

OPUS2

Manchester Arena Inquiry

Day 101

May 11, 2021

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Tuesday, 11 May 2021

1 (9.30 am)

(Delay in proceedings)

2 (9.43 am)

3 MR GREANEY: Sir, good morning. The gentleman in the
4 witness box is Edward Richardson, and as Mr de la Poer
5 mentioned yesterday, this evidence is the subject of
6 a restriction order. All concerned, including the
7 media, are aware of the terms of the restriction order,
8 but it is relevant to read out just three paragraphs so
9 that there is no doubt about it.

10 Paragraph 2 reads:

11 "The image of PC Edward Richardson shall not be
12 broadcast by the inquiry and will be withheld from the
13 publicly available live stream, whether delayed or
14 otherwise, of his evidence."

15 Paragraph 3:

16 "This order prohibits the broadcast of the image of
17 PC Edward Richardson on the BlueJeans video platform
18 used by the inquiry and on the live stream broadcast to
19 the inquiry's media annex, the annexes at the
20 Magistrates' Court and on YouTube."

21 And on paragraph 4:

22 "There shall be no publication of the image of
23 PC Edward Richardson or reporting of any details which

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1 may lead to his identification by the media pursuant to
2 section 11 of the Contempt of Court Act 1981."

3 Sir, can we indicate we're most grateful for the
4 realistic and cooperative approach that all concerned
5 have taken to this issue.

6 SIR JOHN SAUNDERS: Mr Richardson, you're aware of the
7 effect of that, are you?

8 A. Yes, sir.

9 SIR JOHN SAUNDERS: Thank you.

10 MR GREANEY: Could Mr Richardson please now be sworn.

11 PC EDWARD RICHARDSON (affirmed)

12 Questions from MR GREANEY

13 MR GREANEY: Can you tell us your full name?

14 A. Edward Richardson.

15 Q. Mr Richardson, are you a police constable with
16 Merseyside Police?

17 A. Yes.

18 Q. Are you an authorised firearms officer?

19 A. Yes.

20 Q. And in addition, are you accredited as an operational
21 firearms commander, or OFC, and as a specialist firearms
22 officer or SFO?

23 A. Yes.

24 Q. On the night of the arena attack, did you enter the
25 arena complex shortly after 22.40 hours and so about

2

1 10 minutes after the explosion had occurred?

2 A. Yes.

3 Q. Did you perform the role of OFC within those premises
4 over the course of the golden hour and indeed well
5 beyond that?

6 A. Yes.

7 Q. As you'll appreciate, we're going to get into that in
8 some detail but before that I'm going to ask you about
9 your background and professional experience.

10 Did you join Merseyside Police in June 2003, having
11 spent 8 years in the British Army?

12 A. Yes.

13 Q. Initially, were you a uniformed constable on the
14 F Division of Merseyside Police?

15 A. Yes.

16 Q. Which division covers, among other areas, Toxteth?

17 A. Yes.

18 Q. Did you, in simple terms, perform a uniformed police
19 role during that period on neighbourhood or response
20 duties?

21 A. Yes.

22 Q. In October of 2006, did you commence training to become
23 an authorised firearms officer?

24 A. Yes.

25 Q. The training for that post comprised of what, please?

3

1 A. Weapons handling, foot tactics and vehicle tactics.

2 Q. Did the course last for a full 7 weeks at various
3 locations that we don't need to go into?

4 A. Yes.

5 Q. Following completion of the course, after a short period
6 of waiting for a vacancy, were you posted in March 2007
7 to Smithdown Lane Police Station in Liverpool as an AFO?

8 A. Yes.

9 Q. For a period, were you mentored by a senior member of
10 the firearms team?

11 A. Yes.

12 Q. And generally, would that mentoring last for a period of
13 6 months whilst the mentee experienced sufficient
14 real-life incidents, but in your case, because of the
15 number of incidents you dealt with, it took 3 to
16 4 months?

17 A. Yes.

18 Q. Having held the role of AFO for a period of time, in
19 2008 did you train successfully to perform the role of
20 operational firearms commander?

21 A. Yes.

22 Q. To your mind, is the role of the OFC to act as a ground
23 commander for the armed resources attending an incident?

24 A. Yes.

25 Q. Is that an important distinction to draw, the role of

4

1 OFC is to command the armed resources, leaving it to
 2 another commander to command the unarmed resources?
 3 A. Yes.
 4 Q. At the scene of an incident, is it the responsibility of
 5 the OFC to formulate a response?
 6 A. Yes.
 7 Q. Based around the training and tactics and intelligence
 8 and information received from what in Greater Manchester
 9 Police is known as the FDO?
 10 A. Yes.
 11 Q. And in your home force as the FIM or force incident
 12 manager?
 13 A. Yes.
 14 Q. Would you expect that response in the event of a Plato
 15 incident to involve the OFC deciding where the zones
 16 were?
 17 A. Have an involvement with regards to what he sees on the
 18 ground --- and basically the eyes and ears, but the
 19 FDO --- so, yes.
 20 Q. We're going to come on to this in more detail, but in
 21 a --- just dealing with things in the abstract rather
 22 than focusing in on the 22nd for the moment, in general
 23 terms in a Plato incident, whose job would you expect it
 24 to be to designate the hot, warm and cold zones because
 25 obviously that's a decision that needs to be made,

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1 am I right, at an early stage?
 2 A. Yes. It can be conducted by the OFC, but also it would
 3 be the ground TFC who would also confirm the zones as
 4 well.
 5 Q. So it might be the OFC, it might be the ground--assigned
 6 tactical firearms commander?
 7 A. Yes.
 8 Q. And what particular circumstance or circumstances would
 9 dictate which of those persons it was, first on the
 10 scene?
 11 A. The first on the scene would be the OFC with the
 12 firearms team. They can gather the intelligence or the
 13 picture of what they're seeing and dealing with and they
 14 would relay that back to Silver command, which is the
 15 FDO.
 16 Q. So in the circumstances of this case, jumping ahead just
 17 slightly, we know that you were at the scene really very
 18 quickly indeed.
 19 A. Yes.
 20 Q. We know that the ground--assigned tactical firearms
 21 commander, Mr Dexter, arrived considerably later; he
 22 arrived outside at 11.23. In the situation with which
 23 you were confronted on the night of the 22nd, whose job
 24 was it to designate zones?
 25 A. I took it as the role of myself initially because there

6

1 was no further command structure on the ground at that
 2 time.
 3 Q. As I said, we'll get into that in further detail, but
 4 it's just useful to have that in mind.
 5 SIR JOHN SAUNDERS: You mentioned the FDO doing it as well
 6 possibly, you reporting back to the FDO, how realistic
 7 is it for the FDO to do it when he is actually not
 8 there?
 9 A. It's with the information, sir, that I'm giving him or
 10 an OFC would be giving the FDO and they predominantly
 11 would have a folder with a plan of certain venues and
 12 they can sort of orchestrate where they believe with the
 13 information that they're receiving from the firearms
 14 team or the FDO ---
 15 SIR JOHN SAUNDERS: In relation to this, provided the FDO
 16 had a plan of the arena which he could look at, then he
 17 could translate the information that you are saying and
 18 then tell you where the zones should be?
 19 A. Yes, it could be done.
 20 SIR JOHN SAUNDERS: Thank you.
 21 MR GREANEY: This environment was not a straightforward one,
 22 was it?
 23 A. No.
 24 Q. You had the railway station, the overbridge, the
 25 City Room and the arena. But what you would --- I think

7

1 what you're saying to us --- hope and expect is that the
 2 FDO in the OCR would have a plan of the area. You are
 3 his eyes and ears, you're there very quickly, you give
 4 him situational awareness, and he is able to look at the
 5 plan and say, "That's hot, that's warm and that's cold".
 6 I don't think it proved to be so straightforward on the
 7 night of the arena attack, did it?
 8 A. No.
 9 Q. In your witness statement at paragraph 7, you list what
 10 is called the role profile for an OFC. I believe, and
 11 I intend no criticism in putting it this way, that
 12 that is a lift from a document entitled "Armed Command";
 13 is that right?
 14 A. Yes.
 15 Q. Which is a document prepared by the College of Policing?
 16 A. Yes.
 17 Q. And I can say, and you'll confirm if I've got it wrong,
 18 that that is a professional body for policing with
 19 a training and development role.
 20 A. Yes.
 21 Q. And you've been asked to have a look at that document,
 22 just to refresh your memory from it this morning. I'm
 23 going to put just a few pages on the screen, not really
 24 to ask you any detailed questions about it, just so it's
 25 out there. We did look at one page in Mr Weatherby's

8

1 questioning of Mr Sexton.
 2 Mr Lopez, this is {INQ004140/1}.
 3 It's obviously a print from the internet. We learn
 4 from the bottom that this is the content as of
 5 22 May 2017. As I have said, it is headed, "Armed
 6 Policing Command".
 7 Over the page, {INQ004140/2}:
 8 "Command. This module details the command structure
 9 and supporting measures appropriate to the deployment of
 10 authorised firearms officers."
 11 Then "Command structure" at the bottom. There are
 12 obviously a number of hyperlinks.
 13 {INQ004140/3}:
 14 "The generic command structure used in the UK police
 15 service operates at three levels: strategic/Gold,
 16 tactical/Silver and operational/Bronze.
 17 "Firearms operations often form one part of a more
 18 complex, multi-faceted operation that will already be
 19 using Gold/Silver/Bronze command descriptors."
 20 Which was the position on the night of the 22nd:
 21 "It is therefore important to define the command of
 22 the firearms element through the use of functional
 23 descriptors. The descriptors used throughout this
 24 module are: strategic firearms commander..."
 25 On the night did you understand that was ACC Ford?

1 A. I wasn't fully aware who the SFC was, being relatively
 2 new to the force, but I knew there would be one in
 3 place.
 4 Q. On the night you didn't know who the SFC was but you
 5 knew that there would be one?
 6 A. Yes.
 7 Q. "... determines the strategic objectives and sets any
 8 tactical parameters, retains strategic oversight and
 9 overall command and responsibility."
 10 That's the Gold or strategic firearms commander.
 11 Then:
 12 "Tactical firearms commander. Develops, commands
 13 and coordinates the overall tactical response in
 14 accordance with the strategic objectives."
 15 And initially, were you aware that the FDO,
 16 Mr Sexton, was the tactical firearms commander?
 17 A. Yes.
 18 Q. In due course that role came to be shared between the
 19 ground-assigned tactical firearms commander, Mr Dexter,
 20 and Mr Hill, the tactical firearms commander at Silver?
 21 A. Yes.
 22 Q. Then the role that you were to assume --
 23 SIR JOHN SAUNDERS: Mr Hill?
 24 MR GREANEY: Mr Thompson, you're quite right, sir.
 25 Thank you for putting me right.

1 And the role that you were to perform:
 2 "Operational firearms commander. Commands a group
 3 of officers carrying out functional or territorial
 4 responsibilities related to a tactical plan."
 5 Under the heading "Command roles and functions":
 6 "The command structure offers flexibility in
 7 response to a varied and developing range of
 8 circumstances and is functional rather than based on
 9 rank."
 10 Which is, we have heard before, about roles not
 11 rank?
 12 A. Yes.
 13 Q. Over the page {INQ004140/4}, what you describe as the
 14 role profile for strategic firearms commander is given.
 15 We'll ask ACC Ford about that when she comes.
 16 Over the page {INQ004140/5}, tactical firearms
 17 commander, the role profile. Again, we'll seek the
 18 assistance of Mr Dexter when he gives his evidence.
 19 At the bottom of page 5 over to page 6
 20 {INQ004140/5-6}, we've got back to the issue you were
 21 dealing with in your witness statement, the role profile
 22 of an OFC.
 23 You've gone too quickly to page 6, Mr Lopez. Could
 24 we have the bottom of page 5, please, and follow this
 25 through?

1 "The OFC must have knowledge and clear understanding
 2 of their role and the overall aim of the operation."
 3 A. Yes.
 4 Q. And were you aware of that responsibility on the night
 5 of the 22nd?
 6 A. Yes.
 7 Q. "Must, where practicable, ensure that their staff are
 8 appropriately briefed."
 9 Again, were you aware of that responsibility?
 10 A. Yes.
 11 Q. "Should be located where they are able to maintain
 12 effective command of their area of responsibility."
 13 On the night, you were within the arena complex and
 14 for a prolonged period within the City Room itself?
 15 A. Yes.
 16 Q. "Ensures the implementation of the tactical firearms
 17 commander's tactical plan within their territorial or
 18 functional area of responsibility."
 19 Did you receive a tactical plan from Mr Sexton?
 20 A. I didn't, no.
 21 Q. Should you have done?
 22 A. Yes.
 23 Q. "Updates the tactical firearms commander as appropriate
 24 on current developments."
 25 And as we're going to see, you regularly gave

1 situation reports or updates to the FDO, did you not?
 2 A. Yes.
 3 Q. "Makes decisions within their agreed level of
 4 responsibility , including seeking approval for any
 5 variation in agreed tactics within their area of
 6 responsibility ."
 7 Did you understand that that was one of your
 8 responsibilities that night?
 9 A. Yes.
 10 Q. "Must ensure clear communication channels exist between
 11 themselves, tactical firearms commander and those under
 12 their command."
 13 Were you aware that that was one of your
 14 responsibilities ?
 15 A. Yes.
 16 Q. "Should consider declaring and managing the event as
 17 a critical incident ."
 18 Were you aware that that was one of your
 19 responsibilities ?
 20 A. Yes.
 21 Q. And we have in fact heard that term, critical incident ,
 22 a little earlier in the case, but we haven't had
 23 a definition of it. Is a critical incident the same as
 24 or different from a major incident?
 25 A. I would say slightly increased, critical incident, due

1 to the casualty — potential of casualties.
 2 Q. So as you understood it, if I have understood it
 3 correctly, a critical incident is or is likely to be
 4 a major incident but one involving casualties?
 5 A. Yes.
 6 Q. That night did you personally declare a major incident?
 7 A. I gave the information to the FDO of what I was seeing
 8 and without going through — saying the words "critical
 9 incident", it was quite clear what I was explaining
 10 would have been interpreted as a critical incident .
 11 Q. If I've understood the point you're making, you were
 12 describing — and obviously we must be careful with our
 13 language — but you were to describe a situation of
 14 devastation that confronted you in the City Room?
 15 A. Yes.
 16 Q. And you understood that the FDO would realise from that
 17 that you were describing a critical incident and also
 18 a major incident?
 19 A. Yes.
 20 Q. "Should be available to those under their command.
 21 However, they should allow them sufficient independence
 22 to carry out their specific role in accordance with the
 23 strategy and tactical plan."
 24 Were you aware that that was one of your
 25 responsibilities ?

1 A. Yes.
 2 Q. Indeed, as we're going to see, did you liaise
 3 extensively with your staff that night?
 4 A. Yes.
 5 Q. Both in person and over the radio?
 6 A. Yes.
 7 Q. "Should ensure decisions taken are recorded where
 8 possible to provide a clear audit trail ."
 9 Was it possible or practicable to record decisions
 10 on the night of the 22nd?
 11 A. No.
 12 Q. But did you understand that what you were saying over
 13 the radio would be recorded and available for review?
 14 A. Yes.
 15 Q. Were you aware when Mr Dexter arrived that he was
 16 recording the events around him on a dictaphone?
 17 A. Not fully, but I knew it was something that was being
 18 looked at.
 19 SIR JOHN SAUNDERS: Just before we go on, you were saying
 20 that you would expect to be given a tactical plan and
 21 you didn't get one from the FDO. Just give us some idea
 22 of what you'd expect in the sort of situation in the
 23 arena. What would constitute a tactical plan that the
 24 FDO would give you?
 25 A. Sir, can I just refer to some documentation which

1 I have?
 2 SIR JOHN SAUNDERS: Yes.
 3 MR GREANEY: Can you tell us what you're looking at?
 4 A. It's basically an ITFC briefing sheet, which basically
 5 on the night in question was slightly different to what
 6 we have now. It's an adapted —
 7 Q. Is this something that's within the evidence proposal
 8 pack that you've been provided with or is this something
 9 that you've brought as a result of your own work?
 10 A. It should be within the evidence proposal pack, but I've
 11 also got this, which I believe has been — more copies
 12 have been made available.
 13 Q. I'm sure we'll have it, I don't have it immediately to
 14 hand, but you please explain to us what you want to
 15 explain about a tactical plan.
 16 A. On deployment of armed officers there will be
 17 a nominated OFC from the FDO and one of how many OFCs
 18 were on duty on the night would nominate themselves,
 19 which was myself.
 20 With regards to the information being received from
 21 the FDO, he would make it clear that he was deploying
 22 armed officers with an authority to conduct an armed
 23 tactic. I would make a recording of information and
 24 intelligence and I would write that down freehand and
 25 I would also make notes of what resources, call signs,

1 I had readily available to me to implement whatever
 2 tactic it was that the FDO was authorising.
 3 There's a thing called VLS, which is victims,
 4 obvious and potential, the location and subject, and
 5 that follows on from the identity, which is the same as
 6 the subject, capability and intention.
 7 So VLS and ICI is -- victim is basically members of
 8 the public in the close proximity of the arena and
 9 within the arena. The location is the MEN Arena, which
 10 is all we got given that night. Subject would be
 11 unknown. Capability, on this occasion, was an explosion
 12 and shots being fired. The intention is basically
 13 terrorism, murder, criminality. All that would be
 14 recorded on the first piece of paper.
 15 SIR JOHN SAUNDERS: By you?
 16 A. That would be given to me by the Silver, by the ITFC, he
 17 would have something very similar to this and I would
 18 make a handwritten recording of the relevant
 19 information, which has been said to me over the air
 20 whilst I'm en route to the location in question.
 21 SIR JOHN SAUNDERS: In this situation he can't give it to
 22 you because he's somewhere else?
 23 A. It's over the air, sir, over the radio channel.
 24 SIR JOHN SAUNDERS: Do you have that piece of paper with
 25 you?

