, namely who didn't have the specialist  
 3 qualification, to be the on-call tactical firearms  
 4 commander or bearing in mind the risk that it was highly  
 5 likely somewhere, ought you to have had a higher level  
 6 of qualification or someone in your stead had that?  
 7 A. That's very difficult for me to answer. For the  
 8 majority of incidents I was perfectly adequately  
 9 qualified to take the role. In fact, on the night I was  
 10 expecting to take the role. It was only when I was  
 11 contacted by a specialist offering to come in and take  
 12 it that that decision was made.  
 13 Q. Of course, I don't want to be taken by that last  
 14 question to suggest that you should have taken it over  
 15 and run it for all time, I mean to have played your part  
 16 at some point in that role before you could be relieved;  
 17 do you see what I'm saying?  
 18 A. I do see what you're saying. It seems unlikely that  
 19 I would be running -- if I did take over that I'd be  
 20 running it for any length of time. I expected that  
 21 having made that voluntary offer to come in and take it,  
 22 that Mr Thompson would arrive maybe 20 minutes or half  
 23 an hour after me, so I would have actually taken command  
 24 for no more than 15 or 20 minutes maximum, and we'd have  
 25 to do a double handover -- there's always a risk period

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1 during a handover.  
 2 Q. We'll come back to the detail of that, but I just wanted  
 3 to ask you that general question before we get into the  
 4 22nd.  
 5 Before we turn to that, I would like to ask you  
 6 about MTFA and Operation Plato training. By May 2017  
 7 had you received any training specific to  
 8 Operation Plato and/or a marauding terrorist firearms  
 9 attack?  
 10 A. I had. I can't remember much of the detail now but  
 11 I definitely had.  
 12 Q. Have you been shown a diary entry which indicates that  
 13 you were certainly scheduled to attend one in January of  
 14 2017?  
 15 A. I have, yes.  
 16 Q. Is it your recollection that you attended that training  
 17 or that you didn't?  
 18 A. I believe I did.  
 19 Q. Once we get to May 2017, do you think you had an  
 20 adequate understanding of what Operation Plato was?  
 21 A. Broad-brush, yes.  
 22 Q. What was your understanding about whether or not -- and  
 23 I am talking May 2017, before the incident -- whether or  
 24 not, if Operation Plato was declared, there would be  
 25 zoning?

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1 A. Yes, I knew that.  
 2 Q. Was it your understanding that there would always be  
 3 zoning or that there would be an option to zone?  
 4 A. I thought it was mandated, but I couldn't say for  
 5 certain.  
 6 Q. Well, again, we'll come back to what you knew about  
 7 Operation Plato and what you didn't on the night.  
 8 How was it in May of 2017 you came to be the TFC  
 9 cadre cover?  
 10 A. We were scheduled periodically and every 6 weeks you  
 11 would do a week of days or a week of nights and in  
 12 between you'd have done a weekend of days or nights. It  
 13 was a very regular expectation.  
 14 Q. You use the word expectation. Was it voluntary for you  
 15 to be on that rota, if that's the correct description of  
 16 it?  
 17 A. Yes, it was.  
 18 Q. And therefore does it follow that that was something  
 19 that you had volunteered to do?  
 20 A. I absolutely had, yes.  
 21 Q. Had you ever had experience before 22 May 2017 of acting  
 22 as a TFC in an actual incident?  
 23 A. Yes, I had.  
 24 Q. Give us a flavour, please, of the type of incidents that  
 25 you acted as TFC in relation to.

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1 A. On—street shootings, kidnaps, robberies. They're the  
 2 most frequent ones.  
 3 Q. Had you been the first appointed TFC in relation to any  
 4 of those incidents?  
 5 A. Yes, directly .  
 6 Q. So in other words, taking over as the incident was  
 7 unfolding?  
 8 A. Yes.  
 9 Q. Had any of those incidents involved anything which was  
 10 at least in the early stages thought to be  
 11 terrorist —related?  
 12 A. No.  
 13 Q. Had you undertaken any exercise, whether tabletop or  
 14 live action, involving an MTFA and Operation Plato  
 15 zoning?  
 16 A. Yes, I did, in relation to the airport and one of the  
 17 terminals there.  
 18 Q. When was that, please, so far as you can recall? It 's  
 19 not meant to be a memory test; we can find the date.  
 20 A. I would say 2016, but I can't tell you what month.  
 21 Q. Was it before or after the training you received in  
 22 early 2017?  
 23 A. I don't know, sorry.  
 24 Q. We'll investigate that date and I'm sure GMP will be  
 25 able to help us with that.

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1 Finally by way of training, JESIP. Had you received  
 2 any training in JESIP?  
 3 A. Yes, I had.  
 4 Q. What was the nature of that training, please?  
 5 A. I believe I did a one—day tabletop—type multi—agency  
 6 exercise. It would certainly have been an NCALT  
 7 package, I couldn't give you more details.  
 8 Q. That's the e—learning?  
 9 A. That's right, yes.  
 10 Q. In relation to the training that you had had for  
 11 Operation Plato, what, if anything, was your  
 12 understanding in May 2017 as to the interface between  
 13 Operation Plato and the JESIP principles? A rather  
 14 complicated question but I think you understand what  
 15 I mean.  
 16 A. I think I understand, but could you just repeat it  
 17 regardless?  
 18 Q. You have Operation Plato, which you had training in, and  
 19 you'd had training in JESIP.  
 20 A. Yes.  
 21 Q. For Operation Plato, the training in its narrow sense  
 22 will focus upon the firearms response.  
 23 A. Yes.  
 24 Q. JESIP is multi—agency.  
 25 A. Yes.

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1 Q. What, if any, training had you had about how the two  
 2 interact and how JESIP principles may or may not be  
 3 relevant during an Operation Plato incident?  
 4 A. I think they're critical , those communications, for  
 5 everybody to have a common understanding of the  
 6 scenario, what's happening. I'm aware from the hot,  
 7 warm and cold zones who's allowed into which area.  
 8 Obviously they can move. I think that's probably the  
 9 majority of it other than that tactical awareness from  
 10 all the different agencies should be taking place in  
 11 a location near to the incident, I think an FCP.  
 12 Q. So it's not one or the other it's both at the same time?  
 13 A. Yes.  
 14 Q. That was your understanding in May 2017?  
 15 A. It was.  
 16 Q. It's to that that I'd like now to turn, please. On  
 17 22 May 2017, had you been to work as normal during the  
 18 day?  
 19 A. I had.  
 20 Q. What time were you due to undertake the TFC cadre role?  
 21 A. From 7 pm that evening.  
 22 Q. In order to undertake that role, did you need to be in  
 23 any particular place or could you be anywhere you chose?  
 24 A. You could be anywhere you chose at that time.  
 25 Q. Was there any requirement for you to be within a certain

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1 maximum distance from force headquarters?  
 2 A. No.  
 3 Q. As far as you were aware, had any assessment been made  
 4 about where your home address was in relation to  
 5 Manchester city centre for the purpose of you being on  
 6 that rota?  
 7 A. None that I'm aware of.  
 8 Q. Would it have been permissible, as you understood the  
 9 rules, for you to have gone further that night whilst  
 10 you were undertaking that role than your home address?  
 11 A. I think it would have been silly to do so but I don't  
 12 think there was actually any restriction . But  
 13 I wouldn't have done it.  
 14 SIR JOHN SAUNDERS: Can you give me some idea of — it's  
 15 going to be a real average — how often on average you'd  
 16 be called on when you're on duty to do your TFC role?  
 17 Once a week, once a month?  
 18 A. I seemed to attract quite a lot of jobs, so the previous  
 19 week that I'd done days — sorry, nights — I'd picked  
 20 up a kidnap and was about to go home around 7.30 and  
 21 I picked up a kidnap so I didn't go home until the  
 22 following morning once I'd handed over to the morning  
 23 TFC. I picked up quite a few jobs, not necessarily as  
 24 late as this incident happened.  
 25 SIR JOHN SAUNDERS: On an average week of being on duty

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1 would you expect that you would be called out once?  
 2 A. I tended to stay in work until a little bit later in the  
 3 evening. Not as late as 10.30.  
 4 SIR JOHN SAUNDERS: Thank you.  
 5 MR DE LA POER: In your role as the cadre TFC for that  
 6 night, was it your understanding that you would always  
 7 go to force HQ if you were called out or might you be  
 8 required to go to other locations in that role?  
 9 A. I could have been — and in fact on a previous occasion  
 10 had gone to a different location.  
 11 Q. To act as a ground—assigned?  
 12 A. Not as a ground—assigned, no, but it was a more  
 13 appropriate location to go to because of the incident  
 14 and how it was unfolding.  
 15 Q. We don't need to go any further than that.  
 16 The role may have required you then to go  
 17 potentially anywhere within the Greater Manchester  
 18 Police area?  
 19 A. Yes.  
 20 Q. But was it often the case that force HQ was the right  
 21 place for you to go?  
 22 A. I don't think I'd been to force HQ previously to be  
 23 honest, I think I'd — was more likely to go on to  
 24 another police premises — I don't think I should say  
 25 where.

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1 Q. That's fine. Was that any of the operation control  
 2 rooms at the time?  
 3 A. No.  
 4 Q. Okay. We won't go further than that.  
 5 So you went home but you were on call. Is that  
 6 a fair way of describing —  
 7 A. Absolutely.  
 8 Q. — your position? Did you have access when at home to  
 9 any equipment that you might need when undertaking the  
 10 TFC role?  
 11 A. Yes, I'd taken my police radio and body armour with me.  
 12 Q. Did you have access to a blue light vehicle?  
 13 A. I did.  
 14 Q. I'm very anxious not to know what your address was  
 15 at the time, although it may now be different.  
 16 Approximately how long under blue lights would it take  
 17 you to drive from your home address at the time to force  
 18 HQ?  
 19 A. I think on that particular night it took 30 minutes.  
 20 Q. Three zero?  
 21 A. Yes.  
 22 Q. Was that more or less than your expectation before you  
 23 undertook that journey?  
 24 A. I didn't have an expectation to be honest. But I knew  
 25 that that — the distance I was travelling was likely to

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1 take something around there, even with blue lights.  
 2 SIR JOHN SAUNDERS: Again, you needn't tell us where, but  
 3 were you normally based at force HQ —  
 4 A. I was, yes.  
 5 SIR JOHN SAUNDERS: — at the time.  
 6 MR DE LA POER: Having set the scene in that way, there came  
 7 a point in the evening — we're going to have a look at  
 8 a schedule now which I hope is in front of you —  
 9 A. Yes.  
 10 Q. — where you received a telephone call from Ian Randall?  
 11 A. That's correct, yes.  
 12 Q. You'll immediately understand I don't want to go into  
 13 the detail of it, but were you dressed for work at the  
 14 point you received that telephone call?  
 15 A. No, I wasn't.  
 16 Q. So once that call was completed, that would be one of  
 17 the first steps that you'd have to take —  
 18 A. Yes.  
 19 Q. — to ready yourself? Let's just have a look at that  
 20 entry now. Others don't have it in front of them but we  
 21 did look at this with Mr Randall on Friday. It's  
 22 entry 1934 in the left —hand column and can you confirm  
 23 it's timed at 22.44.23?  
 24 A. Yes, sir.  
 25 Q. In the course of that conversation did Mr Randall tell

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1 you, and I quote:  
 2 "We've had an explosion in the city centre at the  
 3 MEN Arena"?  
 4 A. That's correct.  
 5 Q. Did he go on to tell you that Night Silver was aware?  
 6 A. Correct, yes.  
 7 Q. Did you know who Night Silver was that night?  
 8 A. I did.  
 9 Q. He then said:  
 10 "The FDO's absolutely mad busy at the moment, he's  
 11 asked me to give you a ring."  
 12 Does he then give you the FWIN?  
 13 A. He did.  
 14 SIR JOHN SAUNDERS: Would you always know who Night Silver  
 15 was as part of your job —  
 16 A. It would be foolish not to know.  
 17 SIR JOHN SAUNDERS: — if you're on duty?  
 18 A. Yes. It's something I'd always have established before  
 19 I went home.  
 20 MR DE LA POER: Was that just for the purpose of  
 21 establishing a name or did you have a direct contact  
 22 number for that person?  
 23 A. I'm not sure if I had their phone number in my phone.  
 24 He wasn't somebody I knew particularly well. I knew who  
 25 he was.

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1 Q. You are speaking here about Superintendent Arif Nawaz?  
 2 A. That's correct, yes.  
 3 Q. But at the very least you would have a name to ask to be  
 4 put through to if you needed to speak to them?  
 5 A. Yes.  
 6 Q. And does the call conclude by Mr Randall informing you  
 7 that there were:  
 8 " ... several casualties injured at the moment and  
 9 we're just trying to find out what's going on"?  
 10 A. Yes, that's correct.  
 11 Q. And a brief discussion about what concert was on that  
 12 evening and then the call ended?  
 13 A. That's correct.  
 14 SIR JOHN SAUNDERS: You even made a comment normally  
 15 attributed to judges about not knowing who Ariana Grande  
 16 was!  
 17 A. I'm sorry.  
 18 SIR JOHN SAUNDERS: That's all right.  
 19 MR DE LA POER: How long was it between the end of that call  
 20 and when you were in your blue light vehicle?  
 21 A. Approximately 2 or 3 minutes, no more than that.  
 22 Q. What you say in your statement is once you were in  
 23 a position to do so, you began monitoring the firearms  
 24 channel?  
 25 A. That's correct, yes.

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1 Q. You'll know, Ms Buckle, we are not referring to channel  
 2 numbers in the course of this inquiry, but we're going  
 3 to refer to that as the national firearms channel.  
 4 A. Thank you.  
 5 Q. As you were driving to force HQ, were you able to  
 6 monitor what was being said on that channel?  
 7 A. I was, yes.  
 8 Q. We know you ended up at force HQ. When you set off from  
 9 your home address where was it you were driving to?  
 10 A. I wasn't entirely sure from Ian Randall's conversation  
 11 what had happened at that point. I actually thought it  
 12 was an explosion and fire as in a gas explosion or  
 13 something. There wasn't a lot of detail. I just  
 14 thought, based on the level of conversation, the pace of  
 15 the conversation, that actually there was something very  
 16 serious going on and I just made the assumption that:  
 17 get in the car, start making your way and find out  
 18 en route. So I didn't have a predetermined destination  
 19 at that point.  
 20 Q. We'll come to the detail of it, but when was it that you  
 21 settled upon where you were going?  
 22 A. When I'd spoken to Mark Dexter.  
 23 Q. We'll come to that conversation in a moment. I would  
 24 like, although it will mean we'll have to go back over  
 25 the chronology, just to establish what you heard on the

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1 firearms channel and then we'll come to the phone calls  
 2 that you were making whilst those broadcasts were being  
 3 made.  
 4 As you drove from your home address to as you ended  
 5 up force HQ, did you at any point hear mention of  
 6 Operation Plato?  
 7 A. Yes, I did.  
 8 Q. So does it follow that you knew by the time you had  
 9 arrived at force HQ that Operation Plato had been  
 10 declared?  
 11 A. Yes, I did.  
 12 Q. We're just going to consider some of the telephone calls  
 13 that you made in the course of or received in the course  
 14 of your journey. I asked you to consider this before we  
 15 came in today. The reference for anybody who wants to  
 16 have a look at it, I'm thinking particularly of  
 17 Mr Horwell and GMP, is {INQ029035/1}. You won't have  
 18 that in front of you, no one else will, that is just for  
 19 the benefit of those who are listening who do have  
 20 access to it.  
 21 There is an entry attributed to Paul Lawton in which  
 22 he says that he has spoken to you.  
 23 A. Yes, that's correct.  
 24 Q. And that is timed at 22.52.  
 25 A. I believe so.

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1 Q. In your witness statement you indicated in the course of  
 2 the early stages of the evening you spoke to  
 3 Paul Lawton.  
 4 A. Yes, that's right.  
 5 Q. I think at the time you attributed it to a time of  
 6 23.18.  
 7 A. It's an error, sorry.  
 8 Q. No need to apologise at all. The precise timing we can  
 9 perhaps establish with Mr Lawton if he has a better  
 10 recollection of it, but as you were driving to force HQ  
 11 did you speak to Paul Lawton?  
 12 A. I did.  
 13 Q. And who was Paul Lawton?  
 14 A. He was the firearms tac adviser and he would have been  
 15 my tac adviser.  
 16 Q. Do you know what that stands for?  
 17 A. Er --  
 18 Q. Is it short for tactical?  
 19 A. It is.  
 20 Q. So he is the firearms tactical adviser. What is the  
 21 role of a firearms tactical adviser so far as you were  
 22 concerned?  
 23 A. It's to give advice and suggestions in relation to  
 24 tactics that can be used as part of your tactical plan  
 25 as a tactical firearms commander.

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1 Q. I'll paraphrase here and see if you agree or disagree:  
 2 are they a person to whom a tactical firearms commander  
 3 can turn in order to seek advice about what the next  
 4 best step may be or to check with in terms of a big  
 5 decision they might be about to make?  
 6 A. The decision is always the tactical firearms commander's  
 7 but the advice will come from the tactical adviser.  
 8 Q. And in terms of the dynamic as you understood it, is it  
 9 two-way or is it always the tactical adviser cutting in  
 10 or how does it work, that relationship?  
 11 A. It's two-way. But as I say, the final decision always  
 12 rests with the tactical firearms commander.  
 13 SIR JOHN SAUNDERS: What particular skills would a firearms  
 14 tactical adviser had to have?  
 15 A. They'd have more in-depth knowledge of the tactics that  
 16 are available and how they would be delivered.  
 17 SIR JOHN SAUNDERS: And always be reasonably experienced?  
 18 A. Definitely, very experienced.  
 19 SIR JOHN SAUNDERS: Thank you.  
 20 MR DE LA POER: In terms of the way that you worked with  
 21 a tactical firearms adviser, was it your practice to  
 22 consult them before making decisions or did it depend  
 23 upon the nature of the decision under consideration or  
 24 the time that you had? How does it work in practice?  
 25 A. As a tactical firearms commander you are expected to

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1 consult with them before making a decision. Clearly  
 2 there are going to be moments when you can't do that  
 3 because there isn't enough time, but the majority of  
 4 time you do consult with them.  
 5 Q. In your daybook there is an untimed entry as to your  
 6 conversation with Mr Lawton. I'll just read it out --  
 7 we can bring it up on screen but it was to the effect:  
 8 "Consider additional ARVs."  
 9 A. Yes.  
 10 Q. Does that accord with the broad strokes of the  
 11 conversation you had with Mr Lawton?  
 12 A. Yes, it does.  
 13 Q. Did you discuss with Mr Lawton, so far as you can  
 14 recall, the Operation Plato declaration?  
 15 A. I don't think so.  
 16 SIR JOHN SAUNDERS: Do you remember considering ARVs, more  
 17 ARVs for what purpose?  
 18 A. No, I can't remember, I'm sorry.  
 19 SIR JOHN SAUNDERS: Thank you.  
 20 MR DE LA POER: Bearing in mind that -- well, let's take  
 21 a step back. At the point that you spoke to Mr Lawton,  
 22 what was your expectation about whether you would or  
 23 would not be the tactical firearms commander?  
 24 A. I was expecting to be the tactical firearms commander.  
 25 Q. That being the case, do you think that Operation Plato

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1 was something that you should have spoken to him about  
 2 at that stage or was it not appropriate?  
 3 A. I'm not sure on the exact timing, I didn't -- as to when  
 4 I became aware Plato had been called. I certainly  
 5 became aware of it before I arrived at force HQ, but  
 6 I can't remember if it's before I spoke to Paul Lawton  
 7 or after.  
 8 Q. Well, in due course we will set out the occasions on the  
 9 firearms channel when Operation Plato was mentioned, but  
 10 you are right to observe that there was certainly one  
 11 some minutes before you spoke to Mr Lawton, but there  
 12 may have been others.  
 13 A. Yes.  
 14 Q. That conversation with Mr Lawton -- next we're going to  
 15 go back to your schedule that you have in front of you,  
 16 I hope. As I say, I tentatively suggest that that call  
 17 will have been some time before 22.52, but we'll get to  
 18 the bottom of that.  
 19 At 22.53 we have, from mobile telephone records,  
 20 contact between you and Mark Dexter.  
 21 A. That's correct, yes.  
 22 Q. So far as you were concerned, who was Mark Dexter on the  
 23 night of 22 May?  
 24 A. He was another tactical firearms commander. I can't  
 25 honestly remember whether I knew that he had done his

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1 specialist firearms commander training before or after  
 2 the -- I don't know when I became aware that he had done  
 3 it. I also knew he was the firearms chief inspector for  
 4 the force. I knew he wasn't on duty; I was the cadre  
 5 TFC.  
 6 Q. What did you understand to be the firearms  
 7 chief inspector for the force? What does that mean?  
 8 A. He was in charge of the firearms unit and other areas of  
 9 responsibility as well.  
 10 Q. The telephone records indicate that the conversation was  
 11 1 minute and 4 seconds long.  
 12 A. That's right.  
 13 Q. Just as best you're able to now, tell us how that  
 14 conversation unfolded.  
 15 A. I'd heard on the radio that Mark Dexter had said, "Tell  
 16 her to go to force HQ, I'm going to ground--assigned".  
 17 We had that conversation because I said to him, "Have  
 18 you actually got protective equipment with you?  
 19 I have", but he said, "I'll get it, I'm going  
 20 ground--assigned". When I say it like that, it was much  
 21 more of an adult conversation as to who was most  
 22 appropriate to go as ground--assigned, but I also knew  
 23 he'd be further ahead on the journey than I was.  
 24 Q. What we've been able to identify -- I'll give there  
 25 reference for everybody to check that this is correct,

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1 but Mr Lopez, not for the screen, but from a document  
 2 prepared by GMP which is {INQ040470/1} at 22.51.45 there  
 3 was a broadcast from Chief Inspector Dexter trying to  
 4 find out who cadre cover was. Did you hear that?  
 5 A. I did hear that, yes.  
 6 Q. Did you attempt to reply?  
 7 A. I did. It was impossible to get on the radio.  
 8 Q. In fact, the next entry in that schedule, which you  
 9 don't have in front of you, but again people can check  
 10 it's on {INQ040470/2}, we have a broadcast from the FDO  
 11 saying:  
 12 "Obviously I've declared Op Plato."  
 13 So that's the sequence of those broadcasts, but you  
 14 attempted to get through and were not able to. Then did  
 15 you call him or did he call you?  
 16 A. He called me.  
 17 Q. And that takes us to the conversation at 22.53?  
 18 A. Yes.  
 19 SIR JOHN SAUNDERS: As you're going in, and you don't know  
 20 where you're going, do you have the choice of going to  
 21 headquarters or some appropriate centre or going to the  
 22 scene? Were they in your mind at the time?  
 23 A. Yes, absolutely. I hadn't -- I didn't know that  
 24 Mark Dexter was going to be on the radio, didn't know  
 25 he was coming in, so I couldn't make that decision until

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1 such time as I got more information.  
 2 SIR JOHN SAUNDERS: If you hadn't spoken to anyone where  
 3 would you have gone to?  
 4 A. I anticipate ground--assigned.  
 5 SIR JOHN SAUNDERS: Because that's more important on an  
 6 emergency basis?  
 7 A. Yes, it is.  
 8 MR DE LA POER: Was it ground--assigned because it was  
 9 a firearms incident, terrorist incident or an  
 10 Operation Plato incident?  
 11 A. Plato. But obviously there was terrorism involved but  
 12 Plato was the driver for that.  
 13 Q. You have indicated that I don't think you have played  
 14 the role of ground--assigned before?  
 15 A. Correct.  
 16 Q. So clearly ground--assigned isn't a role that is required  
 17 in every firearms operation?  
 18 A. No, absolutely not.  
 19 Q. So what was it about this one that made you think there  
 20 needs to be a ground--assigned?  
 21 A. The scale that was becoming apparent from the  
 22 information I was receiving, the location which I don't  
 23 know well, I don't know the building well, and the  
 24 circumstances of what had happened.  
 25 Q. Was there any conversation between you and

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1 Chief Inspector Dexter about Operation Plato in that  
 2 call?  
 3 A. No, I don't think so. We didn't have time to extend the  
 4 conversation.  
 5 Q. So in terms of what you did discuss, an adult, as you've  
 6 described it, discussion as to who was going to be  
 7 ground--assigned?  
 8 A. Yes, that's correct.  
 9 Q. Who offered first that it should be Mr Dexter who goes  
 10 to the scene?  
 11 A. He offered first.  
 12 Q. Did that seem to you to be a good option or a bad  
 13 option?  
 14 A. I knew he didn't have body armour or protective  
 15 equipment, so it seemed like a bad idea, but he promised  
 16 me he'd get it and I knew he would be further ahead on  
 17 the journey.  
 18 Q. I was just going to ask you about that. We know that  
 19 you got to force HQ at 23.15 or thereabouts.  
 20 A. Yes.  
 21 Q. And in terms of the route that you took, would that have  
 22 taken you closer to the arena before you got there or  
 23 would you have had to go beyond force HQ in order to get  
 24 to the arena?  
 25 A. I could have got to the arena quicker.

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1 Q. You could have got to the arena quicker?  
 2 A. Yes, but marginally.  
 3 Q. Marginally? So shortly before 23.15 you could have been  
 4 on site at the arena, based on what we know to be your  
 5 timings from the night?  
 6 A. Yes, that's correct.  
 7 Q. And you would have been there with body armour?  
 8 A. Yes, I would.  
 9 Q. Did Chief Inspector Dexter tell you what time he thought  
 10 he could be at the arena?  
 11 A. No, he didn't.  
 12 Q. So what was said in the conversation that led you to  
 13 conclude that he would arrive before you?  
 14 A. The fact that he'd been aware of the incident before  
 15 I was and therefore had set off and I knew the rough  
 16 location of where he lived as to how long it would take  
 17 him to get to the city centre.  
 18 Q. Again I don't want to go into any operational details,  
 19 but you had in mind that he had undertaken to you, if  
 20 that's the right word and tell me if it's not, that he  
 21 would get body armour before he went?  
 22 A. Yes.  
 23 Q. Even though he may be further progressing his journey,  
 24 how much longer might that add to his journey in your  
 25 estimation at the time?

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1 A. It certainly would add, but I couldn't give you any  
 2 detail .  
 3 Q. Was there anything else said in the course of your  
 4 conversation with Chief Inspector Dexter at 22.53 that  
 5 we haven't covered?  
 6 A. No.  
 7 Q. We'll just pause there, given that we have got to that  
 8 point in the incident and a discussion has taken place  
 9 between you and Chief Inspector Dexter about  
 10 ground—assigned. Help us with your understanding at the  
 11 time about who, if anyone, had the responsibility to  
 12 appoint a ground—assigned?  
 13 A. I'm not sure.  
 14 Q. I'll put my question another way just to make sure we're  
 15 understanding each other: in your understanding in  
 16 May 2017, was that a role that a person could  
 17 effectively self—deploy into or was it a role that  
 18 required some other commander to make an appointment?  
 19 A. I'm sorry, I don't know.  
 20 Q. Did that sort of thinking in terms of command structure  
 21 and responsibility enter your mind at that point of the  
 22 incident?  
 23 A. I'm not actually sure. I knew that you needed both  
 24 a ground—assigned and a more strategically located TFC,  
 25 but no, I don't know.

1 SIR JOHN SAUNDERS: And you two failing to agree, who would  
 2 then take the decision or you don't know that either,  
 3 really?  
 4 A. We'd always had a very adult and professional  
 5 relationship. I don't anticipate that happening.  
 6 SIR JOHN SAUNDERS: Okay.  
 7 MR DE LA POER: If it came to it in terms of a disagreement,  
 8 an adult disagreement, in your view were either of you  
 9 in terms of qualification better qualified to take the  
 10 role of ground—assigned?  
 11 A. As I say, I can't remember whether I knew at that  
 12 point — I certainly did before the end of the evening  
 13 that he was a specialist TFC. I can't remember at what  
 14 point I became aware of that. Certainly as a specialist  
 15 TFC he is better equipped than I am. If I'd not known  
 16 that at the time — sorry.  
 17 SIR JOHN SAUNDERS: I understand all that, but in reality,  
 18 as you are the on—duty TFC, actually it's your call,  
 19 isn't it, at the end of the day? No doubt it's the  
 20 right call to get him to do that, but isn't that your  
 21 call?  
 22 A. Absolutely, yes. I would not disagree with you, sir .  
 23 SIR JOHN SAUNDERS: Okay.  
 24 MR DE LA POER: Next in the schedule, before we reach force  
 25 HQ, we can see at entry 4884 that there is recorded at

1 23.10, for 51 seconds, telephone contact between you and  
 2 Superintendent Craig Thompson.  
 3 A. Yes, that's correct .  
 4 Q. Was he somebody who you knew before that evening?  
 5 A. I did, yes.  
 6 Q. Who called who?  
 7 A. He called me.  
 8 Q. To the best of your recollection , what was the content  
 9 of the conversation you had with Superintendent  
 10 Thompson?  
 11 A. He rang me and told me that he wanted to take the job,  
 12 TFC, as a specialist .  
 13 Q. So the sequence is, as you're leaving home, you have in  
 14 mind, although it's by no means solid, that you are  
 15 going to be ground—assigned, you speak to Mr Dexter,  
 16 that then leads you to take the strategic tactical  
 17 firearms; is that right so far?  
 18 A. I don't think I even had in mind that I was necessarily  
 19 going ground—assigned at that point. I can't be  
 20 certain, I'm sorry.  
 21 Q. Not at all. It's important that you give your evidence  
 22 to the best of your recollection . Whatever your  
 23 thoughts were about ground—assigned, Mr Dexter contacts  
 24 you?  
 25 A. Yes.

1 Q. And you agree between yourselves that that's what he's  
 2 going to do and then, about 15 or so minutes later,  
 3 a call from Mr Thompson to, who indicates that he is  
 4 intending to take the tactical firearms commander  
 5 role —  
 6 A. Yes.  
 7 Q. — away from the scene?  
 8 A. Yes.  
 9 Q. We've seen in other contexts that it is perfectly  
 10 acceptable within a command structure for a person to  
 11 take on a role and then be relieved by someone better  
 12 qualified .  
 13 A. Yes.  
 14 Q. The conversation that you had with Superintendent  
 15 Thompson, what was he saying in relation to that, ie was  
 16 he saying, "You take it over, I will relieve you", or  
 17 was he saying, "You are not to take up that role because  
 18 I will take it up when I arrive"?  
 19 A. That was my understanding, the second version.  
 20 Q. The second version?  
 21 A. Yes.  
 22 Q. Was there any express instruction from him that you  
 23 should not take up the tactical firearms commander role  
 24 away from scene?  
 25 A. I can't remember the words of the conversation but that

1 was my understanding.  
 2 SIR JOHN SAUNDERS: Is he giving you an order? I know he's  
 3 a senior officer to you.  
 4 A. No, I don't think so.  
 5 SIR JOHN SAUNDERS: So it's another adult conversation?  
 6 A. Yes, sir.  
 7 MR DE LA POER: Obviously we have a principle that the  
 8 inquiry is familiar with, that it's role not rank.  
 9 A. Yes, I agree.  
 10 Q. At that moment, you having agreed it with Mr Dexter,  
 11 that was your role or was to be your role?  
 12 A. That's correct, yes.  
 13 Q. And this isn't an instruction from a Gold commander or  
 14 a strategic firearms commander, this is just a colleague  
 15 within the force. What --  
 16 A. Do you mean Craig, sorry?  
 17 Q. Yes.  
 18 A. I knew Craig was a specialist TFC.  
 19 Q. That's what I was getting to. What was it in your mind  
 20 that led you to conclude that that is something that  
 21 should happen?  
 22 A. Because of the complexities that I understood were  
 23 happening on the ground and obviously the wider element,  
 24 thinking that there was a much wider risk as well.  
 25 Q. At this point of the evening, you are about 5 minutes

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1 away from force HQ; is that correct?  
 2 A. Probably even less.  
 3 Q. So you are in a position within just a few minutes to be  
 4 in the Silver room?  
 5 A. That's correct, yes.  
 6 Q. Was it from within the Silver room that you would have  
 7 taken up the role of tactical firearms commander?  
 8 A. Yes, that's correct.  
 9 Q. When you spoke to Superintendent Thompson, did you have  
 10 a discussion with him about how long it would take him  
 11 to get to the Silver room?  
 12 A. Sadly, no. He did indicate it wouldn't be long but it  
 13 was longer than I was expecting.  
 14 Q. Did you make clear to Superintendent Thompson just how  
 15 few minutes it would be before you were in a position to  
 16 be in the Silver room?  
 17 A. I don't think so.  
 18 Q. So would he have had any idea that you were only minutes  
 19 away from that room?  
 20 A. I don't think so. I don't know.  
 21 Q. Do you think that that was information that you should  
 22 have given him in the course of this conversation?  
 23 A. With the benefit of hindsight, maybe, yes.  
 24 Q. Well, is it fair to say that it is obviously relevant to  
 25 the decision-making around who is going to be the

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1 tactical firearms commander?  
 2 A. It has some relevance certainly, yes.  
 3 Q. Because, for example, if you'd said, "I can be in the  
 4 Silver room in 5 minutes, how long do you think it will  
 5 take you?", might that not have prompted a conversation  
 6 around whether or not you should take up the role to  
 7 cover for the period until he arrived?  
 8 A. I can understand what you're saying. I don't think the  
 9 conversation covered that.  
 10 Q. No. I was really asking whether that was something that  
 11 should have been covered by the conversation.  
 12 A. Possibly, yes.  
 13 Q. At this point, your conversation with Superintendent  
 14 Thompson, did you have a clear understanding that the  
 15 incident or the explosion had taken place 40 minutes  
 16 previously?  
 17 A. Yes.  
 18 Q. In other words, you knew how long had elapsed --  
 19 A. Yes.  
 20 Q. -- since --  
 21 A. Approximately, yes.  
 22 Q. Obviously you heard about it at 22.44, it's whether or  
 23 not by 23.10 that you understood, even by that stage,  
 24 there had been some time which had elapsed?  
 25 A. Yes, I did.

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1 Q. Up until somebody took over the role of the tactical  
 2 firearms commander, who in your understanding would be  
 3 the tactical firearms commander?  
 4 A. The FDO.  
 5 Q. In their initial tactical --  
 6 A. Yes.  
 7 Q. Based upon your experience up until 22 May, about how  
 8 long was it your expectation that an FDO ought to be the  
 9 initial tactical firearms commander before they were  
 10 relieved?  
 11 A. It wouldn't normally be as long as it was. I couldn't  
 12 give you an exact time frame.  
 13 Q. Would it normally be as long as 45 minutes?  
 14 A. That would give -- if I had taken it over, it would have  
 15 been at least 45 minutes, I think.  
 16 Q. Just before we get to that, in your experience is  
 17 45 minutes a long period of time for somebody to be  
 18 initial tactical firearms commander, a short period or  
 19 does it just vary so widely?  
 20 A. I think it varies quite a lot.  
 21 Q. What would be the longest in your experience, other than  
 22 this incident, that a person has remained the initial  
 23 tactical firearms commander?  
 24 A. An hour.  
 25 SIR JOHN SAUNDERS: In this case it's dependent on how long

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1 it takes you to get in.  
 2 A. Yes.  
 3 SIR JOHN SAUNDERS: So it depends a lot on how far away the  
 4 tactical firearms commander lives if they're at home.  
 5 A. Yes.  
 6 SIR JOHN SAUNDERS: There may be some who an hour away?  
 7 A. I don't know any. I can only comment on myself, sir.  
 8 MR DE LA POER: When you had your conversation with  
 9 Superintendent Thompson, did you have in your mind at  
 10 all whether or not it was important that the initial  
 11 tactical firearms commander was relieved as soon as  
 12 possible?  
 13 A. Yes, I did.  
 14 Q. You arrived at force HQ at around 23.15; is that  
 15 correct?  
 16 A. That's correct, yes.  
 17 Q. We have good reason to believe that, don't we, because  
 18 we have a daybook entry from you timed 23.18?  
 19 A. Mm—hm.  
 20 Q. Will you have made that daybook entry once you arrived  
 21 in the Silver room?  
 22 A. Yes, that's correct.  
 23 Q. And will you have made it at the time you were making it  
 24 or very shortly thereafter?  
 25 A. Within a minute, yes.

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1 Q. As you were arriving at force headquarters did you see  
 2 anyone else with relevance to the incident?  
 3 A. I saw ACC Ford.  
 4 Q. At the time you saw her, was there any conversation  
 5 between you?  
 6 A. I think I might have told her that Craig was coming in,  
 7 Craig Thompson was coming in.  
 8 Q. At the time you spoke to her did you know that she was  
 9 to be the strategic firearms commander?  
 10 A. Yes, I did.  
 11 Q. So what did you say to her about Superintendent  
 12 Thompson?  
 13 A. I think I just said, "He's on his way in to take over".  
 14 Q. And did you make clear from whom he would be taking  
 15 over?  
 16 A. No.  
 17 Q. Did you say anything to ACC Ford about what your role  
 18 would be?  
 19 A. No.  
 20 Q. Did you say anything to ACC Ford about the fact that you  
 21 had been the cadre TFC that night?  
 22 A. No.  
 23 SIR JOHN SAUNDERS: Would she have known that?  
 24 A. I would expect that she would have known it, yes.  
 25 SIR JOHN SAUNDERS: And just as you knew she was on duty?