17

1 A. I have this with me all the time, every time I'm
 2 operational.
 3 SIR JOHN SAUNDERS: So you're going through a checklist as
 4 it were?
 5 A. I'm recording the information basically that the ITFC is
 6 giving me.
 7 SIR JOHN SAUNDERS: And this didn't happen?
 8 A. No. Understandably, due to the circumstances, but, no,
 9 not initially on the -- basically going to the scene.
 10 SIR JOHN SAUNDERS: Right. Was the tactical plan in that?
 11 A. Basically the second page, he will go through transfer
 12 of malice, which has slightly changed now. That's
 13 basically on a point of contact if any sort of threat
 14 will be presented to the police officers or members of
 15 the public on point of contact with the subject.
 16 MR GREANEY: Can I ask you to pause for one moment?
 17 SIR JOHN SAUNDERS: Obviously, I have never seen this
 18 document before.
 19 MR GREANEY: I don't believe I have either. I'm not
 20 criticising anyone for that, but I'm very keen that the
 21 transcript, which is there for all time --
 22 SIR JOHN SAUNDERS: Should be intelligible.
 23 MR GREANEY: Yes.
 24 What you have provided to us is a document entitled
 25 "Constable 1549 OFC."

18

1 Who is that?
 2 A. That's myself. That's what collar number I go by now
 3 within Merseyside.
 4 Q. "For spontaneous deployment briefing activate BWC."
 5 Is that body-worn camera?
 6 A. Yes, which wasn't the case on the night.
 7 Q. And is this a document that was available to you on the
 8 night of the arena attack?
 9 A. A document similar to this. It's changed since then.
 10 But I did have documentation for recording relevant
 11 information for a deployment.
 12 Q. Is this a document that you have created or that someone
 13 else has created?
 14 A. I created this, as other OFCs do, in accordance with --
 15 that's expected of their training and accreditation.
 16 Q. Right. So you had, if not precisely this type of
 17 document, a similar document available on the night?
 18 A. Yes.
 19 Q. And what is the purpose of this document?
 20 A. An audit trail.
 21 Q. Did you complete such a document on the night of the
 22 arena attack?
 23 A. No.
 24 Q. Why was that?
 25 A. Because the information wasn't given.

19

1 Q. So you had this -- how do you describe this document?
 2 What's the term for it?
 3 A. An ITFC briefing form.
 4 Q. So you had a blank one of these available on that night
 5 but you weren't able to fill it in because you weren't
 6 provided with the relevant information?
 7 A. Yes.
 8 Q. The second page, I think you were telling us, is where
 9 you would record the tactical plan that you were given
 10 by the ITFC?
 11 A. The second page is basically threat assessment, the
 12 overall threat assessment of the incident you're being
 13 deployed to and the threat assessment and working
 14 strategy, which is basically what you're trying to
 15 achieve throughout the duration of the tactic that
 16 you're being authorised to implement.
 17 Q. So is the -- I'm going to be very careful about
 18 identifying exactly what is on this form in case any of
 19 it is operationally sensitive. Is the threat assessment
 20 something that you'd expect to receive from the ITFC,
 21 the FDO?
 22 A. Some if not all.
 23 Q. This form also has an area for you to record a working
 24 strategy.
 25 A. Yes.

20

1 Q. And what is -- it might be self-evident, but what is the
 2 working strategy?
 3 A. Basically, to save life, to protect the public, and
 4 it would go down in order of priority.
 5 Q. Is that something that you as the OFC would come up with
 6 or is that something that you would receive from the
 7 ITFC?
 8 A. I would receive it.
 9 Q. And then there is a heading "Powers and policies". Does
 10 that have anything to do with the tactical plan?
 11 A. It basically gives you the powers -- that you're
 12 implementing this tactic, so yes.
 13 Q. Again is that something you would expect to receive from
 14 the ITFC?
 15 A. Yes.
 16 Q. Then over the page, we have various other areas to input
 17 information, "tactical option" and "tactical
 18 parameters". Is that something that you would be
 19 expected, as OFC, to come up with yourself or to obtain
 20 from the ITFC?
 21 A. From the ITFC.
 22 SIR JOHN SAUNDERS: This looks like the tactical plan here;
 23 is that right?
 24 A. Yes.
 25 SIR JOHN SAUNDERS: Do you actually have time to do any of

1 this?
 2 A. Sometimes, depending on the close proximity of the
 3 firearms officers, you'll take in minimal information as
 4 in the ITFC will adapt his briefing for the timescale
 5 that he has got or he is allowed before we get to scene
 6 and implement a tactic. Myself would predominantly ask
 7 other patrols if they've heard and understood the
 8 information and intelligence, threat assessment, working
 9 strategy.
 10 SIR JOHN SAUNDERS: So this information you expect to get on
 11 your way to the scene really?
 12 A. Yes.
 13 SIR JOHN SAUNDERS: Thank you.
 14 MR GREANEY: As you told us, you didn't receive a tactical
 15 plan. Here we know, of course, that Operation Plato was
 16 declared, declared formally, at about 10.47, although it
 17 had been under consideration for a longer period of time
 18 and discussion over the radio. In those circumstances,
 19 Operation Plato having been declared, would you have
 20 expected to hear anything more in terms of a tactical
 21 plan other than Operation Plato?
 22 A. In hindsight, yes, but circumstances dictate.
 23 Q. Of course. Insofar as you can tell us without delving
 24 into areas that are operationally sensitive, what sort
 25 of information, in respect of the incident that you were

1 confronted with that night, would you have expected to
 2 have obtained by way of a tactical plan?
 3 A. The words that were uttered or were said over the radio
 4 was declaring an Operation Plato and authorising an
 5 emergency search. Due to the information prior to
 6 getting to scene, which I was aware of from a colleague
 7 and the FDO, I could sort of understand why further
 8 information wasn't given. But myself and colleagues
 9 I was with at that time were aware what basically the
 10 threat was and what we were entering the building for.
 11 Q. We're going to get to that. But you knew you were
 12 entering the building because of a terrorist threat?
 13 A. Yes.
 14 Q. We will, I am sure, come back to some of this. It is my
 15 fault, but what we were dealing with was your background
 16 and experience and you very helpfully explained to us
 17 what the role profile of an OFC is.
 18 I'm going to go back to your second statement,
 19 paragraph 8. Having become accredited as an OFC
 20 in October of 2008 did you additionally qualify as
 21 a specialist firearms officer, an SFO?
 22 A. Yes.
 23 Q. Are SFOs trained to a more advanced level than AFOs?
 24 A. Yes.
 25 Q. Receiving additional training in areas such as building

1 assault and specialist weapons usage?
 2 A. Yes.
 3 Q. Throughout your subsequent career, including your
 4 transfer to Greater Manchester Police that we'll discuss
 5 in due course, did you retain your accreditation as
 6 an AFO and OFC through regular refresher training
 7 courses?
 8 A. Yes.
 9 Q. Is the AFO training currently every fifth week?
 10 A. Yes.
 11 Q. And is OFC accreditation refreshed every 5 years?
 12 A. Yes.
 13 Q. In your witness statement at paragraph 9 you explain
 14 that your accreditation in respect of the SFO role
 15 lapsed, as you put it, briefly during your period with
 16 GMP and wasn't current in May of 2017. Two questions,
 17 please. First of all, what does "briefly lapsed" mean?
 18 For how long did you not hold that accreditation?
 19 A. Throughout the duration of transfer into GMP.
 20 Q. Which was what period?
 21 A. November 2016 until...
 22 Q. Late in 2017, I think, perhaps October.
 23 A. February/March 2018 when I went back to Merseyside.
 24 Q. The second question is: did your lack of that
 25 accreditation make any difference on the night of the

1 arena attack?
 2 A. No.
 3 Q. During your career as an AFO before the arena attack,
 4 had you been on literally hundreds of firearms
 5 deployments?
 6 A. Yes.
 7 Q. And had you regularly taken on the OFC role?
 8 A. Yes.
 9 Q. On those occasions did the relationship with the FDO or
 10 FIM involve you simply doing what you were told and
 11 adopting the tactic that you were given or was some
 12 different approach taken or sometimes taken by you?
 13 A. Sometimes recommendations would be given with regards to
 14 the information and it'd be a professional discussion,
 15 if time permitted, on the air with the FDO or FIM.
 16 Q. The way in which you put it in your statement,
 17 paragraph 10, is:
 18 "This has sometimes led to my questioning the FDO if
 19 I don't feel a tactic meets a working strategy and
 20 I felt another alternative tactic better met the working
 21 strategy."
 22 A. Yes.
 23 Q. So this isn't a situation in which you just do as
 24 you are told. You are after all the one who is there on
 25 the ground commanding the firearms officers. You can

25

1 see what's happening and if you feel a tactic isn't
 2 working, the expectation would be that in fact you would
 3 challenge that tactic?
 4 A. In a professional way, yes.
 5 Q. In a professional way, as you've said. Is it unusual
 6 for tactics to change during a live deployment?
 7 A. They can.
 8 Q. In terms of your history, in November 2016, as you have
 9 told us, did you transfer from Merseyside Police to
 10 Greater Manchester Police?
 11 A. Yes.
 12 Q. Was it the position that although you were quite happy
 13 within Merseyside Police, you transferred to GMP because
 14 you believed that there was an opportunity there for
 15 career development?
 16 A. Yes.
 17 Q. Although it's dealt with in your statement, I think
 18 there's probably good reason for not going into what you
 19 thought that career development path was.
 20 Once you were in Greater Manchester Police, did you
 21 retain your AFO and OFC status?
 22 A. Yes.
 23 Q. Were your day-to-day duties as a GMP officer those of an
 24 armed officer on an armed response vehicle?
 25 A. Yes.

26

1 Q. Did that position involve offering force-wide cover
 2 where the presence of firearms-trained officers was
 3 required at particular incidents?
 4 A. Yes.
 5 Q. In terms of your career history, I think the position
 6 is -- this is where I've got the date from -- in your
 7 statement, paragraph 13, you tell us:
 8 "I returned via transfer to Merseyside Police in
 9 October 2017."
 10 Because the career development you had hoped for had
 11 not developed in that way?
 12 A. Yes.
 13 Q. In the course of your training as an AFO, have you
 14 become familiar with the concepts that we know as JESIP?
 15 A. Yes.
 16 Q. How would you describe the principles in JESIP? What
 17 are they designed to achieve?
 18 A. Multi-agency interoperability, basically.
 19 Q. To your mind in May 2017, was multi-agency
 20 interoperability important?
 21 A. Yes.
 22 Q. Why?
 23 A. Due to the type of incident that it was. Firearms
 24 officers are there for a specific role: to take on any
 25 threat they perceive. Unfortunately, due to the numbers

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1 of casualties that we had there, it was impractical for
 2 firearms officers to be embroiled in dealing with the
 3 mass of casualties because they have another role to
 4 perform, to prevent further casualties throughout the
 5 duration of the deployment.
 6 It's the OFC's role to liaise via the radio to
 7 basically allow other units, other services, to come to
 8 scene to assist with the casualties that are in place,
 9 that are there at the time, and for extraction and
 10 treatment.
 11 Q. So you've brought the issue very much into the events of
 12 the night of the 22nd. I think what you're saying to us
 13 is that once you got into the City Room, you realised
 14 that there were people in urgent need of help?
 15 A. Yes.
 16 Q. Your role as a firearms officer was to neutralise any
 17 threat that was there?
 18 A. Yes.
 19 Q. Not to treat the casualties?
 20 A. Yes.
 21 Q. And so someone else needed to be there to do that job?
 22 A. Yes.
 23 Q. And that's one of the ways in which JESIP comes in,
 24 because something needed to be done in order to make
 25 sure that those people were treated; is that how you

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1 feel about it?
 2 A. Yes.
 3 Q. And I do know from your statement that not actually
 4 being able to treat people is something that you have
 5 struggled with?
 6 A. Yes.
 7 Q. In your statement, I am at paragraph 15, you describe
 8 one particular GMP training exercise in which you
 9 participated before the arena attack. Do you know what
 10 I'm talking about?
 11 A. Yes.
 12 Q. Did that training exercise involve a marauding terrorist
 13 attack --
 14 A. Yes.
 15 Q. -- scenario?
 16 A. Yes.
 17 Q. Was it a tabletop exercise or a live exercise?
 18 A. A live activation exercise.
 19 Q. It may be that I should know, but are you talking about
 20 Exercise Winchester Accord or about something different?
 21 A. Something different.
 22 Q. I don't think we need to know exactly which exercise
 23 was, someone else can establish it for me, but it may
 24 not be necessary because what you can confirm is that
 25 other agencies present during that exercise included the

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1 Ambulance Service, NWAS?
 2 A. Yes.
 3 Q. Including their Hazardous Area Response Team?
 4 A. I'm of the opinion they were there.
 5 Q. Have I understood correctly, you're saying that your
 6 recollection is that they were there, but you're not
 7 vouching 100% for that?
 8 A. Yes.
 9 Q. At all events, by May 2017, were you aware that North
 10 West Ambulance Service had a Hazardous Area Response
 11 Team?
 12 A. Yes.
 13 Q. Did you know that that team was a specialist team
 14 dedicated to providing medical care to patients in, as
 15 is obvious from the description, a hazardous
 16 environment?
 17 A. Yes.
 18 Q. Do you remember whether the Fire and Rescue Service,
 19 GMFRS, took part in that exercise?
 20 A. I don't think so.
 21 Q. But in any event, as of 22 May 2017, were you aware that
 22 GMFRS had its own MTFA capability, namely the SRT?
 23 A. I wasn't fully aware of that.
 24 Q. Back to that training exercise. Did the scenario
 25 simulate a terrorist attack?

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1 A. Yes.
 2 Q. And the multi-agency response in respect of it?
 3 A. Yes.
 4 Q. Did it therefore include cold, warm and hot zones?
 5 A. Yes.
 6 Q. So were you exercising a Plato scenario during that
 7 exercise?
 8 A. Yes.
 9 Q. In your witness statement you give definitions of the
 10 cold, warm and hot zones, and we'll put these on the
 11 screen because I've just got a few questions for you
 12 about them.
 13 Mr Lopez, just put it on the screen when you've got
 14 exactly the correct part, please, {INQ032362/5}. What
 15 I want on the screen, please, is just paragraph 16 and
 16 the whole of that paragraph.
 17 You were talking about this in the context of the
 18 exercise:
 19 "These zones can broadly be defined as: cold zone,
 20 all areas where there has been no terrorist activity and
 21 is unlikely to become exposed; warm zone, an area in
 22 which there is no terrorist activity or threat from
 23 terrorists, but it is an area which has recently
 24 experienced such activity and one which remains
 25 vulnerable to renewed activity; hot zone, an area where

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1 terrorists are located and... the area which is within
 2 the reach of the effects of terrorist activity, whether
 3 through the use of firearms or explosives."
 4 As we're going to see in a moment, those are not the
 5 definition of cold, warm and hot zone given in JOPs. So
 6 may I ask you, where, when you prepared this statement,
 7 did you get those definitions from that we see on the
 8 screen?
 9 A. This is documentation which has been given to us over
 10 a duration of time when Plato came into place, that we
 11 could declare where the activity from the police or the
 12 other emergency services could go to.
 13 Q. I understand what the purpose of zoning is and we're
 14 going to come on to that.
 15 A. Sorry.
 16 Q. It'll be my fault, don't be sorry. The particular
 17 language that you use in the statement, if you don't
 18 know, you must tell me, but you have used particular
 19 language to describe these zones. Let me be entirely
 20 clear where I'm going to. Obviously I want to know from
 21 you in due course where you considered the hot, cold and
 22 warm zones were within the arena complex and what you
 23 did about any view that you held about zones. As part
 24 of that, I want to understand what definitions you had
 25 in your mind about zones. So the first part is the

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1 definitions you give in your statement; do you know
 2 where those definitions come from?
 3 A. From previous training.
 4 SIR JOHN SAUNDERS: Did they come out of your head or did
 5 you look at a document?
 6 A. It's sort of explained throughout firearms training.
 7 SIR JOHN SAUNDERS: Yes, sorry. When it comes into your
 8 statement, no doubt you were having assistance preparing
 9 your statement, but those words you put in there, are
 10 they done from memory or are they done by looking at
 11 a document?
 12 A. From looking at a document previously.
 13 MR GREANEY: The only place that I have been able to find
 14 these particular definitions, and it's always possible
 15 that I've missed something, but I've come across these
 16 particular definitions in a Fire and Rescue Service
 17 document that is attended to the statement of Mr Dark.
 18 Do you think you have taken those descriptions from that
 19 document or from a police document?
 20 A. From a police document.
 21 Q. Well, I won't press you any further. Those have come
 22 from somewhere and we'll track them down in due course.
 23 SIR JOHN SAUNDERS: And where you found it, did it relate to
 24 Plato or some other thing?
 25 MR GREANEY: It did relate to Plato. So others can check,

1 the only place that I found this particular language
 2 used on the whole of our database was in a document
 3 headed "Emergency resolution 2". I believe it's a Fire
 4 and Rescue Service document. It's one of the exhibits
 5 to the statement of Mr Dark of the FBU, a witness called
 6 by Mr de la Poer.
 7 SIR JOHN SAUNDERS: Thank you.
 8 MR GREANEY: At all events, were you familiar with the
 9 zoning terms in — first of all, were you familiar with
 10 JOPs as of 22 May 2017?
 11 A. I'd had a brief input with regard to it.
 12 Q. Were you familiar with the way in which zones were
 13 described in JOPs?
 14 A. I can't say that I can 100% say it's from JOPs, but
 15 I know with regards to the zoning.
 16 Q. Okay. The language in JOPs is different from the
 17 language we've just looked at, so shall we look at what
 18 it says in JOPs and then you can tell us on the night
 19 what you thought a hot, warm and cold zone was?
 20 I'm going to put it on the screen. Don't worry
 21 about finding it in the bundle although it's there.
 22 It's {INQ008372/4}, Mr Lopez.
 23 This is the glossary, terms are defined in
 24 alphabetical order. So cold zone:
 25 "An area where it has been assessed that there is no

1 immediate threat to life."
 2 Hot zone:
 3 "Where the attackers are present and/or there is an
 4 immediate threat to life."
 5 I think you probably saw Mr Sexton asked questions
 6 about that last week?
 7 A. Yes.
 8 Q. And then we need to go over the page to {INQ008372/5} to
 9 W for "warm zone":
 10 "Where the attackers are believed to have passed
 11 through but could enter/re-enter imminently. These
 12 areas cannot be guaranteed as safe."
 13 So the language used in the definitions in your
 14 statement and in JOPs, the language certainly isn't the
 15 same and it may be that the terms are capable of
 16 describing different things.
 17 On the night of the attack, once you knew that Plato
 18 had been declared, did you on the ground consider
 19 zoning?
 20 A. Not initially.
 21 Q. Did there come a time when you considered zoning?
 22 A. Yes.
 23 Q. I don't want to put words in your mouth, but was that
 24 after you had done your sweep of the City Room and at
 25 about the time that you gave an update, a further

1 update, to the FDO?
 2 A. Yes.
 3 Q. At the time you were considering zoning, which of the
 4 definitions of the various zones did you have in mind or
 5 did you have something different or more general in
 6 mind?
 7 A. Can you repeat the question, please?
 8 Q. Yes, of course. We've seen different definitions now of
 9 hot, warm and cold zone, so the definitions in your
 10 statement, which certainly are within an FRS document
 11 and we've seen the definition in JOPs, which I'm going
 12 to suggest should have been informing your
 13 decision-making and the decision-making of others. Did
 14 you have one set of definitions in mind just before
 15 10.48 when you were considering zoning or did you have
 16 some different definition of zones in mind or did
 17 you have in mind just some general idea of about what
 18 hot, warm and cold zones were?
 19 A. It was a general idea of what the zones were to be.
 20 Q. I'm going to come on to ask you a little more about that
 21 when we reach about 22.46 to 22.48 in your account, once
 22 you're doing your sweep.
 23 I want to be clear, I'm not criticising you when
 24 I ask you these questions. Someone should have made
 25 sure that you knew what the correct definition of these

1 zones was, because, after all, you were going to be the
 2 one at the sharp end if there was an Operation Plato
 3 declared, were you not?
 4 A. Yes.
 5 Q. I was dealing with the exercise that you attended in
 6 2017 that NWS also attended.
 7 SIR JOHN SAUNDERS: I know we don't know precisely which it
 8 was, but have we heard of an exercise in early 2017
 9 involving the Ambulance Service and the police?
 10 MR GREANEY: I'm not sure, sir.
 11 SIR JOHN SAUNDERS: Okay.
 12 MR GREANEY: Probably I ought to know the answer to that
 13 question.
 14 SIR JOHN SAUNDERS: No, no.
 15 MR GREANEY: I'm sure someone behind the scenes is finding
 16 out. I can't think that Mr de la Poer is doing anything
 17 else at the moment, so I'm sure he'll have an answer for
 18 me in the break.
 19 SIR JOHN SAUNDERS: Speaking on his behalf, I think that's
 20 probably an unfair comment!
 21 MR GREANEY: I hope so!
 22 There was an exercise on 14 January 2017,
 23 exercise -- ah, yes -- [REDACTED]
 24 Does that ring any bells?
 25 A. No.

1 SIR JOHN SAUNDERS: Perhaps you never got told the name of
 2 the exercise (overspeaking) don't say anything you think
 3 you shouldn't say.
 4 MR GREANEY: I'll try to be a bit better informed when we
 5 return after the break, sir.
 6 The exercise, [REDACTED] or whatever exercise it was, did
 7 you have an expectation when you went into that exercise
 8 that the HART team of NWS -- that HART would follow up
 9 the police armed contingency to deal with patients in
 10 any warm zone?
 11 A. Yes.
 12 Q. Is that how it panned out during the exercise as you
 13 recall it?
 14 A. To my recollection, no.
 15 Q. How did things pan out?
 16 A. The firearms team were confronting what was the threat
 17 during this training exercise. They, the firearms
 18 teams, were going through the building and trying to
 19 promote the ambulance response or paramedic response to
 20 come into an area where we believed was not the hot
 21 zone. That did not take place.
 22 Q. So the police were trying to encourage ambulance
 23 resources into a warm zone and it wasn't happening?
 24 A. To my recollection, no.
 25 Q. Did that, potentially at least, leave a situation of

1 casualties being unattended in a warm zone?
 2 A. If we had casualties there at that time, because we
 3 didn't have people playing the casualties, but it would
 4 have left them not being treated if they were there.
 5 Q. Did you take away from that exercise that there had been
 6 a lack of effective communication between the emergency
 7 services that participated?
 8 A. Yes.
 9 Q. Was there subsequently a debrief?
 10 A. Yes.
 11 Q. Was that lack of effective communication highlighted on
 12 the debrief?
 13 A. Yes.
 14 SIR JOHN SAUNDERS: You may have told us, but were you the
 15 OFC for this exercise?
 16 A. No, sir.
 17 MR GREANEY: You were just one of the AFOs?
 18 A. Yes.
 19 Q. And do you know whether any lessons learned from that
 20 exercise and the debrief led to change?
 21 A. It was a conversation point at the end, which due to
 22 being relatively new to the force I didn't get overly
 23 involved with. I observed and listened. But the points
 24 were addressed and the general opinion was that medical
 25 response would attend when their command structure

1 informed them to go in rather than when the police
 2 informed them to go in.
 3 Q. One of a number of things that I'm going to come on to
 4 is how this all developed on the night in terms of
 5 attendance by paramedics into the City Room, because you
 6 were within that room, were you not, for a prolonged
 7 period?
 8 A. Yes.
 9 Q. Between about 22.46 and about 23.30, I think, and you'll
 10 be able to help us with how it was in there.
 11 I've mentioned a number of times Operation Plato.
 12 Before 22 May 2017, were you aware of Operation Plato?
 13 A. Yes.
 14 Q. Did you have in your view a good understanding of what
 15 it involved?
 16 A. Yes.
 17 Q. Had you received training in it before the arena attack?
 18 A. Yes.
 19 SIR JOHN SAUNDERS: He has just told us about one bit.
 20 MR GREANEY: He did.
 21 In paragraph 18 of your statement you describe Plato
 22 in the following terms and I'm going to ask you whether
 23 you think this is an accurate description:
 24 "Plato [you say] is the codename for an operational
 25 emergency services response instigated upon a perceived

1 terrorist attack.”
 2 A. Yes.
 3 Q. Is that right, that Plato deals with a perceived
 4 terrorist attack, which would seem to involve any form
 5 of terrorist attack, or is it something that deals with
 6 something more specific than that?
 7 A. I think Plato, on that time, was referring to an MTFA.
 8 However, terrorist attacks are more than just an MTFA.
 9 Q. Of course they can be, yes, and were on this night or
 10 were different from.
 11 A. Yes. And that’s where — obviously with the information
 12 that we were being given from the FDO and he declared
 13 Plato.
 14 Q. Yes.
 15 A. And then the tactic he wanted to be authorised or
 16 implemented, should I say. It was a clear understanding
 17 from me and from the people who I was with at that time
 18 of what was expected and what we were looking to
 19 confront.
 20 Q. Let me ask you what is probably a better question, which
 21 is: on 22 May, did you believe that Plato was an
 22 operation that could and should be declared in the event
 23 of a terrorist attack, whatever form it took, or that it
 24 was an operation that should be declared only in
 25 response to an MTFA?

1 A. I was of the opinion at that time it was a terrorist
 2 attack.
 3 Q. That’s a very, if I may say so, fair response.
 4 Once called, were you aware on the night of the
 5 attack that it sets in motion a number of responses
 6 which are aimed at galvanising a number of emergency
 7 services?
 8 A. Yes.
 9 Q. Does the OFC have or may he or she have a role in the
 10 declaration of Operation Plato?
 11 A. Basically to coordinate the implementation of the tactic
 12 that’s authorised, the control measures of the firearms
 13 officers, and an understanding of the tactic that’s been
 14 authorised.
 15 Q. Let me just be clear in what I was driving at. The OFC
 16 is the person on the ground —
 17 A. Yes.
 18 Q. — necessarily? The person who is able to gain
 19 situational awareness?
 20 A. Yes.
 21 Q. And as you have put it, and indeed as Mr Sexton put it,
 22 the eyes and ears of the FDO?
 23 A. Yes.
 24 Q. So obviously, Operation Plato may be declared before the
 25 OFC actually gets to the scene or has gained situational

1 awareness. But if not, would you expect the OFC to be
 2 feeding in information to the FDO to enable him to make
 3 a decision about whether Plato is appropriate?
 4 A. Yes.
 5 Q. And moreover, once Plato has been declared, am I right
 6 that it is obvious that it shouldn’t remain in place for
 7 all time, there needs to come a point at which it comes
 8 to Plato standby, as it’s described here, or is just
 9 cancelled or withdrawn?
 10 A. That’s not a decision of the OFC.
 11 Q. I understand that. But as a matter of practicality,
 12 surely, and we have heard evidence about this, Plato
 13 needs to be kept under review and if it is no longer
 14 appropriate as a tactic, it needs to come to an end?
 15 A. Yes.
 16 Q. And as the eyes and ears of the ITFC, the FDO, does the
 17 OFC have a responsibility to ensure that the FDO is kept
 18 up to date with what’s happening on the ground so that
 19 the FDO can make a decision about whether or not to
 20 continue Operation Plato?
 21 A. Yes.
 22 Q. That was all that I wanted to ask you about your
 23 background and experience. I’m turning next to ask you
 24 about the night of the attack. We’ll deal with the
 25 introductory matters and then I’ll invite the chairman

1 to take a break.
 2 On 22 May, did you attend the premises at which your
 3 unit was based, which I won’t identify, in order to
 4 perform a night shift on what was known as ARV county
 5 cover?
 6 A. Yes.
 7 Q. Did that mean that you were part of the police resource
 8 available, armed resource available, for the GMP force
 9 area?
 10 A. Yes.
 11 Q. Were you teamed with another AFO, Adam Lewis?
 12 A. Yes.
 13 Q. And was your identifying call sign ARV 7?
 14 A. Yes.
 15 Q. Following a routine briefing, did you and PC Lewis leave
 16 the police premises at about 9.45?
 17 A. Yes.
 18 Q. Who was the driver of your vehicle?
 19 A. Constable Lewis.
 20 Q. Was it conventional in a situation where there were two
 21 AFOs in a vehicle that one would be the driver and one
 22 would take upon the role of OFC if that role was
 23 required?
 24 A. Yes.
 25 Q. What was the reason for that arrangement?

1 A. Firearms officers routinely work in pairs. You will
 2 always have a driver and if the person in the front seat
 3 passenger seat is an accredited OFC, he will take up the
 4 role if required of the OFC. If they are not
 5 accredited, there will be another member of the firearms
 6 team in the passenger seat.
 7 Q. Am I right that, obviously, if you are going to an
 8 incident the driver needs to focus on getting you there
 9 as soon as possible?
 10 A. Yes.
 11 Q. But whilst you are in the vehicle on that journey it
 12 might be necessary for decisions to be made?
 13 A. Yes.
 14 Q. And the driver can't or can't readily do those, and is
 15 that part of the reason why the passenger is or may be
 16 the OFC?
 17 A. Yes.
 18 SIR JOHN SAUNDERS: It sounds like you may need to make
 19 notes.
 20 A. Yes. Sometimes you can pull over.
 21 MR GREANEY: Did the two of you have personal radios on
 22 which you had tuned into a dedicated back-to-back
 23 firearms channel?
 24 A. Yes.
 25 Q. We don't need to know the designation of that channel,

1 but what does the back-to-back facility mean?
 2 A. Basically, it's direct communication with other firearms
 3 units on duty at the time and also direct communication
 4 to the FDO.
 5 Q. Did you also have a pool radio handset tuned into the
 6 radio area channel of whichever area of GMP you were in?
 7 A. Yes.
 8 Q. I will ask you this, just in case it's relevant later.
 9 I think you did have your own personal mobile telephone
 10 with you?
 11 A. Yes.
 12 Q. But you didn't use that for any work purpose during the
 13 events that were to unfold?
 14 A. No.
 15 Q. I think in fact you used it just once that night, to
 16 reassure your wife, who knew the incident that you had
 17 responded to?
 18 A. Yes.
 19 Q. As everyone knows, the FDO on the night of the attack
 20 was Inspector, as he then was, Dale Sexton. Was he
 21 someone that you knew?
 22 A. No.
 23 Q. Had you, so far as you know, ever met him before 22 May?
 24 A. No.
 25 Q. Some time around about 22.30 hours, did you hear

1 something over the radio?
 2 A. Yes.
 3 Q. What did you hear?
 4 A. Another colleague on the ARVs asked if we'd heard about
 5 the job at the arena.
 6 Q. By that stage had you heard anything about the events
 7 at the arena?
 8 A. No.
 9 Q. Had anything been passed about it over the firearms
 10 channel?
 11 A. Other than from Constable Tyldesley.
 12 Q. So was that the first that you knew of anything that was
 13 occurring at the arena?
 14 A. Yes.
 15 MR GREANEY: We are going to turn next to the journey to the
 16 arena and the events. That would be a convenient moment
 17 for a break.
 18 SIR JOHN SAUNDERS: We'll have a quarter of an hour break;
 19 is that enough for you?
 20 A. Yes, sir.
 21 SIR JOHN SAUNDERS: Thank you. 11 o'clock.
 22 (10.47 am)
 23 (A short break)
 24 (11.07 am)
 25 MR GREANEY: Sir, much work has been done to try to identify

1 the name of the exercise. In particular, work has been
 2 done by Mr de la Poer. There isn't a definitive answer
 3 at the moment. Various potential names have been given
 4 by various core participants, we'll have no doubt an
 5 answer in due course, but for my purposes the important
 6 thing is, whatever the exercise was, what the witness
 7 took away from it.
 8 SIR JOHN SAUNDERS: Thank you.
 9 MR GREANEY: We had reached the point, Mr Richardson, at
 10 which you had heard, at about 22.30, your colleague say
 11 something about an incident at Manchester Arena. Very
 12 quickly after that, did you hear the FDO say something?
 13 A. Yes.
 14 Q. What did the FDO say?
 15 A. "At Manchester Arena" — words to the effect of, "At
 16 Manchester Arena, there's been a report of a large
 17 explosion and shots being fired", and then I think he
 18 said standby, at the end of that transmission.
 19 Q. In due course, probably very quickly, was a direction
 20 given by the FDO that ARVs were to make their way to the
 21 arena?
 22 A. Yes.
 23 Q. All ARVs?
 24 A. Yes.
 25 Q. Is that what you and PC Lewis did?