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1 A. That's correct, yes.  
 2 SIR JOHN SAUNDERS: Right.  
 3 A. There was a daily circulation as to who was on what  
 4 role.  
 5 MR DE LA POER: So to ACC Ford, Superintendent Thompson is  
 6 coming in to take over --  
 7 A. I think --  
 8 Q. -- or words to that effect?  
 9 A. Yes.  
 10 Q. Within the world that you operated and the shorthand  
 11 that you can use, would that convey clearly in your view  
 12 that Superintendent Thompson was to take over the  
 13 tactical firearms commander role?  
 14 A. I think so, but you may have to ask her.  
 15 Q. Certainly it was your intention to convey that  
 16 information?  
 17 A. Yes, it was.  
 18 Q. At that time did you -- other than that phrase or the  
 19 words to that effect that you have told us about did you  
 20 say anything to make clear to ACC Ford that you would  
 21 not be taking up the role in the interim?  
 22 A. No, I don't think so.  
 23 SIR JOHN SAUNDERS: Is she someone you worked with  
 24 regularly?  
 25 A. I have done, yes. Had done.

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1 SIR JOHN SAUNDERS: Thank you.  
 2 MR DE LA POER: Was there any conversation before you broke  
 3 off contact with ACC Ford at that stage about  
 4 Operation Plato?  
 5 A. I don't think there was. I'm not 100% sure, I'm sorry.  
 6 Q. When you arrived in the Silver control room, what did  
 7 you think your role was that night?  
 8 A. I expected to be the TFC and that had clearly just been  
 9 taken from me. I was left in a period where I didn't  
 10 have the greatest clarity of role, but I expected that  
 11 once Craig came in, I would become his deputy.  
 12 Q. At any point during that period when you lacked clarity,  
 13 did you speak to the strategic firearms commander,  
 14 ACC Ford, to ask her what you should do?  
 15 A. No, I didn't.  
 16 Q. Thinking about it now, would that have been an  
 17 appropriate conversation for you to have had with her?  
 18 A. Quite possibly. I was very conscious that Plato had  
 19 been called and there was a potential for having  
 20 a further scene, at which point I'd have been leaving  
 21 and going ground--assigned myself, and also if Craig  
 22 didn't get in for whatever reason, I'd have to resume as  
 23 TFC even though there'd been a delay in that.  
 24 Q. How long would Craig Thompson have to have been delayed  
 25 before you were --

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1 A. I was just about to ring him when he actually arrived.  
 2 Q. As we'll come to, that was at about 10 to midnight?  
 3 A. Yes.  
 4 Q. Approximately 30 minutes after you'd arrived in Silver?  
 5 A. Yes, correct.  
 6 Q. Before we come to what you did, I would like to just ask  
 7 you about some of the people you may or may not have  
 8 interacted with. Did you see a woman by the name of  
 9 Annemarie Rooney?  
 10 A. I did, yes.  
 11 Q. Was she in the Silver room?  
 12 A. She was.  
 13 Q. Was she there before you arrived or did she arrive after  
 14 you?  
 15 A. I think she was there before. I'm pretty sure her  
 16 computer screen was already switched on.  
 17 Q. Did you speak to her?  
 18 A. Just to introduce myself.  
 19 Q. What did you understand her role to be within the Silver  
 20 room that night?  
 21 A. As the NWSA ILO.  
 22 Q. ILO?  
 23 A. Yes. The inter-agency liaison officer.  
 24 Q. Yes. Did you understand her to be a Silver commander or  
 25 is that a different thing in your understanding to

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1 an ILO or does it not matter?  
 2 A. I don't know. I didn't establish — I knew she was from  
 3 NWSA, she was sat in the NWSA place that was normally  
 4 occupied by the NILO or ILO. I may have made an  
 5 assumption that's what she was.  
 6 Q. Were you present at any point when ACC Ford spoke to  
 7 Ms Rooney?  
 8 A. I would have been in the room but I wasn't aware of  
 9 a conversation.  
 10 Q. Did you hear any conversation between Ms Ford or  
 11 Ms Rooney about whether or not this was an active  
 12 shooter incident?  
 13 A. No, I didn't. I didn't hear that.  
 14 Q. Did you see in the Silver room Superintendent Nawaz?  
 15 A. Not at that time.  
 16 Q. When was the first time that evening that you saw  
 17 Superintendent Nawaz approximately?  
 18 A. Um...  
 19 Q. Can I give you some times?  
 20 A. Yes.  
 21 Q. Was it before or after you saw Superintendent Thompson?  
 22 A. After.  
 23 Q. Was it before or after you saw Superintendent Hill? We  
 24 know he arrived just before midnight.  
 25 A. I don't know.

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1 Q. Did you speak to Superintendent Nawaz at the point of  
 2 the evening that you saw him?  
 3 A. No, I didn't.  
 4 Q. You knew, you told us, who the Night Silver was?  
 5 A. Yes, that's right.  
 6 Q. When you arrived at the Silver room, did you regard it  
 7 as being part of your responsibilities when there to  
 8 find and speak to the Silver commander?  
 9 A. No, I didn't, because I was focused primarily on the  
 10 firearms side, despite not taking over the role.  
 11 I didn't know whether he was working from another  
 12 location.  
 13 Q. We'll come back to what you were doing and just park,  
 14 if we may, the firearms role. Did you speak to  
 15 Ian Randall at any point?  
 16 A. In Silver control?  
 17 Q. Yes.  
 18 A. I certainly became aware that he was there — he's got  
 19 quite a distinctive voice — but I didn't speak to him  
 20 directly, no.  
 21 Q. Did you understand his role was as the Silver room  
 22 manager?  
 23 A. I did.  
 24 Q. Superintendent Chris Hill. Did you see him at any point  
 25 that night?

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1 A. I did. After I'd been speaking to Mr Thompson, I turned  
 2 round and Chris Hill was there.  
 3 Q. Did you speak to him?  
 4 A. Not at that point, but I did later.  
 5 Q. We'll leave that for the time being.  
 6 We're just going to have a look at some calls you  
 7 made whilst you were in Silver and then talk about the  
 8 other duties undertaking while you were in there.  
 9 If we go back to your call schedule there is  
 10 a record at line 5686 of a 36-second contact between  
 11 devices at 23.18 hours, your device and Leor Giladi's  
 12 device being indicated.  
 13 A. Yes, that's correct.  
 14 Q. Do you have a recollection of speaking to  
 15 Superintendent Giladi that night?  
 16 A. I have no detail other than I think he asked me if I was  
 17 okay.  
 18 Q. So you think it was a welfare —  
 19 A. It was more about should he come in and I will have said  
 20 to him that Craig was coming in to take it.  
 21 Q. Next we're going to have a look at contact you had with  
 22 Superintendent Dexter. We have a record of the  
 23 telephone call, which we can see lasted 1 minute and  
 24 19 seconds; obviously that's just from the call billing.  
 25 We also have one half of that conversation recorded on

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1 Chief Inspector Dexter's dictaphone.  
 2 A. Yes.  
 3 Q. Have you had a chance to refresh your recollection --  
 4 A. I have.  
 5 Q. -- from that conversation? In summary did he begin by  
 6 telling you what approach he was taking at the scene?  
 7 A. Yes.  
 8 Q. The time marking for this is about 11.30, isn't it?  
 9 A. That's correct, yes.  
 10 Q. 23.30. It's not captured in the dictaphone but  
 11 obviously it doesn't have your side of the conversation.  
 12 At any point in that conversation that you recall did  
 13 you discuss Operation Plato?  
 14 A. I think it was taken as read. It'd been on the radio  
 15 channel quite a bit.  
 16 Q. So taken as read. Did you discuss zoning?  
 17 A. Um... Would it be possible to have another look at it?  
 18 Q. Yes. Is it not in front of you?  
 19 A. No.  
 20 Q. I do beg your pardon. I'm so sorry, I had assumed that  
 21 it was. Perhaps while that's being... This is not  
 22 a document we can put up on the screen because some of  
 23 the things in it are quite distressing.  
 24 (Pause)  
 25 Let's go through it together because other people

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1 don't have it and we'll remember this is just one side  
 2 of the conversation so far as we can tell. It begins:  
 3 "Hi Rach."  
 4 And then it goes on and I will just read out:  
 5 "All right. Well, we have cleared the concourse and  
 6 got a containment on that. What I'm not happy with  
 7 is that we have not cleared the rest of the building and  
 8 we have got a one outstanding. So whilst I've deployed  
 9 Merseyside to Piccadilly and I'm going to put an armed  
 10 cordon on there, but we need to coordinate an evacuation  
 11 of Piccadilly potentially unless we go with containing  
 12 it and hold it while we find out."  
 13 He goes on to indicate:  
 14 "We'll contain. I've done that from via the FDO.  
 15 He's already tasked Merseyside."  
 16 Then it goes:  
 17 "Right, okay. Right, thanks a lot -- okay bye."  
 18 A. Yes.  
 19 Q. Having had a chance to refresh your memory from that, do  
 20 you recall any discussion about zoning?  
 21 A. There's nothing on here. I think I understood what  
 22 he was talking about, was the zones, but it's clearly  
 23 not referenced.  
 24 Q. So we can agree that certainly on Mr Dexter's side there  
 25 is no express mention of the word "zone"?

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1 A. No.  
 2 Q. Is there anything from what he is saying to you that  
 3 would make clear to you in the Silver control room where  
 4 the zones are at Manchester Victoria railway station?  
 5 A. No.  
 6 Q. In your understanding on 22 May 2017, was it important  
 7 for it to be clearly understood where the zones were?  
 8 A. Yes.  
 9 Q. In terms of a review of those zones, was that something  
 10 that ought to take place as well as part of  
 11 Operation Plato so far as you were concerned?  
 12 A. Yes.  
 13 Q. You're here in Silver control, the Silver room at that  
 14 time, speaking to the ground--assigned tactical firearms  
 15 commander. I understand that you didn't view yourself  
 16 as having played the away--from--scene tactical firearms  
 17 commander, but might it have formed a relevant part of  
 18 your conversation to speak to him about where the zones  
 19 were?  
 20 A. I wasn't aware of how far he'd got in relation to  
 21 identifying the zones. Whether I should have asked him  
 22 about it, that's -- yes, I probably should.  
 23 Q. We'll come to it in due course, but --  
 24 MR COOPER: Sorry to interrupt, I'm desperately trying to  
 25 keep up with Opus with this document. We obviously

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1 haven't got the hard copy. I wonder if my learned  
 2 friend could tell me where he's referring to so I can  
 3 catch up.  
 4 MR DE LA POER: I am so sorry, Mr Cooper. Thank you for  
 5 drawing that to my attention. We are looking at page 2  
 6 of the schedule. We are looking at the top row, 6869  
 7 (sic), which is timed at 23.30.19.  
 8 SIR JOHN SAUNDERS: If not 6889.  
 9 MR DE LA POER: Yes, that'll be my eyesight.  
 10 MR COOPER: I'm grateful. It's difficult to keep up on the  
 11 screen.  
 12 (Pause)  
 13 MR DE LA POER: Just trying to understand this issue of  
 14 zoning, we are now an hour into the incident, and  
 15 I appreciate that you will know that Chief  
 16 Inspector Dexter hadn't been on scene for very long  
 17 at the point of this conversation.  
 18 A. Yes.  
 19 Q. But in your experience, understanding and training so  
 20 far as Operation Plato, by 23.30, so 1 hour after the  
 21 explosion, in the event that it was an Operation Plato  
 22 situation, should there have been zones?  
 23 A. It certainly sounds like there should have been zones,  
 24 yes.  
 25 Q. And if there were zones, who needs to know what the

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1 zones are?  
 2 A. The police, ambulance and fire commanders.  
 3 Q. What about the police firearms officers? Do they need  
 4 to know where the zones are?  
 5 A. It's a ... An hour in, yes, I think they probably should  
 6 have known. I don't know -- yes, an hour in I think  
 7 they probably should have known.  
 8 SIR JOHN SAUNDERS: They need to have the area they've got  
 9 to clear and make sure there's no one in there?  
 10 A. They do, but they are less restricted by the zones than  
 11 anyone else.  
 12 SIR JOHN SAUNDERS: I do understand that, but their function  
 13 is, "Get into that zone, make sure there are no gunmen  
 14 in there" --  
 15 A. Yes.  
 16 SIR JOHN SAUNDERS: -- "and then tell us so we know whether  
 17 to get rescuers in".  
 18 A. Yes.  
 19 MR DE LA POER: Also, whilst they may not be prohibited from  
 20 going in there, is it not important information for  
 21 firearms officers to have immediately in their minds,  
 22 whether they are in an area which has been designated  
 23 active terrorist threat, an area which is a potential  
 24 area where terrorists might return, or an area which has  
 25 been declared a cold zone?

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1 A. Yes, you would expect that.  
 2 Q. We're going to look at in due course the firearms  
 3 channel, but it may be established by the evidence that  
 4 by this point in the evening the word "zone", the word  
 5 "hot", the word "warm" and the word "cold" had not been  
 6 mentioned on the national firearms channel at any point  
 7 up to 23.30. If that is the state of the evidence,  
 8 you're now in Silver, would that have been a relevant  
 9 question for you to ask?  
 10 A. It would; I didn't ask it.  
 11 Q. Can you think of any reason why you didn't at the time?  
 12 A. No.  
 13 Q. One explanation, and I'm certainly not suggesting that  
 14 this is the explanation, and I don't want to be  
 15 understood to be doing so, but one explanation was that  
 16 if the zones were not being mentioned was because nobody  
 17 had it in mind that that was something that needed to  
 18 happen.  
 19 A. It's certainly possible.  
 20 SIR JOHN SAUNDERS: Did you say it's possible?  
 21 A. Yes.  
 22 MR DE LA POER: Was that your state of mind? Might that be  
 23 an explanation as to why you didn't ask, "What are the  
 24 zones"?  
 25 A. It's certainly -- yes. I don't know, but it can't have

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1 been at the forefront of my mind certainly.  
 2 Q. Next we're going to look at 7312 --  
 3 SIR JOHN SAUNDERS: Sorry, this is an obvious question and  
 4 it may be that it's all going to be come to, but the  
 5 reality, if you're not thinking of zoning -- and this is  
 6 not meant to be getting at you -- just generally looking  
 7 at things, if you're not thinking of zoning, you're not  
 8 thinking of casualties, are you? Because that's what  
 9 zoning is all to do about, it's casualties, getting them  
 10 out. Is that being unfair?  
 11 A. I think it's a little unfair, sir.  
 12 SIR JOHN SAUNDERS: Okay. I just haven't noticed any  
 13 mention so far going through these of casualties and  
 14 actually what are we doing about getting the casualties  
 15 out.  
 16 A. I was aware the casualties were being taken out, but  
 17 that is it, I'm sorry.  
 18 SIR JOHN SAUNDERS: No, no, it's all right.  
 19 MR DE LA POER: Was it your role, as you saw it, at any  
 20 point in the night to be identifying what is going on  
 21 with the casualties and how is that working?  
 22 A. I could read that on the FWIN.  
 23 Q. You could see that on the FWIN?  
 24 A. I could see that on the FWIN, yes.  
 25 Q. Based upon your training as a tactical firearms

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1 commander, did you know what an emergency search tactic  
 2 was?  
 3 A. Yes, I did.  
 4 Q. If you don't zone an area, what other differences might  
 5 there be between an Operation Plato situation and an  
 6 emergency search?  
 7 A. I would expect an emergency search would be taking place  
 8 into a hot zone. It might have covered a warm zone at  
 9 the same point, but that would have been done very  
 10 quickly, particularly if you're bringing in other  
 11 resources from other agencies. That's probably the  
 12 extent of my knowledge.  
 13 Q. You see, we know that early on Inspector Sexton, as  
 14 he was, authorised an emergency search tactic.  
 15 A. Yes.  
 16 Q. He then declared Operation Plato and the evidence will  
 17 establish in due course what was and wasn't said about  
 18 zones, but if we work on the hypothesis that zones were  
 19 not expressly mentioned over the radio, we know that  
 20 they weren't conveyed to partner agencies, what I am  
 21 trying to get to the bottom of is what will then be the  
 22 difference between an emergency search and an  
 23 Operation Plato without zones?  
 24 A. I'm not sure they are directly in correlation with them.  
 25 The emergency search was obviously to look for somebody

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1 else that was a threat and to neutralise that threat if  
 2 necessary.  
 3 Q. All right. Perhaps we can -- I'll take that up with  
 4 Mr Lawton in due course and see where we get to.  
 5 Thank you very much.  
 6 Can we go back to the schedule where we can see at  
 7 row 7312 that at 23.35 there is a contact indicated  
 8 between you and the casualty bureau.  
 9 A. That's correct.  
 10 Q. And you indicated in your witness statement that you  
 11 spoke to the casualty bureau?  
 12 A. I spoke to Helen Palfrey, yes.  
 13 Q. Helen Palfrey who was involved in setting up the  
 14 casualty bureau; is that right?  
 15 A. That's correct. She is, or was, the casualty bureau  
 16 lead for the force.  
 17 Q. Why were you speaking to somebody who was setting up the  
 18 casualty bureau given that you had earlier in the  
 19 evening been the cadre TFC?  
 20 A. I wasn't fully occupied as a TFC because I hadn't taken  
 21 the role and Debbie Ford -- I believe it was  
 22 Debbie Ford -- asked me to activate the casualty bureau.  
 23 SIR JOHN SAUNDERS: Is this after the request to the FDO to  
 24 activate?  
 25 MR DE LA POER: Standing here now, sir, I'd be guessing, I'm

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1 afraid (overspeaking).  
 2 SIR JOHN SAUNDERS: We just seem to have heard --  
 3 Superintendent Hill also authorised the setting up of  
 4 the casualty bureau at some stage and I'm afraid I can't  
 5 remember off the top of my head when it was but it still  
 6 needed to go through the FDO. Was that still the  
 7 position with you?  
 8 A. I rang Helen direct knowing that she's the casualty  
 9 bureau lead because I was a casualty bureau room manager  
 10 as well, so I knew she was a key individual who needed  
 11 to know about it. I didn't know if it had been  
 12 activated by or via the FDO because it's actually the  
 13 FDO who actually presses the button to send out the text  
 14 message to get all the staff in.  
 15 SIR JOHN SAUNDERS: And that has to happen whoever else is  
 16 authorising it?  
 17 A. I presume so.  
 18 SIR JOHN SAUNDERS: I think he was saying, "I just don't  
 19 have a moment to do anything like that".  
 20 A. I agree.  
 21 SIR JOHN SAUNDERS: Right, okay, thank you.  
 22 MR DE LA POER: At all events you had experience of the  
 23 casualty bureau?  
 24 A. I did.  
 25 Q. And you have told us that ACC Ford instructed you to

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1 contact the casualty bureau?  
 2 A. Yes.  
 3 Q. I think from what you have told us, so far as you  
 4 weren't preoccupied at that moment with a firearms role,  
 5 that that's why you had capacity to do what would  
 6 otherwise not be a firearms-related activity?  
 7 A. Absolutely not. Yes, that's correct.  
 8 SIR JOHN SAUNDERS: How was it left at the end of your  
 9 conversation?  
 10 A. With Helen Palfrey?  
 11 SIR JOHN SAUNDERS: Yes.  
 12 A. That she'd get the ball rolling, get it activated. It  
 13 takes time, not least to get the staff in, particularly  
 14 at that night, either diverting them from existing roles  
 15 or from home.  
 16 SIR JOHN SAUNDERS: So that could happen without the FDO  
 17 pushing the button?  
 18 A. It's the FDO that does push the button.  
 19 SIR JOHN SAUNDERS: So it still required the FDO to push the  
 20 button?  
 21 A. Yes -- or it did, I don't know whether that's changed.  
 22 MR DE LA POER: The next entry gets a little bit confused in  
 23 the schedule, so I hope I have found a way to extract it  
 24 out. It's a telephone call you have with  
 25 Inspector Sexton. It's timed at around 23.41 or so but

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1 we'll -- what we'll do, bearing in mind there were  
 2 a number of attempts, as we can see, for you to try and  
 3 speak to him and he kept becoming drawn away from your  
 4 conversation. I think that is a fair summary, isn't it?  
 5 A. That's correct.  
 6 Q. Let's just have a look at where you actually get to  
 7 speak to each other. We're going to play the audio now,  
 8 so I just give this warning. We're going to hear some  
 9 audio from the night. It's a conversation between you  
 10 and Inspector Sexton, neither of you are at the scene  
 11 but clearly we are dealing with a situation where you  
 12 are both operating in the pressure of the situation that  
 13 you were facing.  
 14 A. That's correct.  
 15 Q. We're also, as we have before, going to bring the  
 16 transcript up and I hope Mr Lopez is going to be able to  
 17 help us track that. I'll pause for a couple more  
 18 moments in case anyone wants to step away. This will  
 19 take approximately 2.5 minutes.  
 20 {INQ018857A/1} and {INQ018857T/2} from counter time  
 21 19:26.  
 22 (Pause)  
 23 Sir, it may be that as we've been going an hour and  
 24 a quarter, we should have a break.  
 25 (2.47 pm)

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1 (A short break)  
 2 (2.59 pm)  
 3 MR DE LA POER: Sir, I'm very grateful to Mr Lopez for the  
 4 time and care he's given this, and the other members of  
 5 the technical support team. I think we're now in  
 6 a position to play.  
 7 SIR JOHN SAUNDERS: Thank you.  
 8 (Audio recording played to the inquiry)  
 9 MR DE LA POER: Thank you. Hopefully, Ms Buckle, that  
 10 refreshes your memory as to that call. At no point  
 11 in the course of it did you inform Inspector Sexton what  
 12 the plan was in relation to Superintendent Thompson?  
 13 A. No, I didn't.  
 14 Q. Listening to it now, do you agree it's plain that the  
 15 thrust of what he's saying to you is that he needs to be  
 16 relieved as soon as possible?  
 17 A. Yes, absolutely.  
 18 Q. Why is it, do you think, you didn't tell him that it  
 19 wouldn't be you taking over but it would be  
 20 Superintendent Thompson?  
 21 A. It's something I reflected on pretty much as soon as  
 22 we'd finished the phone call. It was because I didn't  
 23 have 100% certainty that Craig — I knew he was coming,  
 24 but I didn't have 100% certainty he was going to arrive,  
 25 as in something could happen on his journey. There was

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1 no reason not to tell him.  
 2 Q. At that stage, one of the questions you asked him was,  
 3 "How are things in FDO world?"  
 4 A. Yes.  
 5 Q. Was it your understanding at the time that the person  
 6 who supported the FDO was the FDS?  
 7 A. Yes, that's correct.  
 8 Q. Was it also your understanding at the time that the  
 9 person who was the FDS at the start of the incident and  
 10 who had supported the FDO, Inspector Sexton, until about  
 11 23.15/23.20 had been Ian Randall?  
 12 A. Yes. I didn't know what time he'd left  
 13 Inspector Sexton.  
 14 Q. But it's apparent, isn't it, from the transcript that  
 15 you knew that Ian Randall was no longer supporting the  
 16 FDO because he was with you?  
 17 A. Yes, I could hear his voice.  
 18 Q. So the FDO at that stage in the evening was calling you  
 19 as the cadre TFC. He told you that he was without the  
 20 FDS that he had started the incident with. That's the  
 21 thrust of what he was communicating, do you agree?  
 22 A. Yes.  
 23 Q. I appreciate that Superintendent Thompson is to arrive  
 24 8 minutes, as we now know, from then.  
 25 A. Yes.

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1 Q. But bearing in mind that there was uncertainty, as  
 2 you have told us in your mind, about whether he would  
 3 arrive and, if so, exactly when, following that call,  
 4 should you have spoken to ACC Ford?  
 5 A. Um...  
 6 Q. I'll tell you what I suggest the purpose of doing that  
 7 might be. It's to communicate to her the position that  
 8 the FDO is in at that moment as he has conveyed it to  
 9 you.  
 10 A. I think she would have understood that the FDO was busy,  
 11 very busy. I felt quite bad that I wasn't taking over,  
 12 I hadn't already taken over, actually, at that point,  
 13 although it would have taken me 20 minutes to bring  
 14 things up to speed. I just considered just taking over  
 15 regardless, even though I'd had that conversation with  
 16 Craig Thompson.  
 17 Q. You had immediately access, didn't you, to the very  
 18 person who could have appointed you to that role in the  
 19 interim?  
 20 A. I had, yes.  
 21 Q. And by this stage, I think from what you have told us,  
 22 that it'd take you 20 minutes to get into a position to  
 23 take over, at the point of this call you would otherwise  
 24 have been in a position to take over as —  
 25 A. Pretty much, yes.

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1 Q. — TFC?  
 2 A. Yes.  
 3 Q. There was uncertainty in your mind about the arrival of  
 4 Mr Thompson?  
 5 A. I reasonably expected him to arrive but I didn't have a  
 6 100% guarantee.  
 7 Q. And even after he arrived there would be a period of  
 8 time where he would have to get on top of things in  
 9 order to be able to take over?  
 10 A. Yes.  
 11 Q. You mentioned in your statement, and I think you've  
 12 already referred to it today, what a double handover is.  
 13 A. Yes.  
 14 Q. Is that a relevant consideration to the position that  
 15 you were in?  
 16 A. Yes, it was.  
 17 Q. And do you want to just explain to us why?  
 18 A. As a firearms commander, your documentation of  
 19 everything is really, really important. When you try  
 20 and deliver a handover to somebody else, your  
 21 interpretation of what's happening can vary from their  
 22 understanding of what's happening or has happened. And  
 23 by putting two handovers in in rapid succession, you run  
 24 the risk of information being misinterpreted very  
 25 easily. Even though it's documented it can still be

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1 misunderstood and it takes time to actually do that  
 2 handover process as well.  
 3 Q. So that is a disadvantage of you taking over --  
 4 A. Yes.  
 5 Q. -- expecting Superintendent Thompson? On the other side  
 6 is there a potential disadvantage that we will have an  
 7 initial tactical firearms commander who is running an  
 8 incident for a very long time?  
 9 A. Yes, indeed.  
 10 Q. And as we know, here, running that incident without the  
 11 FDS that he started the job with?  
 12 A. Certainly the one he started the job with. I assumed he  
 13 got some other support. I didn't realise how limited  
 14 that support was.  
 15 Q. Well, he told you that he had ended up having to put  
 16 a call-taker, as he described it, to answer his  
 17 telephone.  
 18 A. Yes. But I didn't -- I'd never done the role, I didn't  
 19 know exactly what support was round him or whether he  
 20 had got anything else. I know he said he'd got a  
 21 call-taker, but I still didn't -- I don't think  
 22 I comprehended just how little support he'd got at that  
 23 point.  
 24 SIR JOHN SAUNDERS: In reality when Superintendent Thompson  
 25 did come, did you in fact brief him?

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1 A. I did, yes.  
 2 SIR JOHN SAUNDERS: How does that differ from a formal  
 3 handover from you to him?  
 4 A. It's not documented, I don't know what he wrote down,  
 5 but I'm giving him a flavour of what's happened rather  
 6 than --  
 7 SIR JOHN SAUNDERS: Okay. Does it have to be written down  
 8 or can it be recorded?  
 9 A. Ideally it should all be written down -- recorded for  
 10 posterity, basically, but also if there's a --  
 11 SIR JOHN SAUNDERS: You can do that on oral things as we're  
 12 hearing during this.  
 13 A. Absolutely. I didn't have that facility with me.  
 14 SIR JOHN SAUNDERS: There was nothing in Silver control  
 15 which could have recorded your handover?  
 16 A. I'm not aware of it and I've been in Silver control an  
 17 awful lot.  
 18 SIR JOHN SAUNDERS: Okay. So when you were giving him  
 19 a briefing, could he write things done?  
 20 A. He wrote notes down, yes -- I believe he did.  
 21 SIR JOHN SAUNDERS: Again, explain to me the difference  
 22 between that sort of handover and a formal handover.  
 23 A. Um... I don't know. There doesn't seem to be that much  
 24 difference. Obviously --  
 25 SIR JOHN SAUNDERS: If there is, you just need to explain it

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1 to me.  
 2 A. Yes, no, I appreciate that.  
 3 SIR JOHN SAUNDERS: Because it's part of your reasoning,  
 4 isn't it, as to why you didn't do it?  
 5 A. It is. I think part of it is also leading to confusion  
 6 over the Airwaves as to who is the TFC now because if  
 7 you get a change and another change very rapidly and you  
 8 run the risk of someone missing a transmission not  
 9 knowing who it is.  
 10 SIR JOHN SAUNDERS: One difference may be that if you're  
 11 going to take a handover, you'd have to take it from the  
 12 FDO, so you'd have to take that handover and you'd have  
 13 to note it down.  
 14 A. Yes.  
 15 SIR JOHN SAUNDERS: How many notes would you anticipate  
 16 writing down?  
 17 A. Quite a lot.  
 18 SIR JOHN SAUNDERS: What does "quite a lot" mean?  
 19 A. It depends. You would probably make handwritten notes  
 20 and then transcribe them into an electronic --  
 21 SIR JOHN SAUNDERS: Yes, later on.  
 22 A. No, no.  
 23 SIR JOHN SAUNDERS: On the night?  
 24 A. On the night, yes.  
 25 SIR JOHN SAUNDERS: Why?

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1 A. Because when you then hand over to somebody else, they  
 2 need to be able to access what's happened already.  
 3 SIR JOHN SAUNDERS: You can't give them the bit of paper?  
 4 Couldn't read your writing.  
 5 A. Probably not. Mine's not too bad, but some of my  
 6 colleagues ...  
 7 SIR JOHN SAUNDERS: This sounds to me a bit like -- and tell  
 8 me if I'm wrong -- a bit like process taking over from  
 9 what is actually the most pragmatic way of dealing with  
 10 something.  
 11 A. There certainly is process involved. The TFC log is or  
 12 was a very enormous(?) document to complete, I always  
 13 found.  
 14 MR DE LA POER: You've told us that at 22.42 it formed part  
 15 of your thinking as to what you would and wouldn't say  
 16 to Inspector Sexton, the uncertainty around  
 17 Superintendent Thompson.  
 18 A. Yes.  
 19 Q. So would it be fair to say that on any view, there was  
 20 likely to be a period of at least 20 minutes from that  
 21 call before he would be in a position to take over in a  
 22 best case scenario?  
 23 A. Yes, I agree with you.  
 24 Q. Is that an insufficient period of time for it to be  
 25 worthwhile to have that initial transfer to take away

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1 from the force duty officer and give it to somebody in  
2 your position?  
3 A. At the time I thought it was too short a time. With  
4 hindsight and knowing how busy he was, it could have  
5 been done.  
6 SIR JOHN SAUNDERS: Sorry if this sounds like a bit of  
7 a double act and I am sorry that questions are coming at  
8 you from all directions.  
9 Had Superintendent Thompson said to you, "I will  
10 take over that, you are not to take it over in the  
11 meantime, wait for me to come" --  
12 A. That was my understanding.  
13 SIR JOHN SAUNDERS: -- "leave it with the FDO"?  
14 A. Yes, that was my understanding.  
15 SIR JOHN SAUNDERS: Okay, thank you.  
16 MR DE LA POER: It was about 8 minutes after that call,  
17 7 minutes or so, that Superintendent Thompson arrived?  
18 A. Yes.  
19 Q. And I think that it took a further period of about 25 to  
20 30 minutes before he formally took over from the initial  
21 tactical firearms commander; is that your understanding?  
22 A. I believe so, yes.  
23 Q. So although you weren't to know the precise timings  
24 then, there was a further period from that telephone  
25 call when you tell us you were in a position to take

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1 over command of over 30 minutes during which tactical  
2 firearms command remained with the FDO?  
3 A. Yes, that's correct.  
4 Q. And having thought about it, was that an acceptable  
5 period of time for that command to be resting with him?  
6 A. In view of the fact he'd had such a long duration  
7 already, it probably wasn't. But that was the  
8 circumstances at the time.  
9 SIR JOHN SAUNDERS: There's a difference between us saying,  
10 "Looking back now, that is just not acceptable", bearing  
11 in mind the situation we know he was in --  
12 A. Yes.  
13 SIR JOHN SAUNDERS: -- and I think we'll probably all agree  
14 it wasn't acceptable.  
15 Whether you at the time realised it was  
16 unacceptable --  
17 A. I knew he'd be under pressure and I could hear from the  
18 radio he was under pressure. I felt for him but I had  
19 that conversation and --  
20 SIR JOHN SAUNDERS: He was a real gentleman saying, "Take as  
21 long as you like", really?  
22 A. He was an absolute gentleman, yes.  
23 MR DE LA POER: When you spoke to Superintendent Thompson,  
24 did any part of your discussion include mention of  
25 Operation Plato?

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1 A. I think ... I don't know.  
2 Q. Do you have a recollection of whether or not you  
3 discussed zoning?  
4 A. No, I don't. I have no recollection.  
5 Q. Bearing in mind that you were playing your part to  
6 improve his situational awareness --  
7 A. Yes.  
8 Q. -- bearing in mind your role to that point, was zoning  
9 a relevant topic for you to discuss with him at the  
10 point that you spoke to him?  
11 A. Potentially, yes.  
12 Q. Why wouldn't it have been?  
13 A. I don't think I was aware of where the zones were or  
14 where the limits of the zones were at that point, not in  
15 any detail.  
16 Q. Let's take that snapshot in time so far as we can  
17 recreate it in that period from the time you spoke to  
18 Chief Inspector Dexter at half past and the time you  
19 spoke to Superintendent Thompson shortly after he  
20 arrived at 10 to. Where did you understand the zones  
21 were?  
22 A. The only real reference I'd heard was to the warm zone.  
23 Q. The warm zone?  
24 A. Yes.  
25 Q. And where had you heard reference to the warm zone?

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1 A. By the radio.  
2 Q. So before you spoke to Superintendent Thompson, you  
3 think that you had heard reference to the warm zone?  
4 A. I think so, yes.  
5 Q. And where did you understand the warm zone to be?  
6 A. The City Rooms and the concourse area. I don't know the  
7 geography of the building that well, but I understood it  
8 to be where the attacker had...  
9 Q. Did you have access to a plan at that --  
10 A. I did not.  
11 Q. So in Silver control there was no layout plan of the  
12 station for you to refer to?  
13 A. There may have been access but I didn't have access  
14 personally.  
15 Q. Would that have been a relevant document for you to  
16 find --  
17 A. Yes.  
18 Q. -- so that when Superintendent Thompson came in you  
19 could say to him, "This is the layout, this is where  
20 I think the zones are"?  
21 A. Yes, it would have been useful.  
22 Q. Do tell me if I'm being unfair about this but within  
23 Operation Plato is that sort of understanding not  
24 absolutely critical?  
25 A. With hindsight, I can see that my knowledge of Plato was

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1 not as strong as it possibly should have been.  
 2 Q. Before we conclude my questions, there are just two more  
 3 topics to cover and they're both short. You have  
 4 mentioned your knowledge of Operation Plato. In fact,  
 5 is it fair to say that in the course of your witness  
 6 statements of your account of the night that you don't  
 7 actually mention Operation Plato once?  
 8 A. That's correct, yes.  
 9 Q. So in your whole account that you gave -- and we should  
 10 identify the date so that everybody understands it. It  
 11 was on 4 December 2019 when you sat down to give your  
 12 account of events. You didn't refer to Operation Plato  
 13 once?  
 14 A. It's not in the statement.  
 15 Q. Not in the statement. And again why do you -- given  
 16 that you knew that Operation Plato had been declared on  
 17 the night, why do you think your account makes no  
 18 mention of it?  
 19 A. I don't know. I don't know. My -- I just don't know.  
 20 Q. You tell me whether this might be right or whether  
 21 it isn't right at all: might that be because it wasn't  
 22 really until this inquiry started you have come to  
 23 understand the importance of Operation Plato or did you  
 24 have that understanding when you gave your statement?  
 25 A. I certainly had awareness of Operation Plato zoning and

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1 the ground--assigned TFC and how the communications  
 2 between the partner agencies should be taking place.  
 3 However, I hadn't used that in an operational sense  
 4 previously to this.  
 5 Q. There is a mention of Operation Plato within your  
 6 handwritten notes. Have you had an opportunity to  
 7 refresh your recollection --  
 8 A. I have, yes.  
 9 Q. -- from those?  
 10 What I'm going to do is ask Mr Lopez to bring up  
 11 that reference: {INQ029035/5}.  
 12 We can see there on that page, this is just how it's  
 13 been reproduced to us from your daybook, that there is  
 14 indicated there, "22.47, Op Plato".  
 15 If we go to the preceding page {INQ029035/4}, and  
 16 here I just want to note briefly the timestamp -- sorry,  
 17 that's the subsequent page, the one before that entry.  
 18 We can see that there is an entry at 01.45 in  
 19 a continuous log. We then go to {INQ029035/5} where  
 20 we were. And then we go to {INQ029035/6} and we can see  
 21 the narrative continues at 01.46.  
 22 SIR JOHN SAUNDERS: These are contemporaneous notes?  
 23 A. They are, sir.  
 24 SIR JOHN SAUNDERS: Thank you.  
 25 MR DE LA POER: To the best of your knowledge, recalling

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1 what your practice was, how was it that that note  
 2 "Operation Plato 22.47" came to be made?  
 3 A. I was asked by ACC Ford or a representative of her to  
 4 contact the force duty officer and establish what time  
 5 he'd called Operation Plato.  
 6 Q. So you were making your running log, we see you get to  
 7 01.43, you're then asked, is this right, by ACC Ford to  
 8 find out that time and then you resume your running log?  
 9 A. No. My working practice was just to write on one page  
 10 and so when the pages were both open I would only write  
 11 on one side and so when I was asked, the note just went  
 12 into the empty page, which is why it --  
 13 Q. (Overspeaking).  
 14 A. -- looks a little bit bizarre.  
 15 Q. I understand. So that note there is you running down  
 16 that time?  
 17 A. Just establishing that time it was called, yes.  
 18 Q. And did that involve you having to phone the FDO?  
 19 A. Yes, it did.  
 20 Q. Were you not able to look at the FWIN and see that it  
 21 was marked on the FWIN that it was declared at 22.48?  
 22 A. I don't know if you've had the opportunity to read FWINs  
 23 when they're on the old GMP operations system, which was  
 24 GMPICS, it is very difficult to identify individual  
 25 locations for comments.