1 A. Yes.
 2 Q. Was PC Lewis more familiar with the geography of
 3 Manchester?
 4 A. Yes.
 5 Q. Did you volunteer to perform the role of OFC at the
 6 arena?
 7 A. Yes.
 8 Q. And did the FDO acknowledge you in that role?
 9 A. Yes.
 10 SIR JOHN SAUNDERS: Is that because you were going to get
 11 there first ?
 12 A. Sir, I didn't know where I was in the force, if I'm
 13 being honest.
 14 MR GREANEY: In fact you obviously were very near indeed,
 15 were you not?
 16 A. I'm led to believe so, yes.
 17 Q. And indeed, do you recall that the FDO asked how far
 18 away you were and PC Lewis advised him, and you, you
 19 were about 90 seconds away?
 20 A. Yes.
 21 Q. At that point was any further direct instruction given
 22 to you by the FDO?
 23 A. No.
 24 Q. What you observe in your witness statement at
 25 paragraph 29 is that you were given no further direct

1 instruction by the FDO prior to your arrival at the
 2 arena, to which we'll turn in one moment, and you add:
 3 "Having taken the role of OFC, I would normally have
 4 been given a full brief by the FDO."
 5 A. Yes.
 6 Q. "I would have sought to make notes at this point in
 7 respect of information, intelligence, overall threat
 8 assessment, police powers, policies, tactic authorised,
 9 contingencies and administration."
 10 A. Yes.
 11 Q. And you'd have done so in the equivalent of the form
 12 that you've produced for us today?
 13 A. Yes.
 14 SIR JOHN SAUNDERS: I know it didn't happen, but you're only
 15 90 seconds away anyway. Would you have remained in your
 16 car to make notes if the FDO was giving you a briefing
 17 or would you have just got on with it?
 18 A. After explaining, sir, the close proximity that we were,
 19 I would imagine, if I was given a briefing, it would
 20 have been very short.
 21 SIR JOHN SAUNDERS: Okay.
 22 A. Any lengthier briefing, we still would have gone to
 23 scene and, if circumstances dictate, I could still take
 24 notes.
 25 MR GREANEY: You say in your statement:

1 "Due to the lack of information provided by the FDO
 2 there was no information for me to take note of."
 3 And I'll ask you a direct question: at the time,
 4 were you unhappy about the absence of the type of
 5 briefing that you would have expected or did you regard
 6 it as understandable in the circumstances?
 7 A. Initially, I could understand within the circumstances.
 8 When we got to the scene, it was predominantly just
 9 updating the FDO with whatever I was in front of.
 10 Q. Did there come a time at which you were unhappy not to
 11 have received more by way of briefing?
 12 A. I don't recall being unhappy about not receiving it at
 13 that time.
 14 Q. We know from various sources that you arrived in the
 15 area of the arena at some time before 22.39.30. We know
 16 that because that's the first time you make a broadcast
 17 about information about what is happening at the arena.
 18 Before we get to that, I would like to establish
 19 with you, not particularly the route that you took to
 20 get to the arena, but where you parked up, because
 21 I confess I haven't followed that.
 22 I'm going to ask that we put on the screen a plan
 23 that we're familiar with. It has been used many times
 24 now. It's {INQ033841/1}.
 25 I know that you've had an opportunity to look at

1 this plan this morning.
 2 A. Yes.
 3 Q. Bearing in mind that you are not the most familiar
 4 person with the geography, having looked at this plan,
 5 are you able to point out to us where the vehicle driven
 6 by PC Lewis with you as a passenger pulled up?
 7 A. Yes.
 8 Q. So could you describe it by, first of all, reference to
 9 a road?
 10 A. Trinity Way.
 11 Q. So that is on the left-hand side. There is a tunnel.
 12 Did you pull up, insofar as you can recall, above the
 13 tunnel, below the tunnel as we look at the plan, or
 14 in the area of the tunnel?
 15 A. Lower from the tunnel.
 16 Q. How much lower?
 17 A. If the arrow keeps pointing down, keep going down...
 18 stop. Slightly to the left on the central reservation.
 19 Q. That's extremely helpful, thank you very much indeed.
 20 Were you literally seconds behind another ARV that
 21 contained PC Tyldesley?
 22 A. Yes.
 23 Q. And PC Dalton?
 24 A. Yes.
 25 Q. And of course PC Tyldesley was the officer who had

1 broadcast the message that had first alerted you to
 2 an issue at the arena.
 3 A. Yes.
 4 Q. As you drove towards the arena, had you driven down
 5 Trinity Way, as we look at the plan, or up Trinity Way
 6 as we look at it?
 7 A. Um...
 8 Q. Had you driven from the direction of Great Ducie Street,
 9 I think you provably have, or from the direction of
 10 Cheetham Hill Road?
 11 A. If the junction to the left —hand side of Great Ducie
 12 Street — that's the direction we came from. Again, the
 13 name of the road, I can't recollect .
 14 Q. Certainly at one stage you have described, I think, New
 15 Bridge Street, and I do believe that New Bridge Street
 16 does connect up with Great Ducie Street, so that makes
 17 sense to us.
 18 So you pulled up a matter of seconds behind the
 19 other ARV and did that park up in the same general area
 20 as you parked up?
 21 A. Yes.
 22 Q. As you arrived at the scene, what did you notice? Did
 23 you notice anything?
 24 A. Just the people leaving the arena.
 25 Q. Was there anything at that stage that caused you

1 particular concern?
 2 A. No.
 3 Q. In that area, at that time, was the general scene one of
 4 calm?
 5 A. Yes.
 6 Q. With hundreds of people walking away?
 7 A. Yes.
 8 Q. Lots of parents and their children?
 9 A. Yes.
 10 Q. And really nothing out of the ordinary?
 11 A. Yes.
 12 Q. Having parked up, did you and PC Lewis start to, as you
 13 put it, kit up?
 14 A. Predominantly I wasn't aware what Lewis was doing, but
 15 I would have taken in the scene from when I'm in the
 16 passenger side of the vehicle. So I was looking at what
 17 the other car was doing and taking in my surroundings.
 18 Q. Obviously you had attended as a firearms officer. By
 19 the time you arrived, was it your understanding that
 20 firearms authority had been granted?
 21 A. It hadn't been granted at that time. We had no
 22 authority at that time.
 23 Q. Was it granted shortly afterwards?
 24 A. Yes.
 25 Q. So as you were taking in the scene, were you doing —

1 I don't want to know where in your vehicle the firearm
 2 was, but were you taking steps to arm yourself with your
 3 firearm?
 4 A. Yes.
 5 Q. Did you have other kit that was important you should put
 6 on, such as ballistic kit?
 7 A. Yes.
 8 Q. I think whilst you were there, still at or around your
 9 vehicle, you were approached by a woman who said that
 10 she had lost her child?
 11 A. Yes.
 12 Q. But obviously, you were there for a particular purpose,
 13 were you not?
 14 A. Yes.
 15 Q. And so did you, although you didn't feel great about it,
 16 suggest that she speak to another officer who was not
 17 there in a firearms role?
 18 A. Yes.
 19 Q. Whilst there on Trinity Way, were you approached by
 20 someone else?
 21 A. Yes.
 22 Q. What did that person say to you?
 23 A. Words to the effect of, "They're letting off fireworks
 24 inside", and he gestured towards the arena, "You need to
 25 do something about it".

1 Q. So you had obviously heard, passed over the radio by the
 2 FDO, a suggestion of an explosion and gunfire. At this
 3 point, before you entered the building, what were you
 4 thinking?
 5 A. Due to the calm nature of the public leaving the venue,
 6 I basically felt it important to update the FDO with the
 7 information that I'd received from this male. But
 8 I still felt at this time there was nothing to indicate
 9 anything further with regards to what had actually been
 10 taking place.
 11 Q. So essentially you were thinking, and no doubt hoping,
 12 that this was a false alarm?
 13 A. Yes.
 14 Q. As you just told us, you thought it was appropriate to
 15 update the FDO with what you knew. No doubt that was
 16 the right thing to do. What we're going to do now and
 17 extensively during the balance of your evidence is to
 18 work through an audio schedule which sets out various
 19 discussions that you were a participant in, generally
 20 over the radio, but also some conversations over the
 21 dictaphone of Mr Dexter, which he switched on after he
 22 had arrived at 11.23. Does that make sense?
 23 A. Yes.
 24 Q. I know that you have had an extensive opportunity to
 25 review the audio schedule; am I correct?

1 A. Yes.
 2 Q. So what we're going to look at first of all is the
 3 update that you gave to the FDO, and I think from what
 4 you've said to us this is an update that you are giving
 5 on Trinity Way before you have entered the building
 6 itself?
 7 A. Yes.
 8 MR GREANEY: Sir, do you have this schedule yourself?
 9 SIR JOHN SAUNDERS: Yes.
 10 MR GREANEY: We're going to look first of all at the first
 11 two entries, 1683 and 1691. This is a radio message
 12 that you passed at the time I have given already. It
 13 starts at 22.39.30.
 14 So within just over 8 minutes of the explosion, you
 15 and your colleague were at the scene and indeed you had
 16 spoken to people and obtained some information, had you
 17 not?
 18 A. Yes.
 19 Q. You said over the radio -- it obviously comes in halfway
 20 through:
 21 "It's actually fireworks that have been going off.
 22 We've got nothing confirmed so far and there is no
 23 sound, but we're just trying to get the public out of
 24 the way."
 25 And Lee Moore, who's one of your firearms

1 colleagues, who we are going to hear from, I fear,
 2 tomorrow morning now, asks:
 3 "Is that you, Eddie?"
 4 That's how you're known, is it not, Eddie?
 5 A. Yes.
 6 Q. You say:
 7 "Yes, yes."
 8 And then you're heard to say, and I should add this
 9 is before Mr Sexton has turned on his dictaphone so we
 10 don't get the other side of the conversation or what
 11 he was saying. You say:
 12 "Is there any -- we are getting in touch with the --
 13 we are outside the arena now and there's nothing to
 14 report. No sound from it. No one. We're at the arena,
 15 boss. We're just trying to confirm or negate. People
 16 are waiting around but they don't seem to be in that
 17 much of a rush to be fair, just bear with me."
 18 So that was your first update at that stage, 22.39,
 19 am I correct? Or do you think (overspeaking) --
 20 A. You're slightly incorrect.
 21 Q. If I'm slightly incorrect, put me right, please.
 22 A. The initial transmission wasn't that I made the
 23 assumption it was fireworks and I didn't relay that to
 24 the FDO. I told the FDO that I was approached by a male
 25 or a member of the public and that is what he had told

1 me. I wouldn't have made that --
 2 Q. So to be fair to you, it actually does cut in part--way
 3 through a sentence and it's entirely possible that the
 4 full sentence would have revealed you saying, "I have
 5 been told by a member of the public that it's actually
 6 fireworks that have been going off".
 7 So that was the first broadcast. Just bear with me
 8 one moment.
 9 (Pause)
 10 Whilst still in the area of Trinity Way and
 11 therefore outside the arena, did you speak to anyone
 12 else, so not the woman with the missing child, not the
 13 man who'd spoken about fireworks, or did you direct
 14 PC Lewis to speak to anyone else?
 15 A. Not PC Lewis, PC Tyldesley.
 16 Q. Forgive me. So what did you direct him to do?
 17 A. I could see clearly that there was a member of staff
 18 from the arena stood at the stairs, the top of the
 19 stairs by the entrance door to the arena. I asked him
 20 to go forward to speak to the staff member to see if he
 21 could give us any information with regards to anything
 22 whatsoever that I could report back to the FDO.
 23 Q. How was it apparent that that person was a member of the
 24 arena staff?
 25 A. He gestured. I presume, not knowing what PC Tyldesley

1 said to the member of staff, but he looked back towards
 2 me, I was looking at PC Tyldesley, and he gestured that
 3 there was nothing to report back.
 4 Q. I was just keen to establish how you knew it was
 5 a member of staff. Was it perhaps because that person
 6 was wearing yellow?
 7 A. Yes.
 8 Q. The colour of ShowSec, as we know.
 9 So the impression you gained from whatever passed
 10 between your colleague and the member of staff was,
 11 what, that there was nothing particular to report?
 12 A. Yes.
 13 Q. So again, this is feeding into the idea that you have,
 14 understandably, that this is a false alarm?
 15 A. I was hoping that, yes.
 16 Q. However, at about that point in time, did you receive or
 17 begin to receive further information from the FDO?
 18 A. Yes.
 19 Q. What was the effect of that information?
 20 A. Words to the effect of: due to the amount of calls
 21 received and the information within those calls, he was
 22 declaring Operation Plato and authorising an emergency
 23 search.
 24 Q. This is well before 10.47, indeed it's probably round
 25 about 10.40 or just after 10.40, just before you enter

1 the building. And you have a recollection of the FDO
 2 saying at that stage that there had been further
 3 information, what, about an explosion and shooting?
 4 A. Yes.
 5 Q. And that as a result, Operation Plato was being
 6 declared?
 7 A. Yes.
 8 Q. We do know that at 10.37 there was discussion about the
 9 declaration of Operation Plato. Did you hear that when
 10 Mr Sexton gave evidence?
 11 A. Like I stated, I haven't fully seen Sexton's evidence,
 12 but I've seen most of it. I don't recall that part.
 13 Q. There was a radio transmission at 10.37, as we believe
 14 the time to be, where a radio operator says, first of
 15 all, "He's considering declaring Operation Plato", and
 16 then says, "He's declared Operation Plato". And
 17 Mr Sexton explained he hadn't made the declaration at
 18 that point in time but he had it under consideration.
 19 A. Right.
 20 Q. But it would seem likely that you were hearing that
 21 broadcast, do you think?
 22 A. If it was on the firearms channel, because that was the
 23 only channel I had available to me.
 24 Q. I shouldn't put words in your mouth. You have
 25 a recollection that before you go into the building you

1 heard the FDO declaring Plato or Plato being declared?
 2 A. Yes.
 3 Q. Was it at about that time that firearms authority was
 4 granted, do you think?
 5 A. Yes.
 6 Q. Was anything else said, and in particular was anything
 7 else authorised at that stage before you entered the
 8 building?
 9 A. An emergency search authorised.
 10 Q. First, Operation Plato. As that was declared, did you
 11 have in mind that you were therefore dealing with
 12 a terrorist incident potentially?
 13 A. Yes.
 14 Q. And from what you said to me earlier, it would seem to
 15 follow that you were thinking in terms of a general
 16 terrorist incident as opposed to necessarily
 17 specifically an MTFA?
 18 A. Yes.
 19 Q. Secondly, emergency search. What is an emergency
 20 search?
 21 A. It's firearms officers entering a building and searching
 22 in a capacity to -- when there's an immediate threat to
 23 life.
 24 Q. Is that implemented only in potentially serious
 25 situations where, as you have said, it's believed that

1 a threat to life may exist?
 2 A. Yes.
 3 Q. How does the response to an instruction to carry out an
 4 emergency search differ from the response to
 5 a declaration of Operation Plato in your mind as
 6 of May 2017, or didn't they differ? It's a rather
 7 complicated question.
 8 A. Just repeat that again, please.
 9 Q. Yes, of course. Two things. On the one hand,
 10 Operation Plato. On the other hand, an emergency
 11 search. How does the response, the initial response,
 12 differ as between those two or is the initial response
 13 the same?
 14 A. For Operation Plato being declared, the emergency search
 15 is the authority to enter, to gain entry and potentially
 16 take on a threat. So they both coincide with each other
 17 for that scenario with the fact that Plato had been
 18 called, if that makes sense.
 19 Q. It does make sense. Have I correctly understood that
 20 initially at least the response is the same or certainly
 21 very similar?
 22 A. Yes.
 23 Q. But is the real difference between what happens in an
 24 emergency search situation and an Operation Plato
 25 situation the declaration of zones in the latter?

1 A. I apologise, I'll ask you to ask that one again.
 2 Q. So what you've agreed with me about or what you've given
 3 evidence to the effect of is that, initially, the police
 4 response is the same whether what has been authorised is
 5 an emergency search or whether what has been declared is
 6 Operation Plato. I'm trying to identify whether there
 7 comes a time at which there is a difference between what
 8 happens in an emergency search and what happens in
 9 Operation Plato. And I was asking you whether the
 10 difference comes when zones have been declared in an
 11 Operation Plato situation.
 12 A. If I'm answering this correctly, the emergency search
 13 tactic to enter a building, like I've stated, is when
 14 there's an immediate threat to life. You are entering
 15 a building understandably on this occasion, Plato being
 16 declared. So I'm of the opinion I'm entering that
 17 building to look for a terrorist now because --
 18 Q. I understand.
 19 A. -- my opinion is we are going to neutralise a threat
 20 that a terrorist is presenting to the general public and
 21 other services that are in the arena. You would enter
 22 and basically look -- you are looking, you are listening
 23 for anything to indicate a direction that you can
 24 travel, which will give you a more direct route to take
 25 on that threat, if I've answered that correctly.

1 Q. I've certainly understood what you have said. I'm not
 2 certain, and this will be my fault, not yours, it's
 3 a complete answer to my question.
 4 What I have understood is that you go into the
 5 building when you are carrying out an emergency search,
 6 believing that you're going to confront or may be going
 7 to confront a terrorist. If you do, you're going to
 8 shoot them dead, and you're looking for any signs that
 9 will help you to identify where that person is or may
 10 be?
 11 A. Yes.
 12 Q. But what I think doesn't happen during an emergency
 13 search but does or should happen during Plato is the
 14 designation of zones as hot, warm and cold?
 15 A. Yes.
 16 Q. I got there in the end and I'm sorry it took me so long.
 17 We've still got you outside the building at this
 18 time and an emergency search has been authorised. So is
 19 this the point in time at which you need to get inside
 20 that building?
 21 A. Yes.
 22 Q. Did you enter the building?
 23 A. Yes.
 24 Q. I think, but you'll tell me if I've got this wrong, that
 25 just before, literally just before you enter the

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1 building, you pass a further message to the FDO. So I'm
 2 going to take you to the message and you can then tell
 3 me where you are.
 4 This is 1856, it's 22.43.05. The reason, it seemed
 5 to me, that this is just before you entered or as you're
 6 entering is because the first image we have of you
 7 within the arena is just inside and is 16 seconds later,
 8 as we will see in a moment.
 9 You say:
 10 "Just confirm what you've heard, please."
 11 And then we have Lee Moore, your AFO colleague
 12 saying something. Was he with you at that time, can you
 13 remember?
 14 A. No.
 15 Q. So he was somewhere else, but did you know that he was
 16 somewhere at the scene?
 17 A. Yes.
 18 Q. He replies:
 19 "I'm with a BTP officer now. We're going up to the
 20 upper floor of the MEN. It's stated that they've got
 21 major casualties upstairs in the MEN and they believe
 22 it's a ball bearing device, stand by for further."
 23 So were you listening to this message, do you think?
 24 A. I don't recall this message on the point of entering
 25 into the building.