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1 Q. But do you agree that that is the only note within your  
 2 daybook --  
 3 A. I do.  
 4 Q. -- that refers to Operation Plato?  
 5 A. Yes, that's right.  
 6 Q. So is it a fair inference from the notes that you were  
 7 keeping at the time that of all the things that were  
 8 being said and discussed, Operation Plato was not at the  
 9 top of your thinking as you were tracking through the  
 10 incident? Is that fair or unfair?  
 11 A. It's unfair.  
 12 Q. It's unfair?  
 13 A. Yes.  
 14 Q. Please explain why.  
 15 A. It was definitely in my mind about Plato from having  
 16 heard it from the first time in the car.  
 17 SIR JOHN SAUNDERS: Can we just have a page back?  
 18 MR DE LA POER: The Op Plato page, sir? {INQ029035/5}.  
 19 A. All I've done is to ring the force duty officer and  
 20 say --  
 21 SIR JOHN SAUNDERS: I understand, I'm just trying to get a  
 22 timing for this. You were on page 6 writing your notes  
 23 were you at the time?  
 24 A. Yes, I probably would have been on page 6.  
 25 SIR JOHN SAUNDERS: So it's some time within the time of the

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1 entries on page 6?  
 2 A. It's likely to be, yes.  
 3 MR DE LA POER: So after 01.46, which is where we see --  
 4 A. I'd have to see it again.  
 5 Q. If we go to page 6, Mr Lopez, 01.46 is the first entry  
 6 there, so it's some time after that entry?  
 7 A. Yes.  
 8 Q. Right, thank you very much?  
 9 SIR JOHN SAUNDERS: Thank you.  
 10 MR DE LA POER: The final topic to ask you about, Ms Buckle,  
 11 please, is Greater Manchester Fire and Rescue Service.  
 12 In your witness statement -- we can look at it if you  
 13 need to but I am sure you'll take it from me -- you make  
 14 a comment about how fire are usually the first to  
 15 arrive. Do you remember making that remark.  
 16 A. I do.  
 17 Q. That was a reference to the first to arrive in the  
 18 Silver control room; is that right?  
 19 A. That's correct, yes.  
 20 Q. So before 22 May 2017 it was your experience that the  
 21 first or one of the first people who would be in the  
 22 Silver control room would be a representative of  
 23 Greater Manchester Fire and Rescue Service?  
 24 A. That's correct, yes.  
 25 Q. So when you turned up at 23.18 did it strike you around

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1 that time that there was no representative from  
 2 Greater Manchester Fire and Rescue Service?  
 3 A. Yes, it did.  
 4 Q. What if anything did you do when that struck you?  
 5 A. I didn't specifically do anything rather than just note  
 6 it in my head, that they're not here yet and I thought  
 7 it was a "yet".  
 8 Q. Did you take any steps to draw that to anyone's  
 9 attention that you had noticed that?  
 10 A. No, I didn't.  
 11 Q. Or ask whether or not anybody had an estimated time of  
 12 arrival for them?  
 13 A. Not at that point, no.  
 14 Q. Was it your understanding on 22 May 2017 that the Fire  
 15 and Rescue Service might have a part to play in the  
 16 emergency response?  
 17 A. Yes. Yes, sir.  
 18 Q. Did there come a point when you were tasked by ACC Ford  
 19 to find out where the Fire and Rescue Service were?  
 20 A. Yes, that's correct.  
 21 Q. And did you make a telephone call?  
 22 A. I did, sir.  
 23 Q. And did you end up speaking to somebody?  
 24 A. I did, yes.  
 25 Q. Was that person a representative of the Fire and Rescue

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1 Service?  
 2 A. Yes, they were.  
 3 Q. What did you understand that person's role to be?  
 4 A. I knew that they were a NILO, I'd had several contacts  
 5 with them in the past, I didn't know if they were the  
 6 on-duty NILO necessary, but I knew that they were  
 7 a NILO.  
 8 Q. What, if anything, did they say to you about where the  
 9 Fire and Rescue Service were so far as the Silver  
 10 control room?  
 11 A. They said they'd been instructed not to attend the  
 12 incident and not to leave the fire premises.  
 13 Q. And the "fire premises", was that a reference to the  
 14 command and control people or everyone?  
 15 A. Not North West Fire Control, but the version of Silver  
 16 control that you have in the Fire Service. I've not  
 17 been to their building to look at it.  
 18 Q. As I have understood you describing it, this is an  
 19 equivalent to the GMP Silver control room but at the  
 20 Fire and Rescue Service premises?  
 21 A. Yes, that's correct.  
 22 Q. You had understood that an instruction had been given  
 23 for those people based in that room not to leave?  
 24 A. Not -- yes, not to leave.  
 25 Q. You give a name in your witness statement, but you have

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1 some uncertainty about it. I think you say you thought  
 2 the person was called Neil?  
 3 A. That's correct. Neil was somebody I had known for many  
 4 years from the different roles that -- and I'd worked  
 5 with him in the past, so I had his phone number in my  
 6 phone from -- dating back maybe 6, 7 years.  
 7 Q. Do you have a surname that you can recall?  
 8 A. I can't remember his surname.  
 9 Q. This is Neil who was a NILO?  
 10 A. Correct.  
 11 Q. Did you understand the person that you were speaking to  
 12 was actually operational and part of the incident or  
 13 whether they were at home?  
 14 A. I believe that they were actually at the fire premises.  
 15 SIR JOHN SAUNDERS: Well, no doubt you can, if you haven't  
 16 supplied it already, the phone number you have for this  
 17 Neil.  
 18 A. I don't have that phone any more. I left GMP nearly --  
 19 SIR JOHN SAUNDERS: Okay.  
 20 A. I can give you more information to help to identify him.  
 21 MR DE LA POER: It may be if that can be done in writing  
 22 after you have completed your evidence that would be  
 23 extremely helpful. It may be that people sitting here  
 24 listening to this immediately know who you're talking  
 25 about but it's your evidence that we're focusing on now.

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1 After that conversation did you have any other  
 2 interaction with Greater Manchester Fire and Rescue  
 3 Service?  
 4 A. No, I didn't.  
 5 SIR JOHN SAUNDERS: Did you react to what he said at all?  
 6 A. I was surprised.  
 7 SIR JOHN SAUNDERS: I'm sure you were! Did you express your  
 8 surprise?  
 9 A. Other than a "oh" or something, probably not.  
 10 SIR JOHN SAUNDERS: So when they said, "We're not coming to  
 11 the fire, we're not coming to the incident", that must  
 12 have been a bit of a thunderbolt, mustn't it?  
 13 A. Yes, because I'd obviously incorrectly assumed that they  
 14 were already in attendance at the incident, at the  
 15 arena.  
 16 SIR JOHN SAUNDERS: But you didn't say to him, "Why  
 17 is that?"  
 18 A. I can't remember the details of the conversation, sir.  
 19 SIR JOHN SAUNDERS: Okay. Thank you.  
 20 MR DE LA POER: Did you relay what you'd been told to  
 21 ACC Ford?  
 22 A. I relayed at the end of the conversation which was that  
 23 somebody was en route.  
 24 Q. That somebody was en route?  
 25 A. Yes.

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1 Q. So I think that's part of the conversation that we  
 2 haven't yet heard about.  
 3 There was somebody en route; what were you told  
 4 about that?  
 5 A. In that telephone call I was told that somebody was now  
 6 en route to Silver.  
 7 Q. To Silver?  
 8 A. Yes.  
 9 Q. We can get the time from other sources but I don't think  
 10 you sitting there can recall when that NILO arrived  
 11 in Silver?  
 12 A. No, I don't know.  
 13 MR DE LA POER: Right. Thank you very much indeed,  
 14 Ms Buckle. Those are the questions that I have for you.  
 15 Can I now turn to Mr Wood to see if there are  
 16 questions on behalf of, I accept, Inspector Sexton but  
 17 possibly Mr Dexter as well?  
 18 Questions from MR WOOD  
 19 MR WOOD: One of each and a very short number of questions  
 20 if I may, sir.  
 21 I want to ask you firstly, please, about that  
 22 telephone conversation with Mark Dexter about who was  
 23 going to go to the scene. All right?  
 24 A. Yes.  
 25 Q. Could you just open your witness statement and go to

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1 paragraph 18 please. This was a conversation that took  
 2 place at 22.53; yes?  
 3 A. That's correct.  
 4 Q. So that's very early in the development of this  
 5 incident?  
 6 A. Yes.  
 7 Q. Thank you. And very shortly after you'd become aware it  
 8 and got dressed and got in the car?  
 9 A. Yes, that's correct.  
 10 Q. At the time you had that conversation, you were both in  
 11 your respective cars travelling towards Manchester; is  
 12 this right?  
 13 A. That's correct.  
 14 Q. You had what you have described as an adult conversation  
 15 about who would go to the scene including, you tell us,  
 16 the fact that he didn't have body armour and would have  
 17 to go and get some?  
 18 A. That's correct, yes.  
 19 Q. You were both coming from your respective home  
 20 addresses; is that right?  
 21 A. I believe so. I certainly was, I presume he was well.  
 22 Q. Don't answer this question if you don't know the answer,  
 23 and of course I am not remotely interested in where you  
 24 live now or then, but did you understand, if he was  
 25 coming from his home address, if that would be a similar

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1 area to where you were?  
 2 A. Um...  
 3 Q. If you don't know, just say so.  
 4 A. I knew roughly where he lived, not his address, but  
 5 I knew roughly where he lived.  
 6 Q. Was that roughly the same area where you were travelling  
 7 from?  
 8 A. One's on the west side and one's on the east— side.  
 9 Q. All right. Not very far away from each other?  
 10 A. Not very far away, no.  
 11 Q. I'm not going to take that any further, I think, for  
 12 obvious reasons.  
 13 He didn't say when he was going to get to the arena,  
 14 you told us earlier.  
 15 A. That's correct, yes.  
 16 Q. But in any event, your understanding at the end of that  
 17 conversation with him was that he would get to the arena  
 18 before you; is that right?  
 19 A. That was my belief, yes.  
 20 Q. I ask you that question because the words of your  
 21 witness statement, paragraph 18, are:  
 22 "I knew that as we were both at that time travelling  
 23 from our respective home addresses towards Manchester,  
 24 he would arrive before me."  
 25 All right?

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1 A. Yes.  
 2 Q. So irrespective of how long it actually took to get to  
 3 the different places, when you finished that  
 4 conversation it would appear that between you, the  
 5 decision was he was going to get there before you?  
 6 A. Yes.  
 7 Q. A second small point in respect of the deployment as  
 8 ground—assigned. You can't remember now whether you  
 9 knew before that phone conversation or found out shortly  
 10 afterwards that he had been on the specialist TFC  
 11 course?  
 12 A. That's correct, yes.  
 13 Q. In fact, sir, for your reference, it's paragraph 16 of  
 14 Mr Dexter's witness statement. He had been on that  
 15 course in fact between 7 and 12 May 2017, so very  
 16 shortly before this incident.  
 17 A. I don't know the dates.  
 18 Q. But he having been on that course, and I think you told  
 19 the chair earlier, made him a more appropriate candidate  
 20 to be a ground—assigned TFC; do you agree?  
 21 A. Yes, it did.  
 22 Q. Thank you.  
 23 Next topic on behalf of Mr Sexton, please. Could  
 24 we have the transcript back up of the telephone  
 25 conversation about the handover, please? It's

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1 {INQ018857T/4}.  
 15:30:59 2 The counter time is 00:21:06. You say to  
 3 Inspector Sexton as he then was:  
 4 "If you just give us 5 minutes I'll speak to the —  
 5 the TS — sorry, the [something inaudible] here who has  
 6 just arrived and I'll give you a call back, if that's  
 7 all right."  
 8 Do you see that?  
 9 A. I do.  
 10 Q. We can check it if we need to, but I think as we were  
 11 listening to the audio transcript, the inaudible section  
 12 of that could be heard to be the words "tac ad".  
 13 A. That would make sense.  
 14 Q. Would that mean tactical adviser?  
 15 A. It would, yes.  
 16 Q. So you're suggesting at that point that you're going to  
 17 ring Inspector Sexton back having spoken to the tac ad;  
 18 is that right?  
 19 A. Yes.  
 20 Q. Why do you want to speak to the tactical adviser rather  
 21 than, for example, Superintendent Thompson about when  
 22 the handover was going to take place?  
 23 A. I can't remember in detail, but I think I thought they  
 24 would have been speaking on the phone and he would be  
 25 able to tell me when he's most likely to arrive.

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1 Q. Having said, "I'll give you a call back if that's all  
 2 right", did you in fact call back Inspector Sexton?  
 3 A. I did, a little bit later.  
 4 Q. Was it before or after he'd had command relieved of —  
 5 A. It was before.  
 6 Q. Do you know what time that was?  
 7 A. I think it's on this list.  
 8 (Pause)  
 9 It's not on this list.  
 10 Q. I'm not going to ask any more about that. I can't see  
 11 that call, about 40015(?). If I am wrong about that,  
 12 I'll be corrected. All right?  
 13 A. It's definitely on there, sir.  
 14 MR WOOD: Very well. That's all I ask, thank you.  
 15 SIR JOHN SAUNDERS: Thank you.  
 16 MR DE LA POER: Thank you. Next in the event that there are  
 17 any questions arising, Mr Smith Queen's Counsel, please,  
 18 from North West Fire Control.  
 19 Questions from MR SMITH  
 20 MR SMITH: Yes, please.  
 21 May I take you to paragraph 30 of your witness  
 22 statement of 4 December 2019, please.  
 23 In this paragraph you deal with your telephone call  
 24 to the representative of the Fire and Rescue Service.  
 25 A. Yes, that's correct.

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1 Q. Do you think you have a good recollection of that part  
 2 of the night's events?  
 3 A. Other than the name of the individual, yes, I do.  
 4 Q. Can I start at the bottom of that paragraph:  
 5 "Station Manager Lawlor, whose name was Mick or  
 6 Michael but was commonly known as Mick, arrived in  
 7 Silver at 00.05."  
 8 Did you know him?  
 9 A. I did know him, yes.  
 10 Q. And did you remember him arriving?  
 11 A. No, sir, I didn't know he'd arrived.  
 12 Q. Did you think that he was the duty NILO?  
 13 A. I don't know. I don't know, sir. He's not the person  
 14 I spoke to on the phone.  
 15 Q. In paragraph 30, you say, just over halfway down that  
 16 paragraph:  
 17 "He confirmed to me that he was the on—duty NILO and  
 18 that he was on his way in to Silver."  
 19 Is that your recollection?  
 20 A. The person I spoke to I believe was on duty, I don't  
 21 think it was Mick.  
 22 Q. Mr Lawlor was the inter—agency NILO lead for the Fire  
 23 and Rescue Service and was regularly in  
 24 GMP Headquarters?  
 25 A. Absolutely, I've seen him many times.

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1 Q. Do you think that's the person you spoke to when you  
 2 made the telephone call?  
 3 A. No, I believe it's Neil.  
 4 Q. If I give you the name Gaskell, does that fit with Neil?  
 5 A. Yes, it does.  
 6 Q. So you spoke to Neil Gaskell?  
 7 A. I believe so, yes.  
 8 Q. So the situation we have therefore is that your  
 9 recollection is of making a call to Neil Gaskell and  
 10 that, at some stage, a representative from the Fire and  
 11 Rescue Service, Mr Lawlor, arrived at Silver; is that  
 12 correct?  
 13 A. I don't know when Mr Lawlor arrived at Silver. If you  
 14 tell me that he did, I wouldn't disagree with you.  
 15 SIR JOHN SAUNDERS: Do you know that he did arrive from your  
 16 own knowledge or you just have no idea?  
 17 A. I have no idea at all, sir.  
 18 SIR JOHN SAUNDERS: Okay, thank you.  
 19 MR SMITH: In that paragraph, you don't make any reference  
 20 to the conversation that you told the inquiry about in  
 21 answer to Mr de la Poer a short time ago, do you?  
 22 A. No, I didn't.  
 23 Q. Could I just ask you again, what do you remember was  
 24 given to you by way of information in terms of the  
 25 deployment or otherwise of the Fire and Rescue Service

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1 at the time when you made that call? What can you  
 2 remember?  
 3 A. I remember being told that they'd been told not to leave  
 4 the fire premises -- I was just surprised --  
 5 Q. (Overspeaking) -- I'm so sorry, I cut across you.  
 6 A. I was very surprised.  
 7 Q. Was any mention made of Philips Park Fire Station?  
 8 A. I certainly became aware that Philips Park Fire Station  
 9 had been used as a deployment location but I don't know  
 10 where that fits with the phone call, whether it's  
 11 before, after or whether it was discussed in the phone  
 12 call.  
 13 Q. Just looking back now, and this is all I want to ask  
 14 you, please, do you think, just trying to remember this  
 15 conversation, that you might have been told that the  
 16 Fire Service was being held or had been held first of  
 17 all at Philips Park Fire Station?  
 18 A. I was aware at some point that the Fire Service had been  
 19 held at Philips Park, yes.  
 20 Q. Do you remember whether you were told, whether it was  
 21 intended that they would deploy to Manchester Central?  
 22 A. I don't know, sorry.  
 23 Q. You can't remember anything of that nature?  
 24 A. The purpose of my phone call was to establish where the  
 25 NILO was from the Fire Service, so that was my focus.

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1 MR SMITH: Thank you very much for your help.  
 2 SIR JOHN SAUNDERS: Thank you, Mr Smith.  
 3 MR DE LA POER: Thank you. Next, please, Ms Johnson on  
 4 behalf of GMFRS.  
 5 Questions from MS JOHNSON  
 6 MS JOHNSON: Ms Buckle, I just want to ask you a couple of  
 7 questions on the issue that has just been dealt with by  
 8 Mr Smith.  
 9 The first question: the telephone number you called  
 10 to contact the NILO that evening, do you remember where  
 11 you got it from, whether you called the duty NILO number  
 12 that GMP had or whether you called a number that you  
 13 personally had?  
 14 A. I believe I called a number I personally had.  
 15 Q. Can you remember why you decided to do that, to call  
 16 a personal number rather than to look up who was  
 17 actually on duty?  
 18 A. I think because it was literally in my phone.  
 19 Q. Mr Smith has taken you to the difference between the  
 20 information that you have given to the inquiry and the  
 21 information that's contained in paragraph 30 of your  
 22 statement. Can I just ask you, first of all, this: why  
 23 is it that you didn't include in your statement the  
 24 information that you have given today about being told  
 25 that the individual was at the fire Silver and wasn't

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1 being -- they weren't being allowed to deploy?  
 2 A. Sorry, just repeat the question, please.  
 3 SIR JOHN SAUNDERS: Why didn't you include it in your  
 4 statement?  
 5 A. I don't know, sir.  
 6 MS JOHNSON: Could we look at paragraph 30? You told the  
 7 inquiry told that the person you spoke to was, you  
 8 believe, at fire Silver and someone was on there way,  
 9 but you said in paragraph 30 this, if you could have  
 10 a look five lines down:  
 11 "As I recall, he confirmed to me that he was the  
 12 on-duty NILO and that he was on his way into Silver."  
 13 Can you explain the difference between those pieces  
 14 of evidence?  
 15 A. No. Sorry, I can't.  
 16 MS JOHNSON: Those are my questions.  
 17 Sir, we will obtain a statement from Mr Gaskell  
 18 because, as the inquiry may well know, he wasn't in fact  
 19 on duty on the evening of the incident.  
 20 SIR JOHN SAUNDERS: Thank you.  
 21 MR DE LA POER: Next, can I invite Mr Weatherby Queen's  
 22 Counsel who is taking the lead so far as the families  
 23 are concerned.  
 24 Questions from MR WEATHERBY  
 25 MR WEATHERBY: Can I start with three points just arising

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1 from the evidence this afternoon, lest I forget them.  
 2 The fact that you waited for Mr Thompson delayed the  
 3 handover from the FDO objectively by about 45 minutes,  
 4 didn't it?  
 5 A. Yes, it did.  
 6 Q. Because your evidence is that you arrived at HQ at just  
 7 after 23.15. We know the handover actually took place  
 8 about an hour later and I think you told us that  
 9 it would have taken you about 15 minutes or thereabouts  
 10 to get ready for handover. So 45 minutes?  
 11 A. Yes, that's correct.  
 12 Q. You've referred to this matter of a double handover. In  
 13 the context of this sort of situation, 45 minutes is  
 14 a long time, isn't it?  
 15 A. It is, yes.  
 16 Q. Therefore we shouldn't be looking at double handover as  
 17 something that's going to lead to people falling over  
 18 each other. There's an expanse of time here which could  
 19 have been used more usefully if there had been  
 20 a handover from one commander to another; yes?  
 21 A. With the benefit of time, yes, sir, I can see that.  
 22 Q. Yes, okay. Hindsight is a wonderful thing and of course  
 23 it was open to you to ask Mr Thompson where he was.  
 24 A. Yes, it was, sir.  
 25 Q. The second of the short points to start with.

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1 Mr Dexter, you told us, had indicated that, I think,  
 2 he'd deployed assets to Piccadilly. Did I hear you  
 3 right?  
 4 A. I don't know if I mentioned that but I was aware that  
 5 they had been deployed to Piccadilly, yes.  
 6 Q. It wasn't his job to deploy assets as ground-assigned  
 7 commander, was it?  
 8 A. No, it would have been the force duty officer's at that  
 9 point.  
 10 SIR JOHN SAUNDERS: Mr Weatherby, I'm sure you're right, but  
 11 was that actually said as part of a conversation between  
 12 Mr Sexton and Ms Buckle or was it a conversation with  
 13 Mr Dexter? I'm simply trying to deal from memory  
 14 without looking anything up.  
 15 MR DE LA POER: I don't know whether this helps you,  
 16 Mr Weatherby, I certainly don't propose to take over,  
 17 but if it is of assistance to your questioning, 6889  
 18 in the audio schedule is the conversation between  
 19 Chief Inspector Dexter and Ms Buckle at 23.30 in which  
 20 the deployment to Piccadilly is mentioned. I don't know  
 21 whether that assists or not. It may be what you're  
 22 mentioning.  
 23 MR WEATHERBY: It was just something earlier in the evidence  
 24 and I was just picking it up. The real question is  
 25 going to the roles, that in taking ground-assigned

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1 command with your agreement, Mr Dexter was taking  
 2 command of the on-scene police assets, armed assets --  
 3 we'll leave the unarmed assets on the side for the time  
 4 being -- but the point of having a ground-assigned and  
 5 a TFC at HQ was that one has an overview and may be  
 6 dealing with more than one scene and the one at  
 7 ground-assigned is simply dealing with one scene;  
 8 is that right?  
 9 A. Yes. That would be my understanding of it.  
 10 Q. I'll leave it there. Third quick point to start with.  
 11 You talked about an emergency search. As  
 12 I understand it, please correct me if I'm wrong, but an  
 13 emergency search is a known firearms tactic which is  
 14 a general tactic, so it might be used, for example, on  
 15 a kidnap or a robbery or a Gunchester normal firearms  
 16 operation; is that right?  
 17 A. I have not personally deployed it, but yes it could be.  
 18 Q. Yes. So it is a firearms tactic which is to effectively  
 19 tell armed officers: there may be a threat here, go and  
 20 have a look?  
 21 A. Yes, sir.  
 22 Q. The default tactic with Plato is decisive action, isn't  
 23 it?  
 24 A. Yes, sir.  
 25 Q. And there's a clear distinction, an important

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1 distinction, between the two, isn't there?  
 2 A. Yes, it is. Yes, there is.  
 3 Q. Can I start the main part of my questions then with  
 4 training. I just want you to help me -- I want you to  
 5 clarify the training that you'd had. Starting with your  
 6 statement, your 2019 statement which I think you have in  
 7 front of you, at paragraphs 12 and 13, you deal with  
 8 your training. You refer to Plato training in 2017;  
 9 yes?  
 10 A. Yes, sir.  
 11 Q. Can you help us with what that training was?  
 12 A. From recollection, sir, I think it was an input done --  
 13 delivered at firearms training, as in a front-loaded  
 14 lesson.  
 15 Q. So this was part of your ordinary TFC training, which is  
 16 recorded in your training record?  
 17 A. Yes, sir.  
 18 Q. And that, as you say in your statement, involved an  
 19 understanding of joint operating principles with the  
 20 emergency services in the event of a marauding terrorist  
 21 attack and requirements of both a ground-assigned TFC  
 22 and a TFC within the Silver control room. So prior to  
 23 the --  
 24 A. Sorry, sir, I think there's two separate lots of  
 25 training.

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1 Q. Right.  
 2 A. One was a one-day tabletop-type exercise with partners,  
 3 NWS, GMFRS --  
 4 Q. Yes.  
 5 A. -- at Thompson Street, although I don't have much  
 6 recollection of it, but there was definitely one on  
 7 firearms training separately.  
 8 Q. That's very helpful. So I'll come on to that and  
 9 develop that slightly more then.  
 10 In paragraph 12 you refer to JESIP training in 2014  
 11 and in paragraph 13 you refer to that JESIP training,  
 12 I think, because you're referring to training that  
 13 related to matters other than terrorist attack; is that  
 14 right?  
 15 A. Yes. I don't know if I've got confused as to which  
 16 training was held when and where. I certainly attended  
 17 some training at the Fire Service premises on  
 18 Thompson Street.  
 19 Q. Okay. Let me see if I can help and if I can't you'll  
 20 obviously tell me, but as I read it now, given the  
 21 document that was provided to us this morning, which is  
 22 your calendar, you undertook JESIP training in 2014 and  
 23 it looks to me, and you'll correct me if I'm wrong, that  
 24 that was the exercise that involved a plane crash --  
 25 A. That's entirely possible.

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1 Q. -- which you refer to in paragraph 13.  
 2 Then in paragraph 12 you talk about Plato training  
 3 in 2017 and I think you just told us that that was two  
 4 separate trainings, the first of which was the joint  
 5 commander training, which was the JESIP training with  
 6 NWS and FRS, and the second was specific TFC GMP  
 7 training which dealt with ground-assigned and Silver  
 8 control room tactical firearms commanders. Would that  
 9 be right?  
 10 A. I think that's right, yes.  
 11 Q. Okay, that's helpful.  
 12 A. It's certainly in my calendar and it looks like  
 13 I attended. If it was in my calendar, I would normally  
 14 attend. I wouldn't drop out of it.  
 15 Q. You may or may not know, but we've been trying to work  
 16 out who was and who wasn't at that commander training  
 17 course that was put on three times in January and  
 18 February. It seems plain from your calendar that it was  
 19 certainly one of those that was in your calendar because  
 20 the dates tie up. We have your training records and  
 21 there doesn't appear to be any record of attendance on  
 22 your training records. Should that sort of course  
 23 appear on your training records if attended?  
 24 A. Ideally, yes.  
 25 Q. Yes, I was going to ask why not if the answer was no.

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1 But it doesn't appear, I'll be corrected, to be on  
 2 there.  
 3 A. I have not seen it on there, sir.  
 4 Q. Your recollection is that you did attend?  
 5 A. Yes, sir.  
 6 Q. Let me see if I can jog your memory a little bit. This  
 7 was training that was set up essentially following JESIP  
 8 failures in the MTFA Exercise Winchester Accord in  
 9 May 2016.  
 10 A. I didn't know that is why it had been set up.  
 11 Q. Does that help?  
 12 A. I'd accept that.  
 13 Q. Did you know about the failures in Winchester Accord?  
 14 A. No, I didn't, sir.  
 15 Q. Would you accept that there were clear JESIP failures on  
 16 22 May?  
 17 A. It certainly seems that way.  
 18 Q. Do you think that you took away sufficient from the  
 19 training in January, if you did attend it, to equip you  
 20 to ensure that JESIP worked in practice?  
 21 A. Quite clearly, I didn't do anything to make it work on  
 22 the night. I can't add anything further to that, sorry.  
 23 Q. Yes. I want to explore that a little bit further.  
 24 At the minimum, the principles involved command of  
 25 an MTFA incident where Plato is declared, there has to

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1 be a communication of the declaration as soon as  
 2 possible to emergency service partners, doesn't it?  
 3 A. Sorry, you broke up a bit there. Could you repeat that?  
 4 SIR JOHN SAUNDERS: I think what's being said is that it's  
 5 required that when Plato is declared, that is  
 6 communicated as soon as possible to partners, ambulance  
 7 and fire; is that right Mr Weatherby?  
 8 MR WEATHERBY: Yes, and that was something highlighted at  
 9 this January training day; do you recall that.  
 10 A. I don't recall the details but I would expect it, just  
 11 from my broad knowledge of Plato, that it would be  
 12 communicated, yes.  
 13 Q. And the principles required the setting-up of effective  
 14 three-way communication between GMP and its two main  
 15 emergency service partners where a Plato has been  
 16 declared; yes?  
 17 A. Yes, there should be effective communication between the  
 18 three, yes.  
 19 Q. Three-way radio communications as soon as possible?  
 20 A. I don't know about the radio communications.  
 21 Q. It requires (overspeaking) --  
 22 A. I have no knowledge of that.  
 23 Q. It requires the setting-up of early co-location at or  
 24 near to the scene via rendezvous points and then forward  
 25 command posts?

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1 A. Yes, I agree with that.  
 2 Q. Those are all points that anyone attending that joint  
 3 commander's course should have had ingrained into them;  
 4 yes?  
 5 A. Yes, sir.  
 6 Q. They are headline points?  
 7 A. Yes, sir.  
 8 SIR JOHN SAUNDERS: Okay. Just stop for a moment so it's  
 9 not misunderstood. I think in relation to three-way  
 10 communication you're not saying particularly you  
 11 remember that being a part of the course or what you  
 12 were told to do?  
 13 A. I'm not aware of the three-way radio. I know you can  
 14 patch different radio channels in together but I have no  
 15 knowledge of how that operates.  
 16 SIR JOHN SAUNDERS: Right.  
 17 A. I would expect three-way communication at the forward  
 18 command post. I would expect there to be communication  
 19 there. There was no reason why there shouldn't have  
 20 been communication earlier.  
 21 MR WEATHERBY: Forget the setting-up of any technical  
 22 arrangement, but it was clear, wasn't it, that there  
 23 should be three-way communication between the control  
 24 rooms at as early a stage as is possible?  
 25 A. There should certainly be three-way communication

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1 between the services, yes.  
 2 Q. Can you help us on the night, given that you were  
 3 informed 30 minutes after the explosion and were  
 4 involved as the on-call TFC, what did you do to ensure  
 5 that those headlines principle were adhered to on the  
 6 night?  
 7 A. I didn't do anything specific.  
 8 Q. You've explained the leaving home and at that point you  
 9 weren't quite clear whether you were going to deploy to  
 10 HQ or to the scene or somewhere else and I think we've  
 11 understood that. You then have explained that there  
 12 were other commanders who were perhaps better equipped  
 13 than you for those tasks: Mr Dexter to go to the scene  
 14 and Mr Thompson to go to HQ; yes?  
 15 A. Yes, sir.  
 16 Q. Given that the threat level was severe at this time, do  
 17 you think there should have been a better policy to  
 18 ensure that specialist TFCs were on call in the event of  
 19 a terrorist outrage so that it wouldn't be left with  
 20 somebody with a lesser understanding of the command  
 21 situation?  
 22 A. It's not something I can really comment on, sir, but  
 23 yes --  
 24 Q. Okay --  
 25 SIR JOHN SAUNDERS: In a way it is almost common sense,

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1 isn't it, because if at the end of the day these roles  
 2 were handed over from you, for no doubt perfectly good  
 3 reasons, then actually you should never have had the  
 4 roles in the first place if we've got a level of  
 5 terrorism such as severe?  
 6 A. I can't disagree with you, sir. I just say that  
 7 obviously this was the first incident in  
 8 Greater Manchester and...  
 9 MR WEATHERBY: I understand that you don't set the policy  
 10 but you were the person that was on call when an outrage  
 11 such as this occurred and, no doubt, you would have been  
 12 aware of the threat level of severe.  
 13 A. I was, yes.  
 14 Q. And you would be aware, of course, that Manchester is  
 15 a huge place and it unfortunately could be Manchester  
 16 which would be faced with exactly what happened on the  
 17 night.  
 18 A. I can't disagree with you, sir.  
 19 Q. Had it occurred to you as the person who would be on  
 20 call to take this position to say to any of the firearms  
 21 commanders or senior management team that you thought it  
 22 was inappropriate for non-specialist TFCs to be put  
 23 in that position?  
 24 A. I hadn't said anything about it, no, sir.  
 25 Q. Can I ask you about the Greater Manchester Police Silver

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1 commander manual. As a Silver commander you'd be  
 2 familiar with that, wouldn't you?  
 3 A. I have looked at the document. I have never seen that  
 4 before. Is this the one from 2010?  
 5 Q. Yes. We understand it's the one that, again I'll be  
 6 corrected if I'm wrong, the one that was in force at the  
 7 time.  
 8 A. I have never seen it before, sir, until --  
 9 Q. You had never seen it before? Right.  
 10 A. It's out of date by some considerable way.  
 11 Q. Okay. Well, bearing in mind you had not seen it before  
 12 until Friday, you've had an opportunity of looking  
 13 at the references that we provided, I anticipate.  
 14 A. I have, yes.  
 15 Q. Can I just take you to a couple of sections and, given  
 16 that you hadn't seen it before, I'll take you to them as  
 17 briefly as I can.  
 18 Mr Lopez, could we have {INQ034751/1}. That's the  
 19 start of it. Can we scroll through it? It's a PDF file  
 20 with interactive links, so it's apparently made as easy  
 21 as possible to jump between relevant parts because it's  
 22 quite a lengthy document, it's got 300-plus pages. Can  
 23 we just keep going for a couple of pages?  
 24 Right. That's actually the front piece of it. This  
 25 is the Silver commander's guide and at the time you were

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1 a Silver commander, weren't you?  
 2 A. I became a Silver commander in 2010, yes.  
 3 Q. And you were still a Silver commander in 2017?  
 4 A. Yes, that's correct.  
 5 Q. Can we go to {INQ034751/60}?  
 6 SIR JOHN SAUNDERS: You said you had never seen it.  
 7 A. I first saw it on Friday night. It was sent to me.  
 8 SIR JOHN SAUNDERS: Were you aware of the existence of  
 9 a document like this?  
 10 A. Of this, no. It's too old and too out of date.  
 11 SIR JOHN SAUNDERS: Okay.  
 12 MR WEATHERBY: Well, sir, just for the note, this is  
 13 a document that was referred to by Mr Nawaz and unless  
 14 I'm told otherwise, my understanding is that it was  
 15 still current in 2017.  
 16 Mr Lopez, can you go back a page? And one more  
 17 page. {INQ034751/58}. This is the section of the GMP  
 18 Silver commander manual that deals with firearms and  
 19 we can see halfway down:  
 20 "Initial command responsibility and transfer of  
 21 command."  
 22 Can we go back to {INQ034751/60}, please. This is  
 23 the section that deals with spontaneous firearms  
 24 incidents. Can we highlight paragraph 3.4, please. I'm  
 25 sorry, I'm going slightly too fast here. Can I go back

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1 one page {INQ034751/59}?  
 2 Paragraph 3.4 {INQ034751/60}, the FDO has become the  
 3 initial TFC when he or she authorises the use of  
 4 firearms; yes?  
 5 A. Yes, that's correct. However, sir, this was replaced by  
 6 APP for armed policing in 2013.  
 7 Q. I'm sorry?  
 8 SIR JOHN SAUNDERS: This was replaced by APP, 2013.  
 9 MR WEATHERBY: Thank you. Right, okay. Well, it may be  
 10 then that I need to look at that document rather than  
 11 this.  
 12 SIR JOHN SAUNDERS: It doesn't look very different from what  
 13 happened or what was meant to happen on the night so  
 14 far, does it?  
 15 A. It has some differences.  
 16 MR WEATHERBY: All right. Maybe I can just take you through  
 17 this section and I won't bother with the other parts.  
 18 Let me take you through this section and then you can  
 19 help me by saying whether it had changed with the APP  
 20 and, of course, if that's an unfair question and you  
 21 don't know you must say so and we can then check it.  
 22 Paragraph 3.5 indicates that:  
 23 "As soon as it is reasonably practicable, a cadre  
 24 TFC will be contacted and confirm or otherwise the  
 25 initial actions taken."