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1 Q. Have I misunderstood therefore? In saying, "Just
 2 confirm what you've heard, please", are you encouraging
 3 Mr Moore to pass information that he has or is that
 4 coincidental or don't you know?
 5 A. I'm making an assumption at this time with regards to
 6 this. It's coincidental -- I don't recall getting a lot
 7 of the transmissions, I don't recall -- I'm not stating
 8 that those words or that transmission didn't take place.
 9 Q. In fact we have heard it already. We could hear it
 10 if we wanted to. But I do understand that you've made
 11 clear in your witness statement that you can't possibly
 12 be expected to pull every detail from your memory, given
 13 what you were dealing with that night. Is that a fair
 14 way of putting it?
 15 A. Yes.
 16 Q. And obviously you're going to do your best to help us
 17 interpret these messages when you can't remember them,
 18 but let's just read it through so we can see what's
 19 being said. Mr Moore said:
 20 "I'm with a BTP officer now."
 21 The FDO says:
 22 "Yeah, received."
 23 Mr Moore says:
 24 "I can confirm there's definitely casualties."
 25 Mr Sexton receives. Then Mr Downes, another GMP

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1 officer :
 2 "We have still got ARVs making to scene. Can
 3 we have the correct place to go, please? So entry into
 4 that location."
 5 Lee Moore:
 6 "Boss confirmed. Yes, yes. Operation Plato,
 7 Operation Plato."
 8 So I think you're saying to us that you don't have
 9 a recollection of that particular message occurring just
 10 before you entered the building or as you're entering
 11 the building?
 12 A. Yes.
 13 Q. As I indicated a moment ago, your entry into the arena
 14 is captured on CCTV. First of all, I'm going to ask you
 15 if you can help us with the entrance through which you
 16 went into the arena. If it would help to have the plan
 17 back up, let me know.
 18 A. Please.
 19 Q. Could we have {INQ033841/1}, Mr Lopez?
 20 We can see the Trinity Way tunnel; did you enter
 21 through that tunnel?
 22 A. Not the tunnel.
 23 Q. Where did you enter through?
 24 A. Where my car was parked initially, when I arrived at the
 25 scene, there was a set of doors up a few steps.

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1 Q. I know exactly where are talking about.
 2 A. Pretty much where the yellow area is.
 3 Q. I am not going to press you any further. I do know
 4 where you are talking about.
 5 You entered there that area and you were captured
 6 fairly quickly on the CCTV and we're going to look at
 7 the images of that and then I'm going to return to your
 8 account. So we'll look at the images, we'll identify
 9 the time, and then you can help us with what was
 10 happening.
 11 Can I be clear about what we are not going to see.
 12 For reasons that are perfectly obvious we are not going
 13 to see any image of your face, where it might be
 14 possible to identify you from it. There are some longer
 15 range images of you where your face is not blocked out,
 16 but it's impossible to identify you, and I know that
 17 you have seen those images and you are content with this
 18 approach, are you not?
 19 A. Yes.
 20 Q. Let's look at the images. First of all, they're all
 21 from the same sequence of events, Mr Lopez, it's
 22 {INQ035612/75}. It's not an image of you, it's an image
 23 of your colleagues.
 24 MR COOPER: So far as the families which are concerned,
 25 there's nothing that may cause them distress as well.

1 MR GREANEY: That's very helpful. I'm not going to show any
 2 images of the City Room but nonetheless I recognise
 3 these images could be distressing and I am most grateful
 4 to Mr Cooper for that confirmation.
 5 Page 75 is going to show your colleagues who had
 6 arrived just seconds before you and enter just before
 7 you as well.
 8 It's 22.42.44. It's PC Tyldesley and PC Dalton who
 9 have entered via the lower Trinity Way exit doors.
 10 Next, please, INQ035612 —
 11 SIR JOHN SAUNDERS: Is that the same place?
 12 MR GREANEY: Yes, that is the same entrance through which
 13 you enter a very short time later.
 14 A. Yes.
 15 Q. In fact, we're going to see a shot from exactly the same
 16 camera of you and PC Lewis next.
 17 {INQ035612/82}, please. This is 37 seconds later,
 18 22.43.21. We can see that you, you with the big white
 19 block over you, and PC Lewis enter the arena. It's
 20 a shot from exactly the same camera, as I've said.
 21 Next, please, {INQ035612/87}. Here you are,
 22 22.44.06. As I said, I'm going to ask you what is going
 23 on in a moment. You are continuing your journey through
 24 the arena, are you not?
 25 A. Yes.

1 Q. {INQ035612/98}, next. 22.44.06. We are now at 22.45.41
 2 and you are not far at all from the doors to the
 3 City Room.
 4 Then {INQ035612/101}, please, 22.46.04. We can see
 5 there are PCs Tyldesley and Dalton followed by you and
 6 PC Lewis. And very shortly indeed after that, can you
 7 confirm, you and your fellow AFOs enter the City Room?
 8 A. Yes.
 9 Q. There is imagery from within there and we are certainly
 10 not going to show any of it for the sake of everybody,
 11 including particularly the families.
 12 I'm going to show you one more image.
 13 {INQ035612/336}, please. Just make sure that that is
 14 not an image of the City Room before you put it on the
 15 screen, please, Mr Lopez. It should be an image of the
 16 overbridge.
 17 Yes. So the top image, 23.30.42. You are now with
 18 Chief Inspector Dexter, the ground—assigned tactical
 19 firearms commander, and you are walking away from the
 20 City Room at that stage.
 21 A. Yes.
 22 Q. So can I check? Had you remained in the City Room for
 23 the whole of the period between going in and coming out
 24 with Chief Inspector Dexter?
 25 A. Yes.

1 Q. Thank you very much. Could you take that from the
 2 screen, please?
 3 Let's return then to that journey that we've seen
 4 part of into the arena and into the City Room.
 5 Sir, for your benefit, I am at paragraph 38 of the
 6 second statement.
 7 As you and your colleagues entered the arena, did
 8 you ask that the arena member of staff that you have
 9 previously mentioned accompany you to act as a guide?
 10 A. Yes.
 11 Q. And did he do so?
 12 A. Briefly.
 13 Q. Did the four of you enter the building in a particular
 14 way in accordance with your training?
 15 A. Yes.
 16 Q. I don't think we need to know any more, save that, as
 17 we have seen, you were at the back.
 18 A. Yes.
 19 Q. Were you at all familiar with the building into which
 20 you were entering?
 21 A. No.
 22 Q. Had you ever been there before, let alone been through
 23 that door and that route into the arena?
 24 A. No.
 25 Q. As you entered, as we've seen you did, the concourse on

1 the other side of the doors to the City Room, so the
 2 concourse, as you entered that area, was there anything
 3 that you saw that was or appeared to you particularly
 4 unusual?
 5 A. Just clarify the location again, please.
 6 Q. This is before you have gone through the doors from the
 7 internal concourse into the City Room. So this would be
 8 an area from which certainly at some points you'd be
 9 able to see into the arena bowl itself. At that time
 10 before you entered the City Room, what did you observe,
 11 if anything?
 12 A. From the concourse we made up a set of stairs into the
 13 bowl area. And then we made to the right-hand side,
 14 around the perimeter of the bowl, to which I saw to my
 15 left or into the arena side, the arena area, the roadies
 16 or workmen from the concert, sort of working.
 17 Q. So did it appear to you to be quite a normal scene at
 18 that stage?
 19 A. Yes.
 20 SIR JOHN SAUNDERS: The bowl was empty, was it, of people?
 21 A. Yes, sir, of people. The roadies were just stripping
 22 the equipment down from what I now know was to be the
 23 concert of Ariana Grande.
 24 MR GREANEY: Any sign of any injured person at that stage?
 25 A. Not that I was aware of.

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1 Q. So there was nothing at that stage, as you're making
 2 your way to what we know becomes the City Room, nothing
 3 to see particularly, but was there anything that you
 4 were able to smell?
 5 A. Later on in the duration of going round the bowl, all of
 6 us were aware of a smell of like an explosion.
 7 Q. The way you put it is, and we're not going to dwell on
 8 this, the smell of an explosion similar to that of
 9 cordite?
 10 A. Yes.
 11 Q. And it was getting stronger as you got nearer to what
 12 you were to discover was the City Room; is that right?
 13 A. Yes.
 14 Q. So were you therefore becoming increasingly concerned,
 15 bearing in mind what you'd been told and what you could
 16 now smell, that a terrorist attack had indeed occurred?
 17 A. Yes.
 18 Q. With that state of mind, did you issue any instruction
 19 as OFC to the other firearms officers?
 20 A. Yes.
 21 Q. What was that instruction?
 22 A. Advance mode.
 23 Q. What did that mean and what did it cause to happen?
 24 A. Basically, our team, me including the other three, speed
 25 up our pace towards the direction of where the smell was

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1 coming from.
 2 Q. Were you and, as you expected, your colleagues now in
 3 a heightened state of alert and ready to shoot someone
 4 if confronted by someone engaged in an act of terrorism?
 5 A. Yes.
 6 Q. Did you arrive at the doors to the City Room and enter
 7 it?
 8 A. Yes.
 9 Q. I'm going to deal with this in very general terms for
 10 reasons that you will understand, but did you become
 11 aware of people who were fleeing that area?
 12 A. Yes.
 13 Q. And of people who were injured?
 14 A. Yes.
 15 Q. Were you able to see that there were members of the
 16 arena staff there?
 17 A. Yes.
 18 Q. Was the alarm sounding?
 19 A. Yes.
 20 SIR JOHN SAUNDERS: Which you couldn't hear when you were
 21 in the bowl?
 22 A. No, sir.
 23 MR GREANEY: Did you survey the entire scene?
 24 A. From my recollection, as best as I could, without fully
 25 committing into the City Rooms.

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1 Q. And did you survey the area in order to get an
 2 understanding of the scene?
 3 A. Yes.
 4 Q. And to develop situational awareness, as we now know it
 5 to be called?
 6 A. Yes.
 7 Q. Were you able to see that not only were you dealing with
 8 a situation in which people were injured, but
 9 a situation in which people appeared to be dead?
 10 A. Yes.
 11 Q. Believing that there might be an active shooter at
 12 large, did you give an instruction to any members of
 13 your team?
 14 A. Yes.
 15 Q. What was that instruction?
 16 A. In layman's terms, spiky bubble. Basically, guns left
 17 and right down the concourse in case we're approached
 18 whilst the doors behind us were to be sentried because
 19 they are still a consideration.
 20 Q. We don't need to go too much into tactics, but you've
 21 got guns that are pointed into the City Room in case
 22 anyone comes?
 23 A. The concourse, left and right of the concourse, and
 24 myself and Constable Lewis were conducting a sweep of
 25 the City Room.

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1 Q. That's my fault. I've now understood. So you're
 2 covering off the concourse that leads to the arena bowl
 3 in case a threat comes from that direction?
 4 A. Yes.
 5 Q. And you and — which colleague was it?
 6 A. Constable Lewis.
 7 Q. You enter at that stage the City Room in order to carry
 8 out what you've described as a sweep?
 9 A. Yes.
 10 Q. A sweep being a search with guns pointed in order to see
 11 if there is an armed suspect in there?
 12 A. Yes.
 13 SIR JOHN SAUNDERS: How easy was it to see in there?
 14 A. With regards to visibility, sir?
 15 SIR JOHN SAUNDERS: Yes.
 16 A. There was like smoke... It was clear enough to see what
 17 I was looking at.
 18 SIR JOHN SAUNDERS: Thank you.
 19 MR GREANEY: Now, two things. The first I know will be
 20 difficult for you to deal with, although everyone in
 21 this room will understand what your responsibilities
 22 were as the OFC there, but there were people who were
 23 injured and in need of treatment, were there not?
 24 A. Yes.
 25 Q. Did you treat them?

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1 A. No.
 2 Q. In very simple terms, why was that?
 3 A. Because I had another role to perform.
 4 Q. That role, in very simple terms, was to neutralise
 5 a threat if there was a threat there?
 6 A. Yes.
 7 Q. Secondly, how long did it take you to perform that
 8 sweep?
 9 A. I honestly can't recall.
 10 Q. I think from the timings we have, because we're going to
 11 come on to a situation report you give to Mr Sexton in
 12 a moment, it must have been a matter of a couple of
 13 minutes, 2 or 3 minutes at the most?
 14 A. At the most, yes.
 15 Q. And what were you able to establish in that period
 16 in relation to the question of whether there was an
 17 active shooter in that area?
 18 A. With regards to the information that we received from
 19 Inspector Sexton, it was confirmed that there was
 20 a bomber who was at scene in the concourse area,
 21 adjacent to the City Rooms, multiple casualties, walking
 22 wounded, staff members, and the alarm going off.
 23 Q. Was there, so far as your sweep revealed, any terrorist
 24 armed with a firearm or with anything?
 25 A. None blatantly obvious.

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1 Q. So at that stage, did you decide it was appropriate to
 2 update the FDO?
 3 A. Yes.
 4 Q. I mentioned that update a moment ago. It's an important
 5 one, but I'm not going to ask that it be played because
 6 of what we're able to hear in the background, which will
 7 be distressing. But I think you accept that what
 8 you were doing at that stage as OFC was to perform
 9 a role as the FDO's eyes and ears?
 10 A. Yes.
 11 Q. Enabling him to gain situational awareness?
 12 A. Yes.
 13 Q. And would you have expected him to have taken into
 14 account what you were saying in decisions that he made?
 15 A. There's an expectation there, yes.
 16 Q. Well, it would be odd if he didn't, would it not? Now,
 17 the update that you give is our line 2223. It's timed
 18 at 10.48.05. That's why I say it can only have been
 19 a couple of minutes — not a criticism — that it took
 20 you to do your sweep.
 21 At 22.48.05 you make a call. I'm just going to run
 22 through it and then I'll have some questions for you.
 23 You state:
 24 "Just at the moment we've got a large number of
 25 casualties. Inside the entrance to the arena, some are

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1 not in a good way. We've got paramedics and people
 2 administering first aid."
 3 I think, I'm sure you'll know, in fact there were no
 4 paramedics in the room at that stage.
 5 A. I'm aware of that now.
 6 Q. And you're probably describing people who work for an
 7 organisation called ETUK —
 8 A. Yes.
 9 Q. — who were wearing a green uniform? We know that the
 10 first paramedic to enter does not enter until 22.53 and
 11 it isn't until 23.15 that two members of HART enter:
 12 "We've got to consider [you said] also a secondary
 13 device and we've got no one else coming forward
 14 in relation to anyone else who's been involved with
 15 this, but we need to start getting the public out the
 16 way from the front. We've got..."
 17 And you identify a number of ARVs present. And,
 18 again, you say:
 19 "... a number of paramedics administering
 20 first aid."
 21 Mr Sexton says:
 22 "Yeah, received. We'll get the people moved from
 23 outside the location, declare a sterile area as soon as
 24 we can, and try to get more resources down there to
 25 clear."

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1 Then a little further down the page, you ask about
 2 getting:
 3 "Can we have explosive dogs on board, please?"
 4 Do you see that?
 5 A. Yes.
 6 Q. I'm well aware, sir, that those who are listening might
 7 have found that not entirely straightforward to follow.
 8 I hope it's been fairly clear. I'm going to go over
 9 some of the detail now.
 10 First, from that moment, 22.48, you are asking for
 11 explosives dogs?
 12 A. Yes.
 13 Q. Why?
 14 A. Due to, obviously, the environment that we were in,
 15 there was bags present, understandably, people leaving
 16 the scene, dropping bags. There was also bins present
 17 within the arena complex. There's always
 18 a consideration or potential for a secondary device with
 19 regards to a primary device, a primary device being to
 20 attract emergency services, and a secondary device to
 21 continue with increased casualties.
 22 Q. And to be fair to the point you're making, you actually
 23 reference the risk of a secondary device in that
 24 situation report that you provided.
 25 A. Yes.