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1 Then at 3.7:  
 2 "Command of the incident should be transferred to  
 3 a cadre firearms tactical commander as soon as  
 4 practicable."  
 5 Yes?  
 6 A. Yes. That's what it --  
 7 Q. As far as you can recall, was that the position that  
 8 remained with the APP or should we check that?  
 9 A. It's slightly different, sir.  
 10 SIR JOHN SAUNDERS: Can you identify (overspeaking).  
 11 A. The initial tactical firearms commander, that bit is  
 12 exactly the same. In relation to handover, it does say:  
 13 "Effective command to be established as quickly as  
 14 possible and to be undertaken by the most appropriate  
 15 person available."  
 16 And then goes on to say:  
 17 "On occasions the initial tactical firearms  
 18 commander may be in a better position to continue in the  
 19 tactical firearms command role until a dedicated  
 20 tactical firearms commander is in a position to take  
 21 command."  
 22 MR WEATHERBY: Yes, okay. In the paragraph at 3.5, has  
 23 anything changed there so:  
 24 "As soon as it is reasonably practicable a cadre  
 25 tactical firearms commander will be contacted and

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1 confirm or otherwise the initial actions taken"?  
 2 A. (Pause). Sorry, I think it's possibly better  
 3 if we refer to the APP again.  
 4 Q. All right. Let me abandon the document.  
 5 SIR JOHN SAUNDERS: Have you got it there?  
 6 A. I have, sir, yes.  
 7 SIR JOHN SAUNDERS: You refer to the APP and we will see if  
 8 there is any difference.  
 9 A. The document is {INQ004140/7}. It starts at the bottom  
 10 of page 7.  
 11 SIR JOHN SAUNDERS: That's what we're on.  
 12 A. I think if we move to the one above, "Initial command of  
 13 incidents", in the middle paragraph of that:  
 14 "If incidents become protracted there should be  
 15 arrangements which enable command to be transferred to a  
 16 dedicated tactical firearms commander" --  
 17 SIR JOHN SAUNDERS: I'm sorry, not everyone has this to look  
 18 at. Can you read it a bit slower?  
 19 A. "If incidents become protracted, there should be  
 20 arrangements which enable command to be transferred to  
 21 a dedicated tactical firearms commander thereby enabling  
 22 others to return to their normal duties. The command of  
 23 the duty and responsibility for its management rests  
 24 with the initial commander until such time as command is  
 25 transferred. They must ensure that all officers are

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1 sufficiently briefed, information flows are established,  
 2 and all officers are given as full a briefing as  
 3 possible in the time available."

4 SIR JOHN SAUNDERS: Thank you.

5 MR WEATHERBY: That's very helpful, thank you, and I am very  
 6 sorry I put the wrong document to you.

7 Would you agree that as somebody being contacted as  
 8 the on-call TFC it was one of your duties to, before any  
 9 handover occurred, to contact and confirm the initial  
 10 actions taken?

11 A. Yes, it was. I was -- before I got into the car  
 12 I wasn't really aware of what the circumstances of the  
 13 incident were, so that would have necessitated getting  
 14 on to the radio, which was difficult, or making phone  
 15 calls to FDO to go through what had been determined.

16 Q. In terms of your interactions with either Mr Sexton or  
 17 the OCR, did you confirm things that had been done?

18 A. Only via the radio.

19 Q. Did you ask for a list of things that had been done or  
 20 go through things that had been done by the FDO or the  
 21 OCR?

22 A. I was just picking them up as they came on the radio.

23 Q. So you were just listening to them on the radio?

24 A. I was (overspeaking).

25 SIR JOHN SAUNDERS: (Overspeaking)?

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1 A. Yes, I was, sir.

2 SIR JOHN SAUNDERS: Thank you. Now Mr Weatherby.

3 MR WEATHERBY: You were listening to the radio but did you  
 4 prompt things that hadn't been done? Did you consider  
 5 what hadn't been done by the FDO or the OCR more  
 6 generally.

7 A. No, I didn't.

8 Q. For example, did you check whether a tactical plan had  
 9 been formed by the FDO and communicated to the armed  
 10 officers on scene?

11 A. No. That would have been done before I got into the  
 12 car.

13 Q. Yes.

14 SIR JOHN SAUNDERS: I think the question was did you check  
 15 the --

16 A. Sorry, did I check? No, I didn't check specifically.

17 SIR JOHN SAUNDERS: Thank you.

18 MR WEATHERBY: Did you check that the unarmed responders who  
 19 were at the scene or who were attending at the scene had  
 20 been warned of the Plato declaration and the  
 21 consequences of that?

22 A. No, I didn't, sir.

23 Q. So for example, did you check whether a Bronze commander  
 24 had been established at the scene?

25 A. No, I didn't, sir.

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1 Q. Or whether Bronze commander or others at the scene had  
 2 been given Stay Safe reminders?

3 A. No, I didn't, sir.

4 Q. Or checked whether they'd been asked to evacuate  
 5 civilians or be the eyes and ears of the FDO?

6 A. No, I didn't.

7 Q. Did you liaise with the Night Silver about the command  
 8 of unarmed officers at all?

9 A. No, I didn't.

10 Q. Was there a reason that you didn't do any of that?

11 A. Some of it had obviously taken place before I got  
 12 notified or I believed it had taken place before I got  
 13 notified. In relation to the Night Silver commander,  
 14 the Silver commander that was on duty I didn't know  
 15 where he was and I didn't actually try to contact him.

16 Q. Was there any reason why not?

17 A. I thought he was busy managing it.

18 Q. Did you check whether the partner agencies had been  
 19 informed of the declaration of Plato?

20 A. No, I didn't.

21 Q. Again, any reason?

22 A. Only Annemarie Rooney was in the building when I got  
 23 there. I didn't think at the time that they didn't  
 24 know. I assumed that they did. Clearly with hindsight  
 25 that was wrong.

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1 Q. Did you make sure that a joint RVP had been set and  
 2 agreed and communicated with partner agencies?

3 A. No, I didn't.

4 Q. Or that a forward command post had even been considered?

5 A. No, I didn't. I was aware that there had been an RVP --  
 6 actually, it was mentioned on the radio at some point.

7 Q. Did you check whether the Plato declaration had been  
 8 reviewed or kept under review?

9 A. No, I didn't.

10 Q. Did you check whether a major incident had been  
 11 declared?

12 A. No, I didn't.

13 Q. You mentioned that you did speak to ACC Ford. What  
 14 action points came out of any of your discussions with  
 15 ACC Ford?

16 A. Only the ones that have been discussed separately  
 17 in relation to the casualty bureau and the Fire Service  
 18 contacts.

19 Q. You've mentioned Annemarie Rooney. I think you said  
 20 that you introduced yourself to her. Am I right that  
 21 there was no further discussion with her about Plato or  
 22 how any kind of joint operating issues were going?

23 A. No, I thought they were aware.

24 SIR JOHN SAUNDERS: So Silver control, having everybody  
 25 there, the idea that makes JESIP work, everyone knows

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1 what happening and all the rest of it , was there  
 2 actually any discussion going on between any police  
 3 commander and Annemarie Rooney as far as you could see?  
 4 A. I don't know, sir. I don't know what I've read now and  
 5 what I actually knew at the time.  
 6 SIR JOHN SAUNDERS: Right.  
 7 MR WEATHERBY: You have made no record, have you, of any  
 8 discussion with Annemarie Rooney?  
 9 A. No, I didn't make any record, sir.  
 10 (Pause)  
 11 SIR JOHN SAUNDERS: Take a moment. We don't want people to  
 12 choke. Thank you.  
 13 (Pause)  
 14 A. I'm okay.  
 15 SIR JOHN SAUNDERS: Okay, thank you, Mr Weatherby.  
 16 MR WEATHERBY: I haven't got very much more. You have  
 17 mentioned speaking to Mr Dexter and I'm not going to go  
 18 over the ground that we've already been over. But at  
 19 23.30 or thereabouts, when you were speaking to  
 20 Mr Dexter, you hadn't taken command at all, so the  
 21 actual ITFC was still Mr Sexton and Mr Sexton was the  
 22 ground—assigned TFC.  
 23 A. That's correct.  
 24 Q. What were you seeking to achieve by not taking control  
 25 but speaking to Mr Dexter?

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1 A. He rang me to update me on what he'd done so far.  
 2 Q. Was that because Mr Dexter thought that you were taking  
 3 over from Mr Sexton?  
 4 A. I think there's a point in the conversation where he  
 5 pauses and I think I've said at that point, and  
 6 I appreciate it's not recorded, that Craig's coming in  
 7 to do it.  
 8 Q. You've been asked about the conversation at about 23.40  
 9 or 23.41. Again I won't go over the ground we've  
 10 already been over, but it has been put to you already  
 11 that you didn't mention that you weren't going to take  
 12 over, that Mr Thompson was going to take over, and  
 13 you've given your answer on that.  
 14 What other assistance did you give or offer to  
 15 Mr Sexton during that conversation?  
 16 A. I didn't, sir.  
 17 Q. Was there any reason for that?  
 18 A. To provide any effective assistance I would have had to  
 19 travel over to his location and that would have taken me  
 20 15 or 20 minutes.  
 21 Q. You could have acted as his prompter and asked him about  
 22 the things that he had done and hadn't done and  
 23 therefore picked up the things that had been missed.  
 24 A. As you can see by the conversation and how it breaks  
 25 down, it was very difficult to have a telephone

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1 conversation because of everything else that was going  
 2 on at the same time. Yes, I could have done that.  
 3 Q. And I think just to fill -- moving on from that, you  
 4 indicate that Mr Thompson arrived 7 or 8 minutes later  
 5 and then took over, as we have heard, at about quarter  
 6 past or 17 minutes past midnight.  
 7 Just for completeness, I think, it was actually at  
 8 midnight itself , 23.59.34, when you had a further call  
 9 with Mr Sexton to tell him that Mr Thompson had arrived  
 10 and would take over when he was ready. Does that accord  
 11 with your recollection ?  
 12 A. Yes, it does.  
 13 Q. Then finally, two short points. If you'd been asked by  
 14 Mr Sexton whether it was acceptable to keep the fact of  
 15 the Plato declaration from any of your emergency service  
 16 partners, would you have agreed with that or not?  
 17 A. I can't ...  
 18 SIR JOHN SAUNDERS: You presumably need to know the reason  
 19 he was suggesting that, would you?  
 20 A. Sorry, the reason he was suggesting that we didn't  
 21 notify?  
 22 SIR JOHN SAUNDERS: Yes.  
 23 A. I would have needed to know, yes. I just assumed he'd  
 24 done it in the beginning.  
 25 SIR JOHN SAUNDERS: It runs contrary to the whole idea of

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1 JESIP.  
 2 A. It does, absolutely it does.  
 3 SIR JOHN SAUNDERS: Is that a good enough answer,  
 4 Mr Weatherby?  
 5 MR WEATHERBY: One follow-up point: is there anything you  
 6 can think of which would have justified not telling the  
 7 emergency service partners about the declaration of  
 8 Plato, bearing in mind the clear policy and your  
 9 training?  
 10 A. It's a requirement of the policy and I therefore think  
 11 it should have been done.  
 12 SIR JOHN SAUNDERS: Did you hear Mr Sexton's evidence?  
 13 A. I heard some of it.  
 14 SIR JOHN SAUNDERS: Did you hear his explanation of why he  
 15 didn't want them to know?  
 16 A. I did hear that bit, yes.  
 17 SIR JOHN SAUNDERS: If you'd said that to you at the time  
 18 and said, "Is that all right, boss?", what would  
 19 you have said?  
 20 A. We'd have had a further conversation as to why.  
 21 SIR JOHN SAUNDERS: You have heard, he's said it quite often  
 22 in quite a lot of detail to us. If he said it to you in  
 23 all that detail and said, "What do I do boss?", is that  
 24 right?  
 25 A. It's not right.

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1 SIR JOHN SAUNDERS: But would you have agreed to him doing  
2 it?  
3 A. I doubt it.  
4 SIR JOHN SAUNDERS: Would you have kept the decision for  
5 yourself or would you have gone and talked to ACC Ford  
6 about it?  
7 A. ACC Ford. When you're going so contrary to a policy and  
8 you've got somebody else present of that more  
9 significant rank and role, then yes, ACC Ford.  
10 SIR JOHN SAUNDERS: Okay. Sorry to take that away,  
11 Mr Weatherby.  
12 MR WEATHERBY: No, that's very helpful. Those are my  
13 questions. Thank you very much.  
14 SIR JOHN SAUNDERS: Thank you. Just before we have the  
15 final questions --  
16 MR DE LA POER: It won't quite be final, but it may be that  
17 if it arises that you want to deal with it now.  
18 SIR JOHN SAUNDERS: Thank you.  
19 As you're going towards -- as you've left home you  
20 don't know whether you're going to be ground--assigned --  
21 A. Correct.  
22 SIR JOHN SAUNDERS: -- or whether you're going to go to  
23 Silver?  
24 A. Yes.  
25 SIR JOHN SAUNDERS: If you were going to be ground--assigned,

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1 what would you understand would be your responsibilities  
2 when you arrived there towards unarmed officers?  
3 A. I'd anticipate that the unarmed officers would come  
4 under a different command structure, although I would  
5 have some responsibility for protecting them and anybody  
6 else who's at the scene who's unarmed.  
7 SIR JOHN SAUNDERS: How would you exercise that duty to  
8 protect them?  
9 A. By discussion with their own command and making sure  
10 that Stay Safe was being delivered.  
11 SIR JOHN SAUNDERS: And you would expect there to be a  
12 separate commander for the unarmed?  
13 A. I would, yes.  
14 SIR JOHN SAUNDERS: Thank you.  
15 MR DE LA POER: Sir, in the course of Ms Buckle's evidence  
16 we've received an application made by the  
17 Slater & Gordon team and, as we understand it, it's  
18 a matter arising from this witness's evidence and the  
19 indication is it will be only 5 minutes and there are no  
20 new documents so in those circumstances we would invite  
21 you to accede to that.  
22 SIR JOHN SAUNDERS: The time at the moment by that clock is  
23 20 past, so 5 minutes it is.  
24 Questions from MR COOPER  
25 MR COOPER: I ask these questions on behalf of the families

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1 but I'm particularly delegated to lead later on the Fire  
2 Service issues so it's very much focused on that and  
3 it's very much focused on 10 lines in your statement at  
4 paragraph 30 and then I have a few questions to put to  
5 you based on that. Let's remind ourselves of your  
6 paragraph 30. That's all I'm asking you about:  
7 "I recall making a call to GMFRS NILO to ascertain  
8 why he -- I think his name was Neil -- was not at  
9 Silver. I believe I was asked by Ford to make this call  
10 but cannot now be certain. GMFRS were not in Silver  
11 control when I arrived, which I thought was unusual,  
12 because they were usually the first to arrive. I am  
13 unable to recall now when this call was made. I recall  
14 he confirmed to me that he was the on-duty NILO and that  
15 he was on his way into Silver. I do not recall having  
16 any further conversations with the NILO and informed  
17 Ford that he was en route. I cannot now recall what  
18 time the NILO arrived in Silver."  
19 You've indicated that you think that the individual  
20 you spoke to had a first name of Neil; is that right?  
21 A. I believe so. I certainly ... It's made me question it,  
22 but I still think it was Neil I spoke to.  
23 Q. And A Neil Gaskell has been put to you?  
24 A. Yes.  
25 Q. What about Neil Helmrich, does that ring a bell?

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1 A. I don't know him.  
2 Q. So the individual you spoke to was someone that you'd  
3 had -- his number on your phone in advance; is that  
4 right?  
5 A. Yes, that's correct.  
6 Q. So it was someone you'd spoken to on a number of  
7 occasions, no doubt, in the past?  
8 A. Yes.  
9 Q. And you I think it was Neil Gaskell, do you?  
10 A. I think it was Neil Gaskell.  
11 Q. As has been alluded to by my learned friend Ms Johnson,  
12 I think it was, we've got a statement from Mr Gaskell  
13 who says this: that when this tragedy occurred and was  
14 developing, he was enjoying a few glasses of wine with  
15 friends, he says in his statement, and his wife told him  
16 that he'd had too much to drink, very sensibly, and  
17 could not attend, so that what he says in his statement.  
18 Does that affect your recollection in any way as to  
19 whether this was Mr Gaskell you spoke to?  
20 A. Well, he is clearly saying that he didn't speak to me  
21 that night.  
22 Q. He did not attend because he had been in a social  
23 arrangement and sensibly said he'd had too much drink  
24 and he was inappropriate to drive, I presume.  
25 A. I understand entirely what you're saying but I believe

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1 that I'd spoken to Neil.  
 2 Q. So your view is you believe you spoke to him. Are you  
 3 certain or very certain of that?  
 4 A. I'm less certain than I was before.  
 5 Q. It may well be that you did speak to him. I'm not  
 6 trying to shake your evidence on this, I'm just trying  
 7 to understand how sure you are that you did speak to  
 8 him. For instance, did you recognise his voice, having  
 9 spoken to him on a number of occasions?  
 10 A. I thought I was speaking to Neil. That's all I can say,  
 11 sir.  
 12 Q. All right.  
 13 SIR JOHN SAUNDERS: What a shame we've lost your phone. Not  
 14 that you've lost it. It's gone back.  
 15 MR COOPER: When whoever it was, and you think it was  
 16 Neil Gaskell, said this to you, you have already  
 17 indicated this surprised you.  
 18 A. It did, yes.  
 19 Q. And I think you refer to it like a thunderbolt when he  
 20 said that to you.  
 21 SIR JOHN SAUNDERS: I think I said that.  
 22 MR COOPER: Do you adopt that, that it was like  
 23 a thunderbolt?  
 24 A. It was yes, certainly surprising to me.  
 25 Q. And unusual given your past experience of the way the

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1 Fire Service have reacted in the past?  
 2 A. Absolutely, sir.  
 3 Q. Well, then who did you tell immediately, no doubt, this  
 4 thunderbolt hitting you, that fire were not on the way?  
 5 A. They were on the way by then --  
 6 Q. All right.  
 7 A. -- because that was the end of the conversation that  
 8 there were -- the NILO was on his way --  
 9 Q. They were going to be delayed at the very least?  
 10 A. No, that they were actively on the way.  
 11 SIR JOHN SAUNDERS: There was two things, weren't there?  
 12 First of all, they're not going to the scene, he told  
 13 you as I understand it.  
 14 A. I don't know whether he said -- not deployed was the  
 15 (overspeaking) --  
 16 SIR JOHN SAUNDERS: Not deployed? Secondly, they'd been  
 17 told not to come to Silver but they were now on their  
 18 way.  
 19 A. Yes.  
 20 SIR JOHN SAUNDERS: Okay.  
 21 MR COOPER: I'll just focus on the not deploying. That must  
 22 have been a shock to you?  
 23 A. It was.  
 24 Q. And it was quite a significant thing to be told, isn't  
 25 it, that a key blue light service, particularly given

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1 the catastrophe that just happened were not deploying?  
 2 A. Yes.  
 3 Q. Did you feel it was therefore appropriate perhaps to  
 4 tell someone that this blue light service in the face of  
 5 this catastrophe were not deploying?  
 6 A. No, I didn't.  
 7 Q. Why not?  
 8 A. No, I don't know. I'm sorry, I just ...  
 9 Q. Looking back on it now --  
 10 A. I had assumed they were actually at the scene.  
 11 Q. Did it not cross your mind -- you are an experienced  
 12 police officer -- whether they were at the scene or not,  
 13 the fact they were not deploying was very, very unusual,  
 14 wasn't it?  
 15 A. It was unusual, yes.  
 16 Q. And given that situation it was something, no doubt,  
 17 you'd want to tell your superiors or certainly  
 18 colleagues that the Fire Service were maybe at the scene  
 19 but doing nothing?  
 20 A. No, I'm sorry. I've maybe have not come across very  
 21 well with that. I understand -- my understanding from  
 22 the conversation was that they were -- they'd been  
 23 retained at Fire Service premises --  
 24 Q. Yes.  
 25 A. -- by instruction.