1 Q. I do appreciate the answer to this question is obvious,
 2 but where do explosives dogs come into that situation?
 3 A. They can basically sniff out explosives. They're
 4 trained in sniffing out explosives if they're present.
 5 SIR JOHN SAUNDERS: So when you were doing your search of
 6 the premises looking primarily for a gunman, were you
 7 also on the lookout for secondary devices or did you
 8 just find it an impossible thing to do because of the
 9 number of bags around?
 10 A. It's not like you've got X-ray vision for secondary
 11 devices, I hope you don't mind me saying. It's very
 12 hard to sort of identify or put into consideration to
 13 clear an area so then we can, within reason, relax that
 14 area and we can call more people in if we know there's
 15 no secondary device. Obviously they don't just come as
 16 soon as you click your fingers, but there was also a
 17 consideration for a shooter with regards to the
 18 information I was given by Inspector Sexton.
 19 MR GREANEY: Just a couple of points to pick up from that.
 20 First, to be fair to you, you do say in a subsequent
 21 situation report that bags had been dropped over the
 22 place.
 23 A. Yes.
 24 Q. Secondly, you are concerned about two things: an active
 25 shooter, and it's really your job, as the OFC with your

1 AFOs, to ensure that either there isn't such a person
 2 or, if there is, he's shot dead?
 3 A. Yes.
 4 Q. And thirdly, you're also concerned about secondary
 5 devices?
 6 A. Yes.
 7 Q. And that's where the explosives dogs come in?
 8 A. Yes.
 9 Q. Now, we know that it was not until nearly an hour later
 10 that the first such dog arrived. So the first mention
 11 of a dog, Mojo, is at 11.43, and Mojo doesn't get into
 12 the room until 11.47, so almost literally an hour after
 13 you first called up for explosives dogs. Is it
 14 acceptable in your view that there was such a period
 15 that passed between the request and the achievement of
 16 dogs in the area?
 17 A. I know there's only so many dogs that are trained to
 18 sniff out explosives and they're not always on duty.
 19 I don't think it was a GMP dog.
 20 Q. It was a BTP.
 21 A. And something -- I'm of the opinion that they were about
 22 to go off duty at that time or they were off duty and
 23 they came back in after hearing about the incident.
 24 Whether I'm right in saying that ... But I know they
 25 don't turn up within seconds or minutes of being

1 requested.
 2 Q. It is still nearly 60 minutes and the public might feel
 3 it seems like a long time. And to you, and we're going
 4 to see you continue to make requests at intervals,
 5 at the time was it seeming like a long period to you
 6 before the dogs --
 7 A. Very much so, yes.
 8 Q. That was the first broad issue I wanted to ask you about
 9 arising out of that situation report at 22.48.
 10 Secondly, as we've seen, you say:
 11 "We've got no one else coming forward in relation to
 12 anyone else who's been involved with this."
 13 What did you mean by that?
 14 A. I understand at the time I was struggling for words, so
 15 it most probably wasn't explained quite clearly.
 16 Q. Can I be clear, there was no criticism intended in my
 17 question. I think I do know what you meant, but I want
 18 to give you an opportunity to explain in your own words.
 19 A. Basically, we haven't identified anyone further who is
 20 involved in acts of terrorism, an active shooter or
 21 anyone involved.
 22 Q. Thirdly, that leads directly to the issue of zoning that
 23 we touched upon earlier. Because where you'd reached by
 24 22.48, as I have understood it, is so far as you had
 25 been able to ascertain there was no active shooter,

1 although I do appreciate you couldn't exclude the
 2 possibility of someone hiding away somewhere?
 3 A. Yes.
 4 Q. Secondly, you were certainly concerned about secondary
 5 devices within that room?
 6 A. Also, yes.
 7 Q. As I said, this leads to zoning. What I'm going to do
 8 is to read to you paragraphs 50 to 52 of your second
 9 witness statement and then I'm going to ask you some
 10 questions. I'm sure you understand what the relevance
 11 of this is.
 12 You're talking about this conversation we've looked
 13 at, I think:
 14 "I confirmed that the FDO that it appeared that
 15 someone had blown themselves up in the arena he asked
 16 for updates on casualties. I recall informing the FDO
 17 that there had been an explosion with at least one
 18 fatality, this being the bomber, and numerous wounded,
 19 some of which were walking wounded."
 20 Then this:
 21 "I told the FDO that although the foyer was to be
 22 considered a hot zone, ie potentially posing a serious
 23 threat to those present, I felt it should be treated as
 24 a warm zone so that casualties could be tended to and
 25 evacuated by first responders. I considered that the

1 City Rooms could still be a hot zone and based on the
 2 fact that I couldn't be absolutely certain that lay
 3 among the carnage was not another IED..."
 4 The final part of that sentence is operationally
 5 sensitive for reasons I simply don't understand and will
 6 need to check. Paragraph 52:
 7 "It was not feasible to enforce the hot zone and
 8 evacuate all unarmed first responders as this would have
 9 left multiple serious injured casualties with no
 10 treatment or evacuation. Many more casualties could
 11 have died from their injuries. The pragmatic approach
 12 was to treat the City Rooms as warm."
 13 There are two aspects of this that I want to explore
 14 with you. One is whether you did say to the FDO
 15 anything about zones, and please don't understand me to
 16 be accusing you of being anything other than
 17 straightforward and doing your best to give an accurate
 18 account, but I do need to explore with you, whether or
 19 not you actually said that to the FDO.
 20 Secondly, and perhaps more importantly, I want to
 21 explore with you your state of mind about the City Room
 22 at this time, 10.48, so at an early stage.
 23 What I'm going to do is identify a series of factors
 24 and then ask you to reflect on whether you in fact
 25 discussed zoning with the FDO. We have the conversation

1 that you had with the FDO just after you'd done your
 2 sweep and we've just looked at it. It's captured on the
 3 firearms channel recording and part of it on the
 4 dictaphone, and you cannot be heard to say in that
 5 recording of that conversation anything about zoning.
 6 Secondly, you don't mention, I don't believe, zoning
 7 in any subsequent message that you pass over the radio,
 8 and thirdly, to put it neutrally, the FDO has no
 9 recollection of you mentioning zoning.
 10 So having thought for a moment about those features
 11 of the evidence, do you believe that you did, as you
 12 recorded in your statement, tell the FDO that the foyer
 13 was hot but should be treated as warm so that casualties
 14 could be treated?
 15 A. Yes. My honestly held belief is that I did say this on
 16 the air. It wasn't how it says on the statement with
 17 regards to a conversation, which would be a two-way
 18 conversation, but more of a statement that I'd made over
 19 the transmission. That's what I'm of the belief that
 20 I did and I still -- being aware of circumstances now,
 21 I still believe that I've had that conversation as I did
 22 also with other colleagues, firearms officers, in the
 23 close proximity of me.
 24 Q. So I think what you're saying is that the factors that
 25 I have just drawn to your attention, they're ones that

1 you are well aware of and that you've thought about
 2 before entering the witness box?
 3 A. Yes.
 4 Q. But you continue to hold the view that you did pass that
 5 message or a message to that effect over the radio?
 6 A. Yes.
 7 Q. What I've understood is that your recollection is that
 8 you passed that message in your update after you had
 9 conducted the sweep; is that right?
 10 A. Yes.
 11 Q. Are you able to account for or give any explanation for
 12 why that part of the message that you believe you passed
 13 doesn't feature in the recording that we have?
 14 A. There could be a number of explanations. One obviously
 15 is it may not have happened, and due to the incident
 16 taking place, I'm fully aware of perceptual distortion
 17 and also things that you may think have happened what
 18 hasn't happened or you may not have said that to the
 19 person that you think you may have said it to because
 20 these messages were also said to the members of my team
 21 which were increasing as time goes by. It could be
 22 I didn't press my pressel, my push-to-talk on my radio,
 23 which was situated between my head and my mouth and my
 24 body armour. It could be the fact that the transmission
 25 can only allow one person to talk at once, that it was

1 interrupted, which would block all communication, there
 2 would be an indication of that with the earpiece, which
 3 would make a specific noise, but obviously due to the
 4 surrounding noise, it'd be very hard or very difficult
 5 to hear. So with regards to that, I still stand by the
 6 fact that I do genuinely believe that I said that.
 7 Whether it was received --- and it seemed to be quite
 8 clear it wasn't received by the FDO, but I am of the
 9 honestly held opinion that I did say that.
 10 Q. I don't know what others will suggest to you. I'm not
 11 suggesting that what you've told us about is anything
 12 other than an honestly held belief. Thank you very much
 13 for that clear answer, in which you have accommodated
 14 the possibility that this is due to what you have
 15 described as perceptual distortion. I may have got that
 16 wrong, but you know what I mean.
 17 SIR JOHN SAUNDERS: That's what he said.
 18 MR GREANEY: I'm going to leave that there, but we'll move
 19 on to the second issue I want to explore, which is:
 20 whether you sent that message, whether it got through.
 21 I think we can be clear, can we not, that at 10.48
 22 you thought that the City Room was hot but ought to be
 23 treated as warm?
 24 A. Yes.
 25 Q. Why did you think it was in fact?

1 A. Due to the terrorist activity that had taken place and
 2 the potential predominantly of a secondary device that
 3 could be activated or a follow-up from someone else
 4 involved in the atrocity.
 5 Q. Why did you nonetheless think that the City Room should
 6 be treated as warm?
 7 A. To get anyone in, outside agencies, who can assist with
 8 casualty treatment and evacuation.
 9 Q. So it seems that your intention was that the specialist
 10 teams of the other emergency responders should be
 11 in that City Room fairly quickly after 10.48?
 12 A. Realistically, I'm aware that if you ask for the HART
 13 team, they're not going to be around the corner or
 14 a possibility of not being around the corner, but all
 15 hands on deck at that point, you need anyone and
 16 everyone who can administer trauma care and anyone who
 17 can evacuate casualties.
 18 Q. So that's what you wanted to achieve?
 19 A. That's what I wanted to achieve: the extraction of
 20 casualties and treatment.
 21 Q. And you were there for a prolonged period. Would it be
 22 fair to say that that was not achieved? I'll develop
 23 that question slightly. Because the SRT of
 24 Greater Manchester Fire and Rescue Service were never
 25 there at any relevant time and as for HART, two members

1 entered but not until 11.15, although Mr Ennis, an
 2 advanced paramedic, had been there first at 22.53. So
 3 a rather long question, though not the longest.
 4 Did what you wanted to be achieved --- was it
 5 achieved, all hands to the pump?
 6 A. There were people coming in, all types of uniform,
 7 whether it be from BTP, whether it be from NWAS, there
 8 were people coming in and extracting casualties and
 9 dealing with casualties. Obviously, the presence of the
 10 Fire Brigade would have been advantageous with regards
 11 to treating casualties.
 12 Q. And removing casualties?
 13 A. And removing casualties. Even members of the public who
 14 were outside, who may have been aware and had sort of
 15 the courage to re-enter somewhere where they initially
 16 ran away from, if that hadn't have taken place,
 17 undoubtedly we would have had more casualties than what
 18 we actually had.
 19 Q. You may well be right. But there is, can you agree, an
 20 obvious difference between a member of the public, even
 21 one with first aid training, and a HART paramedic?
 22 A. Yes.
 23 Q. We have heard from Sergeant Kam Hare --- I don't know
 24 whether you saw his evidence?
 25 A. No.

1 Q. I don't think it would be an exaggeration to say that
 2 he was desperate for more paramedics to come into that
 3 scene. Did you have that sense or feeling at the time
 4 as well?
 5 A. It was disbelief what I was looking at. I couldn't
 6 believe what was going on. And if I said underneath,
 7 inside, sort of flapping, shall we say, with regards to
 8 what I was looking at, that would be an understatement.
 9 Q. I won't press you further on that. I am just going to
 10 take you in this same context to JOPs again. So
 11 Mr Lopez, this is {INQ008372/9}, please. Paragraph 4.2.
 12 It's the bottom half of the page:
 13 "The police will inform emergency service partners
 14 immediately once an MTF A has been declared to enable
 15 Fire and Rescue Service and ambulance services to put
 16 their contingency plans into effect."
 17 Did you regard it as your job as OFC there on the
 18 ground to inform emergency service partners that
 19 Operation Plato had been declared?
 20 A. No.
 21 Q. Whose job was it?
 22 A. The radio room or the FDO --- and he would task someone
 23 from the radio room.
 24 Q. Did you in fact inform any emergency service partners
 25 that Operation Plato had been declared?

1 A. No.
 2 Q. Did you inform any emergency service partners about the
 3 zoning within the City Room and beyond?
 4 A. No.
 5 Q. Did you say, for example, to Advanced Paramedic Ennis,
 6 who was in the City Room, or to the HART members who
 7 attended that you considered that the area was a hot
 8 zone, but that it was to be treated as a warm zone?
 9 A. I have never spoke to Advanced Paramedic Ennis.
 10 Q. Where we've reached is that in your own mind you were
 11 making quite an important decision, were you not?
 12 A. Yes.
 13 Q. "This is a hot zone but I need to treat it as warm." Is
 14 the reason that you didn't tell, for example,
 15 Paddy Ennis that, or any other member of the emergency
 16 services, because you didn't want to have that
 17 discussion with them?
 18 A. I didn't have that capability.
 19 Q. What do you mean by that?
 20 A. At the time, within the City Rooms, my kit and equipment
 21 on my person is standard ARV kit and equipment, and one
 22 radio. GMP predominantly issue one radio, which is
 23 predominantly passed to the firearms channel, so any
 24 requests that I would make with regards to any other
 25 emergency service would be via the FDO.

1 Q. I entirely understand and my question was insufficiently
 2 focused. What I meant was, we know, as I pointed out to
 3 you, that Patrick Ennis first entered the City Room at
 4 22.53, members of HART entered at 23.15, and from what
 5 you've said to us, you did not have any discussion with
 6 those people about your views about zoning of the
 7 City Room.
 8 A. No.
 9 Q. I'm going to ask you a very direct question, which is
 10 whether you were (inaudible: distorted) about the status
 11 of that room from them because you didn't want them to
 12 withdraw?
 13 A. No.
 14 Q. What therefore is the reason why you didn't discuss your
 15 views about zoning with them?
 16 A. Everything directed over the firearms channel I had were
 17 requests with regards to asking -- at one point I think
 18 I said in my statement -- it states that I asked for all
 19 emergency services who had trauma care capability.
 20 I would take the assumption then that that would be
 21 relayed back to relevant services who were coming to
 22 scene, including the hot zone, the warm zone, also being
 23 mindful of the fact that you've got the cold zone area,
 24 but inside the City Rooms and around the close proximity
 25 of that was never a cold zone for me.

1 Q. Although you didn't, it seems, know the precise
 2 definitions of hot, warm and cold, what you did know on
 3 the night of 22 May was that if a zone is hot, that even
 4 the specialist capabilities of the Fire and Rescue
 5 Service and the Ambulance Service won't be in there?
 6 A. Yes.
 7 Q. Your view was that the City Room was hot, but you wanted
 8 the people who were there to stay?
 9 A. Only as a result of a secondary device. We had no
 10 further intelligence for a follow-up of an active
 11 shooter, so a secondary device, not many people can
 12 protect themselves from. However, if we did not get
 13 people in, we would not be getting casualties, walking
 14 wounded or people treated, so the quantity of people who
 15 died would be greater.
 16 Q. I entirely understand your reasoning, and that isn't
 17 what I'm trying to unpick.
 18 A. Sorry.
 19 Q. It isn't your fault and I do understand it's difficult.
 20 I will just ask this one more time and then we will move
 21 on.
 22 Bearing in mind that you knew that emergency
 23 services ought to withdraw from the zone if it's hot,
 24 bearing in mind that you thought in your own head the
 25 City Room was hot, bearing in mind that you didn't want

1 emergency services to withdraw, is the reason why you
 2 didn't have a discussion with Patrick Ennis because you
 3 were worried, if you did, they would withdraw?
 4 A. No.
 5 Q. Why didn't you then have that discussion?
 6 A. I was around the firearms team, between the City Rooms
 7 and the concourse, I was approached by some area staff,
 8 unarmed staff, with regards to sort of further enquiries
 9 they wanted to make within the arena, which I dealt
 10 with. I didn't identify anyone of a sort of supervisory
 11 role within the... NNAS or the paramedics who were at
 12 scene. It wasn't clear to me who was sort of the
 13 supervisory role.
 14 Q. I am very clear that whatever the reason, you were not
 15 deliberately concealing from anyone --
 16 A. No.
 17 Q. -- your thought processes. I am just going to ask you
 18 about a couple of other parts of JOPs whilst we've got
 19 them on the screen. We don't. Could we have
 20 {INQ008372/13}, please. The top half of that page first
 21 of all.
 22 Really, I'm just keen to receive your evidence about
 23 whether you are a person described in these parts of
 24 JOPs or not. So paragraph 4.8:
 25 "The police on-scene commander, in consultation with

1 the Fire and Rescue Service and ambulance counterparts,
 2 is responsible for identifying a suitable FCP for
 3 specialist emergency service personnel.”
 4 For these purposes, were you the or a police
 5 on-scene commander?
 6 A. Yes.
 7 Q. Did you know what an FCP was?
 8 A. Yes.
 9 Q. Did you consult with the Fire and Rescue Service and
 10 Ambulance Service about the identification of a suitable
 11 FCP?
 12 A. No.
 13 Q. Why was that?
 14 A. I’m — albeit I’m an on-scene commander, I’m the
 15 on-scene commander for the firearms resources.
 16 Predominantly NWS and the Fire Brigade would be at
 17 an RVP, some distance away, until required to come to
 18 scene.
 19 Q. Yes.
 20 A. I would call them via the — with the GMP role, with the
 21 one radio I’ve got via the FDO, so I would predominantly
 22 put my requests through the FDO, who would seek sort of
 23 a way of getting in touch, in contact with resources
 24 at the RVP.
 25 Q. So to be fair to the point you’re making, can we go to

1 {INQ008372/14} and 4.10. The top of that page, please:
 2 “The police on-scene commander will lead a joint
 3 assessment of risk at the FCP (or RVP) with ambulance
 4 and Fire and Rescue Service counterparts to determine
 5 when and where to deploy emergency service responders.”
 6 And so on. And I believe the point you’re making
 7 is that it would be difficult for you to be at the FCP
 8 or RVP because you need to be there at the scene,
 9 commanding the armed assets?
 10 A. Yes.
 11 Q. So who in your view, and you were there on the night,
 12 was the on-scene commander who ought to have been
 13 identifying a suitable FCP and then undertaking a joint
 14 assessment of risk at that location?
 15 A. Well, there was none at scene with regards to GMFRS or
 16 NWS. I was the initial beginning of the command
 17 structure for firearms, sort of, assets, and I would —
 18 predominantly it was me who is the command structure
 19 initially, but for the firearms assets.
 20 Q. And who was commanding the unarmed asset?
 21 A. I don’t know.
 22 Q. That wasn’t your job?
 23 A. No.
 24 Q. We’ve spent a lot of time dealing with those first few
 25 minutes and we are, everyone will be pleased to hear,

1 now going to pick up speed and we’ll do so by using the
 2 schedule.
 3 SIR JOHN SAUNDERS: Just before you pick up speed, it’s
 4 apparent from what you have said when going through
 5 JOPs, this version of JOPs at the time, that from your
 6 point of view it didn’t adequately or correctly deal
 7 with the situation that you were faced with.
 8 A. Yes.
 9 SIR JOHN SAUNDERS: There is now another version of JOPs,
 10 I’m not going to ask you what it says, but there is
 11 another version of JOPs. Are you aware of it?
 12 A. No, sir.
 13 SIR JOHN SAUNDERS: Thank you.
 14 MR GREANEY: Sir, we’ve been going for about an hour and
 15 20 minutes. I wonder if having a short break and then
 16 I’ll conclude and we’ll take lunch — would be —
 17 SIR JOHN SAUNDERS: I’m very happy to go whichever way you
 18 like.
 19 MR GREANEY: Can we have just 10 minutes, please, sir?
 20 SIR JOHN SAUNDERS: Absolutely.
 21 (12.20 pm)
 22 (A short break)
 23 (12.37 pm)
 24 MR GREANEY: Mr Richardson, just before we turn to the
 25 schedule, I have been asked to deal with one short topic

1 with you, and I will do it at this stage. Were you
 2 wearing a body-worn camera that night?
 3 A. No.
 4 Q. Was that a matter of decision by you or at that stage
 5 did AFOs not generally wear body-worn cameras?
 6 A. It wasn’t a piece of equipment that AFOs were issued
 7 with.
 8 Q. The question I’ve been asked to pose is: moving forward,
 9 would you see a benefit in terms of evidence gathering
 10 if AFOs were equipped with body-worn cameras?
 11 A. Most definitely.
 12 Q. Let’s go to the schedule. You were involved in many
 13 messages over the 21 pages of this schedule, and you did
 14 give a number of situation reports to (inaudible:
 15 distorted). That I completely understand. I’m not
 16 going to look at every entry, I’m going to look at the
 17 most important ones and try to develop the themes of
 18 what was happening over the golden hour and the period
 19 that followed. Does that seem like a sensible approach?
 20 A. Yes.
 21 Q. If I’ve missed anything important, I’m sure it’ll be
 22 covered.
 23 Could you go to the second page of the schedule,
 24 please. It is entry 2735. Again, if I go through this
 25 too quickly, if anyone else thinks I am doing so, I hope

1 they will tell me.
 2 This is an entry timed at 22.53.28. You're giving
 3 a situation report to Mr Sexton:
 4 "No change to the situation. We've got some staff
 5 coming in. They're assisting. Any medical assistance
 6 they can do. We've got mass casualties. It does look
 7 like it's been like a nail bomb."
 8 And you describe why you think that. You also
 9 describe the murderer, which I won't go over. Then you
 10 add:
 11 "There's nothing to suggest anyone further."
 12 So this is you saying again, nothing to indicate an
 13 active shooter; am I correct?
 14 A. Yes.
 15 Q. Then you add:
 16 "Have you got any movements in relation to an
 17 explosives dog?"
 18 This is the second time you have mentioned that and
 19 it illustrates how keen you were to get such a dog in
 20 there to assist with excluding the possibility of
 21 a secondary device?
 22 A. Yes.
 23 Q. Then you say, and I perhaps should have taken you to
 24 this earlier when I was asking you about how keen you
 25 were, like Sergeant Kam Hare, to get more paramedics to

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1 the area. Can you see, having been told that there is
 2 no explosives dog yet, you say:
 3 "And I appreciate also -- we just need more ambo
 4 staff, paramedics, anyone that we can get hold of,
 5 please."
 6 Do you see that?
 7 A. Yes.
 8 Q. So does it seem that really from that very early stage,
 9 about perhaps 6 or 7 minutes after you've entered the
 10 City Room, you, in common with Sergeant Hare, are keen
 11 for more paramedics and anyone that can help to enter
 12 the room?
 13 A. Yes.
 14 SIR JOHN SAUNDERS: It is to enter the room, is it? Perhaps
 15 you wanted to make it clear about that.
 16 MR GREANEY: Yes.
 17 SIR JOHN SAUNDERS: It's one thing to say: we need more
 18 ambulance staff down at the arena generally; that's one
 19 thing. It's another thing to say: we want more
 20 ambulance staff in the City Room where we also want an
 21 explosives dog to look for any unexploded bombs.
 22 A. Yes.
 23 SIR JOHN SAUNDERS: Which was this as far as you are
 24 concerned?
 25 A. Basically, sir, obviously still a sort of push with

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1 regards to getting an explosives dog so we can make it
 2 work the area, so we can sort of relax to a degree with
 3 regards to there's no explosives in that location for us
 4 to be sort of in immediate threat of. To come to scene.
 5 Yeah, more direct of -- "Come to the City Rooms" would
 6 have been the transmission to make, but I think also
 7 it would be quite clear we're making an assumption.
 8 SIR JOHN SAUNDERS: I just need to know, really, and this is
 9 again no criticism whatsoever, here you have got the
 10 casualties in the City Room, desperately needing help?
 11 A. Yes.
 12 SIR JOHN SAUNDERS: And are you saying over that to the FDO:
 13 get us paramedics, ambulance staff, down here, we need
 14 them now, in the City Room?
 15 A. Yes.
 16 SIR JOHN SAUNDERS: Or are you saying: get them to the
 17 scene, then wait until we've made sure the explosives
 18 dog has found any secondary devices, then we can move
 19 them up?
 20 A. I think realistically to hold people, and that may be at
 21 another RVP, while we're waiting for an explosives dog
 22 would again result in further deaths than what we
 23 unfortunately had.
 24 SIR JOHN SAUNDERS: I just needed to understand what you
 25 were saying, that was all.

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1 A. Basically that the explosives dog -- things have to be
 2 rushed along now and I'm basically emphasising the
 3 urgency for the explosives dog and we also need the
 4 paramedics and ambulance, everyone, to come to scene.
 5 SIR JOHN SAUNDERS: Okay.
 6 A. I appreciate not ideal, but...
 7 MR GREANEY: The chairman is quite right. What you said
 8 isn't -- doesn't specify a location. Let's be clear:
 9 you were in the City Room at the time at which you
 10 broadcast that message and I believe what you're saying
 11 to us is what you felt was necessary was further trained
 12 staff within that room, the City Room?
 13 A. Yes.
 14 Q. Mr Sexton, as we explored with him, replied:
 15 "Yes, I've obviously declared Operation Plato and
 16 I'm trying to get as many NWAS down there as possible
 17 and will try and get the explosives dog."
 18 Did that give you a degree of reassurance that
 19 he was trying to get other paramedics down there?
 20 A. Yes.
 21 Q. Next, entry 3649, timed at 23.00.37. Again, you're
 22 giving an update to Sexton. We don't need to read all
 23 of it out. Can you see that there is a passage which
 24 involves you saying over the radio:
 25 "At the moment, boss, where we are"?

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1 Do you see that?
 2 A. Yes.
 3 Q. "At the moment, boss, where we are, where the casualties
 4 are, we've got enough ARV contingency here and now while
 5 the casualties are being worked on."
 6 Did you mean by that that you had sufficient armed
 7 assets at the scene in order to deal with any active
 8 shooter who might emerge?
 9 A. Yes.
 10 SIR JOHN SAUNDERS: I'm sure it doesn't matter a bit, but it
 11 looks as if that is actually Mr Sexton calling
 12 Mr Richardson from the start of it.
 13 MR GREANEY: It does, yes. Quite right, sir.
 14 Then you also say a little bit further down
 15 something I referred to earlier :
 16 "They're in the main hallway area. However, most of
 17 the people have a number of packages in relation to the
 18 fact that people have been dropping everything and just
 19 running for their lives. We do obviously -- the
 20 explosives dog if you're chasing that one up."
 21 Do you see that?
 22 A. Yes.
 23 Q. So this is you referring to the fact that people have
 24 dropped packages on the floor and emphasising, again,
 25 for the third time, I think, the need for an explosives

1 dog.
 2 Over the page, page 3., entry 4138, 23.04.23.
 3 Do you see that?
 4 A. Yes.
 5 Q. Again, all I'm going to draw attention to is the fact
 6 that you pass a message at that stage:
 7 "Have you got an explosives dog with you?"
 8 And I think you're asking that to a colleague,
 9 Mark Kay; is that correct?
 10 A. Mark Kay being the dog handler.
 11 Q. And he said:
 12 "No, no, mate."
 13 Over the page, again, to page 4, please. At 4574,
 14 23.07.08, I'm not going to go through the location, but
 15 we can see that you have a discussion with Lee Moore and
 16 it is clear that a systematic search of the arena as
 17 a whole is being undertaken by AFOs; is that correct?
 18 A. Yes.
 19 Q. At the very bottom of that page, entry 5510, timed at
 20 23.16.14, we start to get the first references to
 21 a second male. Do you know to what I'm referring?
 22 A. Yes.
 23 Q. Then we go over the page, page 5, entry 5555, the second
 24 entry on that page, 23.16.41. Mr Sexton is asking about
 25 the second male and can you see that he says:

1 "Yes, sorry."
 2 Do you have that?
 3 "Yes, sorry, I do apologise."
 4 A. Yes.
 5 Q. Sexton:
 6 "Yes, sorry, I do apologise. As you can imagine
 7 I've been really busy over this way with phone calls.
 8 What was that last update? Is that someone who we
 9 believe was with the offending male or is it the actual
 10 bomber himself?"
 11 So there is starting to develop a concern that there
 12 is a second male, who may even have a rucksack, that may
 13 have been with the murderer.
 14 A. Yes.
 15 Q. And you replied:
 16 "We have an area sergeant just come up to me who
 17 wants to see the CCTV. I've asked him to hold back for
 18 now because I want to keep [a certain area] clear. He
 19 has basically stated that the second male was in company
 20 with our bomber, shall we say, and we believe he left
 21 the scene when the male blew himself up."
 22 And Mr Sexton asks:
 23 "So we believe there may be a second offender
 24 involved?"
 25 So it seems that the information that Mr Sexton

1 receives about the potential second suspect emanates
 2 in the first instance from you and that you had received
 3 that information from, as you describe it, an area
 4 sergeant?
 5 A. Yes.
 6 Q. Do you know the name of the area sergeant who spoke to
 7 you?
 8 A. No.
 9 Q. Bearing in mind the timing, does it seem likely that
 10 this area sergeant had spoken to you in the City Room?
 11 A. I think that's the one and only conversation I'd had
 12 when he'd approached me.
 13 Q. Can you do your best, bearing in mind the difficulties
 14 with this, of remembering what it was he said to you?
 15 Because we know there was no police officer in the room
 16 at the time of the explosion. What was he saying to
 17 you, do you remember?
 18 A. Predominantly, my attention was drawn to him -- he
 19 didn't come looking for me, he was progressing further
 20 into the arena. That was definitely going to be not --
 21 he wasn't able to do that, in my opinion, due to the
 22 fact that we had specialist firearms officers within the
 23 bowl, we had ARVs in a position for overwatch within the
 24 bowl in case of any further movement.
 25 Q. So he was an unarmed officer?

1 A. He was an unarmed officer who came forward and
 2 he literally approached me when I was between the
 3 City Rooms and the concourse and I stopped him and asked
 4 where he was going.
 5 Q. Are you saying that you didn't want him in the City Room
 6 or you didn't want him to go through into the concourse?
 7 A. I didn't want him to progress through into the arena.
 8 Q. Why was that?
 9 A. Because it hadn't been cleared and there were firearms
 10 officers working there.
 11 Q. And did he explain to you why he wanted to go into the
 12 arena itself?
 13 A. Yes.
 14 Q. What did he say to you?
 15 A. Words to the effect of he wanted to go to the CCTV
 16 office because they were of the opinion that the bomber
 17 was with a second male.
 18 Q. Did you ask him for the basis of his belief or suspicion
 19 that the bomber had been with a second male?
 20 A. I honestly can't recall saying, why do you think that,
 21 but I asked for a description.
 22 Q. And you received, I think, a description -- we get it
 23 from an early entry -- of an Asian male wearing glasses,
 24 a baseball cap and a large black rucksack.
 25 A. Yes.

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1 Q. Obviously this information, the potential of a second
 2 person was information that needed to be passed to the
 3 FDO?
 4 A. Yes, imminently.
 5 Q. At the very bottom of that page, at entry 5912,
 6 23.20.08, you passed a further update to Mr Sexton
 7 having spoken to paramedics. You updated him about the
 8 number of people who were believed to be dead and
 9 injured.
 10 Over the page, please, page 6, entry 6218, 23.23.07.
 11 It's clear from messages that you're passing that the
 12 search is still underway and that concern continues
 13 in relation to the second male that we have just
 14 discussed.
 15 Over the page, page 7, the bottom entry on that
 16 page, line 6846, it's now 23.29.51. Mr Dexter has
 17 arrived at the scene. This is a conversation,
 18 I believe, that is occurring between you and
 19 Mr Dexter -- forgive me, it may not be with you. In
 20 fact, I don't think it is. But Mr Dexter is now, as
 21 we can see, at the scene.
 22 Over the page, 7011. If there was doubt about the
 23 conversation we just went to, there isn't doubt about
 24 this conversation, 7011, timed at 23.31.44. Do you have
 25 that entry?

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1 A. Yes.
 2 Q. Just to give this some context, I'm going to ask that we
 3 see on the screen two images. Mr Lopez will just check
 4 to make sure I'm correct in my recollection. These do
 5 not show the City Room. It's back to the sequence of
 6 events, {INQ035612/336}, first of all, please.
 7 This is an image we looked at earlier. Mr Dexter
 8 has arrived and the two of you are walking away from the
 9 City Room. The time is 23.30.42.
 10 {INQ035612/337}. Again, the same check to make sure
 11 that the City Room is not shown, please.
 12 Mr Dexter is now on his own and walking down the
 13 steps. I think you're just behind him, actually. Yes,
 14 we can see you there.
 15 So you are with Mr Dexter, albeit just behind him,
 16 at the stage that we were looking at in that entry,
 17 7011.
 18 Mr Dexter is recorded as saying to you:
 19 "Are we declaring this warm?"
 20 And you reply:
 21 "Yes."
 22 First of all, should we understand that that is
 23 a reference to zoning?
 24 A. Yes.
 25 Q. This is, I believe, at 23.31, the first recorded

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1 reference anywhere in any recording of any sort about
 2 zoning, which obviously is exactly an hour after the
 3 explosion:
 4 "Are we declaring this warm?"
 5 And you say:
 6 "Yes."
 7 What area did you understand Mr Dexter was referring
 8 to in that question?
 9 A. The City Rooms.
 10 Q. You answer:
 11 "Yes, it's to be declared warm?"
 12 A. Yes.
 13 Q. When you answered that question, were you saying it's
 14 warm for the reason you had identified earlier, namely,
 15 "I think it's hot but I want to treat it as warm", or
 16 did you genuinely by that stage believe that the
 17 City Room was a warm zone?
 18 A. It sort of goes into the conversation I believe I had
 19 transmitting that message to the FDO. As soon as
 20 Chief Inspector Dexter said that to me, that sort of
 21 made me think that that message had gone out. But that
 22 transmission had been heard because he came right up to
 23 me and said, "Is this area warm?", and I'm referring to
 24 the City Rooms.
 25 Q. I see. That is very helpful, but my question was

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1 directed to a slightly different issue, which was we
 2 know that at an earlier stage you thought the City Room
 3 was hot but, for reasons that you've explained clearly,
 4 you decided it ought to be designated as warm.
 5 SIR JOHN SAUNDERS: And I understood your answer to be:
 6 I think this is -- I thought this to be Mr Dexter
 7 feeding back what he'd got from the FDO, which had
 8 originally come from me?
 9 A. From myself, yes, sir.
 10 MR GREANEY: That's what I understood myself. It may be
 11 therefore this question is redundant: at 23.31, did you
 12 genuinely think the City Room was warm as opposed to hot
 13 or did you think it is hot but let's treat it as warm?
 14 A. I think as time elapsed it was going more towards warm
 15 because there was nothing -- there was an emphasis now
 16 on locating this other male, who we believed to be
 17 walking around the city centre and we were obviously --
 18 at that point I don't think the explo dog had attended,
 19 if I'm right in saying.
 20 Q. It had not, no.
 21 A. So the emphasis on that was this is still sort of
 22 overwatch with the firearms officers' security, shall we
 23 say, armed security while unarmed staff are coming in
 24 dealing with the casualties of what degree and when
 25 Chief Inspector Dexter stated, is this warm, I was

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1 taking that as the City Rooms, which was the scene of
 2 the explosion.
 3 SIR JOHN SAUNDERS: This may be being really pedantic, but
 4 actually what he says is, "Are we declaring this warm?"
 5 So rather than being, "Is this the one you declared
 6 warm?", or, "We have declared warm", he's actually
 7 saying, "Are we declaring this warm?", which seems to
 8 be, "This is what we're going to do now", but maybe
 9 that's not how you saw it at the time.
 10 A. I honestly can't say I remember that added sort of
 11 question, sir. I understand what you mean and I could
 12 sort of take that in that context also.
 13 SIR JOHN SAUNDERS: Okay.
 14 A. But at that moment in time, it's not something that --
 15 for me he was saying, "Is this warm?", with regards to
 16 what my message initially was, which again I understand
 17 hasn't been transmitted.
 18 MR GREANEY: So I believe I've understood you, that I think
 19 you are saying you recall this short conversation but to
 20 your mind it was confirmatory?
 21 A. Yes.
 22 Q. It was confirming the fact that your earlier message had
 23 passed?
 24 A. That's how I took it.
 25 Q. 7053 now, 23.32.09. We can summarise this. There was

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1 still concern about the second male. It appears that
 2 he had been lost around the area of the cathedral and
 3 armed officers from a different force area who were
 4 nearby were being deployed to look for him.
 5 We can move on to page 10 to answer a question that
 6 you posed of me a moment ago. Entry 8078, 23.43.09.
 7 Mojo has now arrived because we can see you, four lines
 8 up from the bottom, saying over the radio:
 9 "I'm outside Victoria Street entrance."
 10 And you had indeed gone outside for a period of
 11 time:
 12 "I've got an explosive dog from BTP."
 13 So that's the first reference anywhere to the
 14 arrival of the explosive dog, we know Mojo, timed at
 15 23.43; do you see that?
 16 A. Yes.
 17 Q. You were studying that. Was there any other part of
 18 that you wanted to draw to our attention?
 19 A. I'm of the opinion that I wasn't outside Victoria Street
 20 at that point, I was inside and I saw the explo dog
 21 walking either over the bridge towards the City Rooms,
 22 as I was back in the City Rooms by the concourse, or
 23 he was walking across the City Rooms itself. I don't
 24 think ...
 25 Q. Thank you very much for drawing that to our attention.