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1 Q. Maybe, but whatever the terminology used, the Fire  
 2 Service were in and around the scene but had told you  
 3 that they were doing nothing effectively.  
 4 A. In my head, they were already there. They were there  
 5 almost before I was notified myself they would have  
 6 already been deployed. I didn't know that they weren't  
 7 there it was a very big surprise when I was told that.  
 8 Q. Let me leave it this way with the last question and  
 9 hopefully within the 5 minutes I have asked for. It was  
 10 so obvious to you that they should be deployed that it  
 11 didn't even cross your mind that they weren't?  
 12 A. Yes, that's correct.  
 13 MR COOPER: Thank you.  
 14 SIR JOHN SAUNDERS: A 70% overrun, I think, Mr Cooper.  
 15 MR COOPER: Slight, I'm sorry.  
 16 MR DE LA POER: While Mr Cooper was on his feet, Mr Wood has  
 17 been in touch with me to indicate that he wishes to  
 18 correct something he said and on that basis, I think,  
 19 given it only takes a minute, it's probably best to come  
 20 from him.  
 21 Further questions from MR WOOD  
 22 MR WOOD: It will only take a minute and it relates to the  
 23 telephone call at 23.59.  
 24 Firstly, Ms Buckle, I owe you an apology, you're  
 25 quite right, you did have another conversation with

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1 Mr Sexton before he handed over — had control taken off  
 2 him by Craig Thompson. I wonder if we can just very  
 3 briefly look at the transcript of that call, if we may?  
 4 The reference is {INQ018858T/1}.

5 Can you see there, Ms Buckle, you telephone  
 6 Inspector Sexton at a time we know is 23.59 and say,  
 7 "Dale, it's Rachel"?

8 A. Yes, sir.

9 Q. And you tell him that Craig Thompson is there:  
 10 "He's just catching up very quickly and then he'll  
 11 take over from you."

12 A. Yes.

13 Q. So that appears to be the first time Inspector Sexton is  
 14 told about that plan and that's just before midnight;  
 15 is that right?

16 A. Yes.

17 Q. In the next line down, the next thing you do is ask him  
 18 to organise some explosives dogs; is that right?

19 A. Yes.

20 Q. And he tell you he is going to have to ring around  
 21 forces to get that. You suggest to him:  
 22 "How about ringing round one force and tell them to  
 23 take it?"

24 And he says he'll speak to Merseyside you say,  
 25 "Brilliant", and that's the end of the telephone call.

225

1 A. Yes, sir.

2 Q. So although he's been told that he is going to be  
 3 relieved of command at some point in the near future, in  
 4 fact at that time he is being given an extra task, which  
 5 looks to be quite a time-consuming and difficult one; do  
 6 you agree?

7 A. I don't know. It would obviously take some time.  
 8 Whether it would be time-consuming I don't know. It's  
 9 not something I've had to do myself.

10 MR WOOD: Very well. Sir, that's all I ask and thank you  
 11 for the indulgence in making the correction.

12 MR DE LA POER: Sir, we've been going for an hour and a half  
 13 since our last break and I hope Mr Horwell won't regard  
 14 me as being impertinent if I make an enquiry of him as  
 15 to what his best estimate is as to whether we can,  
 16 within a modest period of time, complete that. I am not  
 17 seeking to put any pressure on him so far as he is  
 18 concerned.

19 SIR JOHN SAUNDERS: I am sure you wouldn't manage it.

20 MR HORWELL: About 10 minutes. So sir, if we can carry on  
 21 but it is a matter for others.

22 SIR JOHN SAUNDERS: Are you happy to go on for 10 minutes?

23 A. Ten minutes will be fine, sir.

24 SIR JOHN SAUNDERS: Are you sure?

25 A. Yes, sir.

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1 SIR JOHN SAUNDERS: Because it is obviously important that  
 2 you are able to concentrate. I know there is always a  
 3 desire to get these things over with.

4 A. Yes, sir.

5 Questions from MR HORWELL

6 MR HORWELL: Ms Buckle, I'm going to ask you some questions  
 7 about SFCs, TFCs and ITFCs so that we have some idea of  
 8 the numbers.

9 Sir, I haven't had these numbers yet confirmed but  
 10 this is the information I have so far received, that in  
 11 2017 there were five SFCs, 15 TFCs and seven ITFCs.  
 12 That's subject to confirmation, if I make that clear.

13 A. They sound about right.

14 Q. So there were three TFCs for every SFC, if those figures  
 15 are correct?

16 A. Yes, sir.

17 Q. You've been asked about the topic of handovers, whether  
 18 handovers should have been quicker, the reasons for your  
 19 decisions, and the decisions that others made and you've  
 20 referred already to the APP, which is the guidance  
 21 which the firearms world uses?

22 A. That's correct: it was at that time, I don't know if  
 23 it's changed since.

24 Q. I'm asking you about 2017. At page 8 of that  
 25 guidance — there's no need for the INQ number again

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1 unless anyone requests it — it sets out the various  
 2 factors that may become involved when there is  
 3 a handover and the words:  
 4 "On occasion the initial tactical firearms commander  
 5 may be in a better position to continue in the tactical  
 6 firearms command role until a dedicated tactical  
 7 firearms commander is in a position to take command."

8 You've been asked a number of questions as to  
 9 whether or not this could all have happened more  
 10 quickly, principally on the basis that you could have  
 11 put yourself forward and then had a second handover to  
 12 Mr Thompson.

13 A. Yes, correct.

14 Q. All that I'm asking you about, and let me make this very  
 15 clear, is about your state of mind that night and the  
 16 knowledge that you had and the reason for the decisions  
 17 that either you made or the decisions that others made.

18 The disadvantage, first of all, of too quick  
 19 a handover.

20 A. Yes, that was a very real risk if I'd taken command that  
 21 that would have happened.

22 Q. What are the dangers and summarise them, please?

23 A. The risk of misunderstanding information, some things  
 24 being documented from my perspective might not be the  
 25 way the next person — it's very difficult to get all

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1 the documentation done in that really tight time frame.  
 2 Q. And therefore there is, and we all understand the  
 3 disadvantages of the FDO continuing to be ITFC, but  
 4 there are also obvious advantages?  
 5 A. Yes, continuity of command unquestionably is an  
 6 advantage.  
 7 Q. So when you describe the two critical decisions in terms  
 8 of your position that night, first of all the  
 9 conversation that you had with Mr Dexter, he being  
 10 a specialist TFC and was so that night, did that to you,  
 11 that night, seem a sensible, logical decision?  
 12 A. I don't know at what point I became aware he'd become  
 13 a specialist, whether I'd known before that evening  
 14 or — I'd certainly found out before the end of the  
 15 evening because I've actually written it in my book.  
 16 Q. Shall we remove that from the equation? In your mind,  
 17 Ms Buckle, as you were having this discussion with  
 18 Mr Dexter, it's a decision that he took, you've told us  
 19 that, but did it seem a sensible, logical decision?  
 20 A. It did, yes.  
 21 Q. And why?  
 22 A. I believe that he was closer to the incident than I was  
 23 and would therefore arrive earlier.  
 24 Q. And in terms of his experience, and putting the  
 25 specialist role to one side?

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1 A. I don't know when he did his course, whether it would  
 2 have been — quite a similar time I suspect. I don't  
 3 know.  
 4 Q. All right. We know that he arrived at the station at  
 5 23.23.  
 6 A. Yes.  
 7 Q. And the time at which you arrived is obviously — would  
 8 have arrived is a matter of pure speculation.  
 9 A. It is. It would have been a little bit earlier.  
 10 Q. The conversation that you had with Superintendent Craig  
 11 Thompson, someone who you knew on the night at the time  
 12 of this conversation was a specialist TFC, the decision  
 13 that he made and the reasons, as you understood them,  
 14 sensible and logical?  
 15 A. Absolutely.  
 16 Q. And why?  
 17 A. Because he had more experience, more qualification, than  
 18 I did. Simple as that.  
 19 SIR JOHN SAUNDERS: Can I just clarify? I well understand  
 20 you might take his advice on it, but is it actually his  
 21 decision or your decision as advised by him?  
 22 A. It's my decision, but as advised by him, yes, sir.  
 23 SIR JOHN SAUNDERS: Thank you.  
 24 MR HORWELL: And knowing that there would therefore be  
 25 a delay, you would have been able to take over at an

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1 earlier stage as TFC than he would, but knowing that  
 2 there would be a delay, obviously not knowing what that  
 3 delay would be but having an idea, did you think it  
 4 worth the delay for the advantages that he would bring  
 5 to that role?  
 6 A. I did. I did believe it would be an advantage for him  
 7 to become the TFC. I didn't realise how long it would  
 8 take him to arrive and take over.  
 9 SIR JOHN SAUNDERS: Okay, sorry, just so we give you  
 10 absolute clarity on this. There are two factors here.  
 11 First of all, just how overwhelmed is the duty officer,  
 12 force duty officer.  
 13 A. Yes.  
 14 SIR JOHN SAUNDERS: Because that would be relevant to your  
 15 decision, wouldn't it, as to whether you should take  
 16 over rather than have a delay?  
 17 A. Yes.  
 18 SIR JOHN SAUNDERS: But it's got to be a bit, hasn't it.  
 19 A. Yes.  
 20 SIR JOHN SAUNDERS: If he's really not coping, the sooner  
 21 someone else takes over, the better?  
 22 A. I didn't think Dale wouldn't be coping. He was a very  
 23 competent force duty officer.  
 24 SIR JOHN SAUNDERS: Your impression at the time was (a) he  
 25 is very competent so he would cope and (b) you thought

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1 he was coping?  
 2 A. Yes, sir.  
 3 SIR JOHN SAUNDERS: And he never said to you, "I'm not  
 4 coping"?  
 5 A. No.  
 6 SIR JOHN SAUNDERS: And the other factor which you need to  
 7 know is just how long you are going to have to wait  
 8 before the other officer comes, which is something you  
 9 really probably should have known but didn't?  
 10 A. I certainly expected him earlier than he did arrive.  
 11 SIR JOHN SAUNDERS: Okay.  
 12 MR HORWELL: Can I just follow up on one of the answers you  
 13 gave. You did not think that Dale would not be coping?  
 14 A. I knew he'd be busy.  
 15 Q. Yes. There's a massive difference between the two.  
 16 A. I didn't consider that Dale wouldn't cope, wasn't  
 17 coping.  
 18 Q. Can you help the chairman as to why?  
 19 A. He was a very competent force duty officer. In my  
 20 experience, he's always been extremely professional and  
 21 had coped with everything that I've had contact with him  
 22 about before. I had no reason to think he wouldn't be  
 23 being able to manage things.  
 24 Q. Did you ever for one moment imagine that for whatever  
 25 reason — let's not become involved in the reason or

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1 reasons -- but did you ever imagine for one moment that  
 2 for whatever reason the FDO would not have informed fire  
 3 and ambulance that Plato had been declared?  
 4 A. No, it was not in my mind at all.  
 5 Q. In terms of the knowledge that you had from the scene,  
 6 you were aware that casualties were being evacuated?  
 7 A. From reading the FWIN, yes.  
 8 Q. And because casualties were being evacuated -- and the  
 9 last casualty to be evacuated from the City Room was at  
 10 23.39 that evening -- because casualties were being  
 11 evacuated from the City Room, did you consider that  
 12 there was a problem with zones? Forgetting for the  
 13 moment the precise nature of zones and where they might  
 14 have been, because the casualties were being evacuated,  
 15 did you consider that there was a problem with the  
 16 zones?  
 17 A. Not really, no, sir, because... No, I can't really add  
 18 very much more, sorry.  
 19 Q. In terms of the questions you were asked about command  
 20 structures at the scene and what you said about the  
 21 GATFC, and you were asked these questions on the basis  
 22 of imagining if you had gone to the scene as at one  
 23 stage you had envisaged, if there had been two  
 24 experienced and highly competent inspectors as  
 25 Bronze commanders at the scene, one for the inner scene,

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1 one for the outer, would that have been sufficient in  
 2 your view?  
 3 A. I know that JESIP expects a tactical commander, which is  
 4 the Silver. The practicalities of that are sometimes  
 5 more challenging. It might have been enough had they  
 6 been utilised for that purpose though.  
 7 Q. This is all speculation, as you can well understand, but  
 8 as GATFC if you had considered that there was in fact  
 9 a command vacuum, a need for a further commander, you no  
 10 doubt would have asked the FDO?  
 11 A. Yes, I'd expect so.  
 12 Q. Thank you.  
 13 SIR JOHN SAUNDERS: Just before you leave that, so you're  
 14 trained as a Silver commander?  
 15 A. I am, sir.  
 16 SIR JOHN SAUNDERS: So what is your understanding, trained  
 17 as a Silver commander, whether you should go to the  
 18 scene or whether you should stay at headquarters or  
 19 a remote location, or is this a matter of doubt,  
 20 depending on the situation?  
 21 A. It's always a topic of conversation.  
 22 SIR JOHN SAUNDERS: So this is something which is simply not  
 23 decided particularly by GMP?  
 24 A. GMP Silver commander -- because of all pre-planned  
 25 events, the GMP Silver commander tends to be in the

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1 Silver control room at the force HQ, which probably  
 2 leads to some confusion of the necessity for  
 3 a Silver commander at the incident itself.  
 4 SIR JOHN SAUNDERS: So if you have a spontaneous incident,  
 5 what is the position about where the Silver commander  
 6 goes?  
 7 A. JESIP says they will go to the scene.  
 8 SIR JOHN SAUNDERS: And GMP says?  
 9 A. I'm not sure if GMP says anything.  
 10 SIR JOHN SAUNDERS: Okay. Right.  
 11 MR HORWELL: But if the scene is a marauding terrorist  
 12 firearms attack, there have --  
 13 A. There may not be a best location for --  
 14 Q. Well, that's the question I was going to ask. There are  
 15 obviously advantages for the Silver commander being at  
 16 force headquarters.  
 17 A. Yes.  
 18 Q. With all of the --  
 19 A. Absolutely, sir.  
 20 Q. -- many advantages that that location offers.  
 21 A. Yes, I completely agree.  
 22 Q. Thank you.  
 23 SIR JOHN SAUNDERS: A matter of debate, as you rightly said,  
 24 and we've just had it.  
 25 MR HORWELL: And it will continue, I have no doubt, sir.

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1 That's all I ask Ms Buckle.  
 2 MR DE LA POER: Sir, unless you have any further questions,  
 3 that concludes the --  
 4 SIR JOHN SAUNDERS: No, I don't.  
 5 I'm very grateful. I'm sure coming back out of  
 6 retirement to have to face this not the greatest thing  
 7 to have to do, but thank you very much for the help  
 8 you've given.  
 9 A. Thank you, sir.  
 10 MR COOPER: Sir, if there's any way the phone can be  
 11 retrieved, if it's still in the custody -- I know it's  
 12 a hope.  
 13 SIR JOHN SAUNDERS: It would be very nice to know who Neil  
 14 was, I quite agree, so any way of finding him would be  
 15 a help. Thank you.  
 16 Timetabling  
 17 MR DE LA POER: Sir, I wonder if I can just impose upon  
 18 Ms Buckle for a moment or two longer while I give you  
 19 and everyone listening an update about tomorrow.  
 20 The plan is as follows: that we will commence  
 21 tomorrow with PC Richardson rather than continuing with  
 22 what we had planned to do, which was PC Lawton, who was  
 23 our next witness. So far as PC Richardson is concerned,  
 24 his evidence is subject to a restriction order and only  
 25 those present in the hearing room will be able to see

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1 him and no image or description of him can be published  
 2 by reason of that restriction order.  
 3 Once PC Richardson's evidence is concluded, we will  
 4 turn to PC Lawton to complete his evidence, we hope, and  
 5 if there's time we will make a start on PC Moore's  
 6 evidence.

7 SIR JOHN SAUNDERS: Right. I think the restriction order  
 8 has been varied in relation to the press because of  
 9 later decisions by other courts?

10 MR DE LA POER: Yes, that's correct.

11 SIR JOHN SAUNDERS: They know what that variation is, that's  
 12 fine.

13 We're sitting at 9.30 tomorrow. Can I give this  
 14 advance warning: because of a commitment I have, I'm  
 15 afraid that on Wednesday, we can't sit beyond 3.45. So  
 16 if that's an early day, you're getting one on Wednesday.

17 Thank you.

18 (4.47 pm)

19 (The inquiry adjourned until 9.30 am  
 20 on Tuesday, 11 May 2021)

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 24  
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