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1 I won't take up your time checking it but we will in due
 2 course check your location. I had thought you were
 3 outside. We certainly see you outside at some stage
 4 shortly after Mr Dexter has --
 5 SIR JOHN SAUNDERS: You certainly say it. You actually say,
 6 "I'm outside the Victoria Street entrance now".
 7 A. Again, it's most probably a perfect example, sir, of
 8 perceptual distortion. I am sure I had contact with
 9 that many people, I had a lot of conversations direct
 10 and over the radio. As I said in my statement, I can't
 11 be as accurate, 100% accurate, due to the circumstances
 12 and the environment.
 13 MR GREANEY: No, we'll all understand that.
 14 So as we get nearer, at the bottom of that page, to
 15 quarter to midnight, we can see that the searching is
 16 continuing, you are updating Mr Dexter about various
 17 things. By that stage, quarter to midnight, Mr Dexter
 18 has been there for about 20 minutes. What did you
 19 understand his role to be?
 20 A. He was now taking over and sort of my area of
 21 responsibility was sort of ebbing towards Mr Dexter as
 22 the ground TFC and rightly so. He comes to scene, he's
 23 what we've got. He will be updated by relevant command
 24 structures within all services who have attended and he
 25 would then separate himself and go towards an FCP.

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1 I don't even think at that time I was thinking FCP, it
 2 was just he needs to be away from the carnage,
 3 basically .
 4 Q. So did you understand that he had arrived and he had
 5 taken away from you, for understandable reasons, a good
 6 deal of your command responsibility?
 7 A. Yes.
 8 Q. He's the ground—assigned tactical firearms commander.
 9 Did you therefore understand that at the scene, he was
 10 in overall control and command of the armed assets?
 11 A. He would be and he's also in control of other resources,
 12 other emergency services who attend. He's sort of...
 13 He will orchestrate where he wants and what he wants
 14 them to do. I will still — if there's any further sort
 15 of role for us to perform or tactic to implement,
 16 I would still be the firearms commander for that.
 17 Q. Before I ask my next question I want to make sure that
 18 you are qualified to answer it, if I can put it that
 19 way. Do you as a matter of experience or training have
 20 knowledge of whether the ground—assigned tactical
 21 firearms commander should have responsibility only for
 22 the firearms assets or for the firearms assets and the
 23 unarmed assets?
 24 A. I'm of the opinion firearms and the other assets who
 25 attend, other emergency services who attend.

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1 Q. From where does that understanding of yours come?
 2 A. I think it's with regards to JESIP, sort of the joint
 3 interoperability and the command structure for that.
 4 Q. So you think that the answer to the question I posed
 5 should be found somewhere in JESIP?
 6 A. I'm of that opinion.
 7 SIR JOHN SAUNDERS: So you have experience of both Liverpool
 8 and Manchester?
 9 A. Again, with the timescale that I did in Merseyside, I've
 10 obviously conducted more firearms deployments than what
 11 I did in Manchester, but none to this scale. There were
 12 some incidents that had taken place where the ground
 13 commander would turn up, I would be briefed by the
 14 ground commander with what he wanted, and that was
 15 a blatant, obvious tactic to be implemented. He's in
 16 overall command of the firearms unit but I am still sort
 17 of the control measure for the firearms officers to
 18 formulate the plan that the ground commander has, if
 19 that makes sense.
 20 SIR JOHN SAUNDERS: Okay.
 21 MR GREANEY: In relation to the period that follows quarter
 22 to midnight, we can deal with it by way of summary. The
 23 searching of the arena continued, did it not?
 24 A. Yes.
 25 Q. The search for the second male continued; is that also

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1 correct?
 2 A. Yes.
 3 Q. A decision was made to deploy armed assets to hospitals
 4 in the Greater Manchester area?
 5 A. Yes.
 6 Q. And a concern developed about events at a hospital in
 7 Oldham, that also had to be dealt with from a firearms
 8 point of view, albeit it came to nothing?
 9 A. Yes.
 10 Q. In the end, were you to remain on duty and at the scene
 11 until about 4 o'clock the next morning?
 12 A. Yes.
 13 MR GREANEY: Mr Richardson, thank you very much indeed for
 14 answering my questions. As you will appreciate, there
 15 will be or may well be questions that others have.
 16 First of all, I'm going to ask Mr Wood, who represents
 17 Mr Sexton and Mr Dexter, whether he has questions.
 18 Sir, I can see the time. Can I suggest that we do
 19 sit on until about half past?
 20 SIR JOHN SAUNDERS: Is that all right with everybody?
 21 Thank you.
 22 Questions from MR WOOD
 23 MR WOOD: I hope not to take very long.
 24 PC Richardson, I want to deal firstly and briefly
 25 with the discussion about zoning or the transmission

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1 about zoning that you say you made to the FDO at about
 2 10.48. All right?
 3 A. Yes.
 4 Q. You have given the chair in this inquiry a number of
 5 possible reasons as to why that communication may not
 6 have been transmitted on your radio; is that right?
 7 A. Yes.
 8 Q. That discussion and that decision, would you agree, was
 9 a significant one operationally?
 10 A. Yes.
 11 Q. With potentially very important consequences about who
 12 was to be deployed where; do you agree?
 13 A. Yes.
 14 Q. If the FDO had heard that transmission from you, you
 15 would expect him to have acknowledged it, wouldn't you?
 16 A. I don't think every transmission would be acknowledged
 17 from the FDO because he was overwhelmed. Without
 18 obviously knowing the information now that I know, with
 19 the amount of work that he was expected to perform,
 20 I think at that time it was a clear understanding that
 21 he would be excessively overworked.
 22 Q. Absolutely. But if you, as the OFC, had sent him
 23 a communication of that importance, he as the interim
 24 TFC would be expected to acknowledge it and possibly
 25 discuss it with you; do you agree?

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1 A. Again, depending on what he was doing at that time, and
 2 obviously circumstances in the arena continuing, other
 3 conversations going on, I can't say. In an ideal world
 4 yes, but it wasn't an ideal world at that time.
 5 Q. No. Certainly Mr Greaney's taken you through the
 6 schedule of audio transmissions and there doesn't appear
 7 to be any evidence that that transmission was made from
 8 you to him. Do you agree with that?
 9 A. Yes.
 10 Q. Two points just to expand on this area, please. Because
 11 it is such an important decision, would you ordinarily
 12 want to have documented that?
 13 A. With regards to the OFC's role, again in an ideal world,
 14 and the command structure for the firearms unit, but
 15 I don't jump out of my car with a gun in one hand and
 16 a clipboard in the other.
 17 Q. Of course not.
 18 A. Obviously, body-worn video, which has been alluded to,
 19 is an ideal way of understanding the communication and
 20 movements of a firearms officer. Predominantly we rely
 21 on transmissions. Again, within the audio, there's
 22 conversations in there that I genuinely don't recall
 23 saying due to the surroundings that I was in. Others,
 24 more pertinent points, I do remember because they are
 25 pertinent points.

1 Q. Is it the kind of point that you would write, for
 2 example, in notes after the event, for example in your
 3 pocket notebook?
 4 A. Again, I did make a pocket notebook entry afterwards and
 5 even reading that, some of it is out of context. But
 6 we were also encouraged not to make a full entry in the
 7 pocket notebook.
 8 Q. I just want to be clear about this, so you've got the
 9 chance to explain it. You agree you made some notes in
 10 a pocket notebook?
 11 A. Yes.
 12 Q. And have you looked at that recently?
 13 A. Yes.
 14 Q. We can put it on the screen if we need to, but I think
 15 you're agreeing with me that that discussion with the
 16 FDO and the approach taken to zoning is not included in
 17 your pocket notebook, is it?
 18 A. Many conversations aren't included in the pocket
 19 notebook.
 20 Q. Can you help the chair with why a conversation of that
 21 importance is not included in the pocket notebook that
 22 you wrote after the event?
 23 A. Like as I have just stated, many conversations weren't
 24 in my pocket notebook, so that's one of them. There's
 25 no other reason. It was brief notes to put myself

1 in that place at that time, which was obviously recorded
 2 later on, some 18 months or 21 months later, with
 3 a statement.
 4 Q. Your witness statement was written in, I think, January
 5 of 2019, that's absolutely right, but the pocket
 6 notebook was made — the notes were made
 7 contemporaneously, weren't they?
 8 A. Some days later. I can't tell you when. But again, the
 9 information in that pocket notebook again is out of
 10 context.
 11 Q. And that's your explanation for why a decision of that
 12 magnitude is not noted; is that right?
 13 A. Because I was of the opinion that the fact that those
 14 transmissions were received, they would be recorded over
 15 the air and that's what predominantly I would rely on.
 16 If we would have worn body-worn video at that time and
 17 if it wasn't said, then that would be quite clear that
 18 it wasn't said at that time. Again, explaining
 19 perceptual distortion, body-worn video is something now
 20 that firearms officers wear and it is something that we
 21 can refer back to. It is hugely beneficial but at that
 22 time it wasn't the case.
 23 Q. Second point, please, following on from this. The
 24 decision or the discussion you've described or the
 25 attempt to transmit takes place at about 10.48, as

1 I think we established through Mr Greaney, shortly after
 2 you've gone through the City Room and swept it for the
 3 first time. Does that sound about right?
 4 A. Yes.
 5 Q. And the reason for thinking it hot but treating it as
 6 warm pragmatically you described in your witness
 7 statement — and it's paragraph 52 if you want to look
 8 at it. What you said was:
 9 "It was not feasible to enforce the hot zone and
 10 evacuate all unarmed first responders as this would have
 11 left multiple seriously injured casualties with no
 12 treatment or evacuation. Many more casualties could
 13 have died from their injuries. The pragmatic approach
 14 was to treat the City Room as warm."
 15 And you're not getting any criticism from me at all
 16 for a pragmatic approach to treating casualties in that
 17 room. All right? But if you had made the decision to
 18 treat the City Room as warm as opposed to hot at 10.48,
 19 logically that would also have required unarmed police
 20 officers, for example, to withdraw, wouldn't it?
 21 A. Well, they shouldn't be there.
 22 Q. No. If you took the decision to treat the room as warm
 23 at that point for practical purposes, why didn't you
 24 then tell those unarmed police officers to leave,
 25 because they shouldn't be there?

1 A. Basically, continuous throughout the night I was
 2 assessing the dynamic risk assessments and I would be
 3 in the box now explaining why so many people died and
 4 why didn't I allow emergency services to come in.
 5 Sometimes there is a platform of a tactic and you've got
 6 to go -- sort of what the paper document states how you
 7 address things or how you perform in an environment,
 8 sometimes you have to adapt and think out of the box.
 9 That is throughout the policing world, that's throughout
 10 the firearms world.
 11 Q. Constable, I am not, I hope you understand, remotely
 12 criticising you for leaving them in place. Do you agree
 13 that if you had made the decision to treat the room as
 14 warm, strictly you should have told them to leave at
 15 that point?
 16 A. Yes.
 17 Q. All right. I'll move on now, if I may, to a different
 18 topic, which is the --
 19 SIR JOHN SAUNDERS: The reality is, for pragmatic reasons,
 20 for the people who were already there helping people
 21 in the City Room, you're treating it as a cold zone?
 22 A. It was never a cold zone, sir. But people were there
 23 and I understood at that time they had come from
 24 Victoria Station. I'm never going to tell them to leave
 25 and then watch people die because at that time there was

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1 only four firearms officers.
 2 SIR JOHN SAUNDERS: And people were still coming into the
 3 City Room to help?
 4 A. I'm making the assumption that there was and I was
 5 asking for people. However, I wasn't actively asking as
 6 much until we cleared what area we could and with the
 7 phrase I made before of spiky bubble, basically the
 8 armed protection because you are to hit the working
 9 strategy with regards to the briefing that I alluded to,
 10 you are there to maximise the safety of unarmed staff
 11 and you're minimising the risk towards anyone of -- the
 12 public.
 13 MR WOOD: I want to turn now, please, with your leave, to
 14 the arrival of Chief Inspector Dexter, all right?
 15 A. Yes.
 16 Q. Can we look on screen, please, at the transcript of his
 17 dictaphone. {INQ025409/2}, please.
 18 Forgive me, this is a slightly different version of
 19 the transcript to the one I've been working with.
 20 In the middle of the page, we can see an entry from
 21 Dexter:
 22 "Where is the OFC gone? If we're happy this is
 23 secure from an armed point of view, I think we need to
 24 move out, so OFC-wise we need to move out and put
 25 a broader armed cordon on."

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1 Do you see that?
 2 A. Yes.
 3 Q. Then an answer comes:
 4 "Just at the moment I'm staying here because in case
 5 anyone comes back if we've got people coming in and
 6 out -- I was just saying here for now."
 7 Do you see that?
 8 A. Yes.
 9 Q. It says "unknown male" on the transcript. But is that
 10 in fact you as the OFC answering Chief Inspector Dexter?
 11 A. I can't answer that.
 12 Q. All right. Do you remember that he had to come and find
 13 you in the City Room because that's where you had been
 14 ever since you had gone in there when you arrived at the
 15 scene?
 16 A. Chief Inspector Dexter came into the City Rooms and
 17 I was aware of this because he was shouting, "OFC, OFC",
 18 all over the City Rooms. He didn't contact me via the
 19 radio. He was shouting it to the point, I think, that
 20 someone made me aware again.
 21 Q. So he came into the City Room, looking for you.
 22 Presumably because for whatever reason he didn't know
 23 where you were; is that right?
 24 A. If he was shouting for me, then he most probably didn't
 25 know where I was.

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1 Q. All right. Just in terms of -- I want to develop on
 2 that point some of questions Mr Greaney asked you about
 3 your responsibilities as OFC up to that time. All
 4 right? You were taken to some passages from JOPs and
 5 I think you agreed with Mr Greaney that for the purposes
 6 that you were taken to it, you were the or an on-scene
 7 police commander. Is that right?
 8 A. Operational firearms commander.
 9 Q. Can we have a look please again at JOPs. It's
 10 {INQ008372/11}.
 11 Part of paragraph 4.4 is talking about
 12 communications and what it says is this:
 13 "During the marauding phase of an attack, the
 14 information and intelligence picture is likely to be
 15 very confused. During this phase, the TFC based in the
 16 force control/operations room is the person most likely
 17 to be best placed to make an effective assessment of the
 18 location of the attacks and location of the terrorists.
 19 Therefore a clear command protocol and effective
 20 communications should be established between the
 21 control/operations room-based TFC and the police
 22 on-scene commander."
 23 And for the purposes of identifying where the
 24 terrorists are and where the risks is, that person for
 25 these purposes is you, officer, isn't it?

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1 A. No.
 2 Q. You don't think so?
 3 A. No.
 4 Q. All right:
 5 "The limits of exploitation/determining the zones
 6 should be set by the police commander with the most
 7 up-to-date information in respect of the location of the
 8 threat. This will assist in ensuring that the zones are
 9 designated and assets deployed accordingly. It must be
 10 recognised that the decision to designate an area as
 11 a warm zone requires continual assessment based on the
 12 threat."
 13 Are you saying that the police commander with the
 14 most up-to-date information in respect to the location
 15 of the threat is not you?
 16 A. I'm saying basically I would not be nominated -- I would
 17 not be nominating an RVP, an FCP, I would not be taking
 18 control of the Ambulance Service, the Fire Brigade if
 19 they attended, or paramedics or the HART team. I would
 20 be controlling and commanding the operational firearms
 21 side. Granted, initially at that time, when I got to
 22 scene and I saw what was going on within the City Rooms,
 23 I was predominantly the first command structure, but
 24 still of the firearms side, I was looking for
 25 supervisors, for command structures from what uniforms

1 I saw on the other side of the City Rooms. None were
 2 present. I then continued with my update to the FDO.
 3 Q. Just to finish the point of the paragraph, of this
 4 section, it also says, doesn't it:
 5 "It should also be noted that in the initial
 6 response to an MTFA the initial police on-scene
 7 commander may not be a TFC. Where this is the case they
 8 will work under the command of the TFC located at the
 9 control operations room until a TFC arrives and assumes
 10 the role of police on-scene commander. Where a TFC does
 11 assume the role of the police on-scene commander,
 12 a review of the command protocol of the control
 13 operations room-based TFC should be undertaken?"
 14 If you were the on-scene commander for these
 15 purposes before being relieved by the ground-assigned
 16 TFC -- we can look at it, it's on page 12 to begin with,
 17 paragraph 4.8 -- it would have been your responsibility
 18 to set an FCP, a forward command point; do you accept
 19 that?
 20 A. No.
 21 Q. Can we just look at that, please, page 12,
 22 paragraph 4.8. It does say there, doesn't it:
 23 "The police on-scene commander in consultation with
 24 FRS and ambulance counterparts is responsible for
 25 identifying a suitable FCP for specialist emergency

1 personnel"?
 2 Right? In fairness, paragraph 4.9 makes it -- just
 3 at the bottom of that page, I think, makes it clear that
 4 owing to time constraints it may not always be possible
 5 to have an FCP established immediately. But you don't
 6 accept that that -- that you had any responsibility for
 7 setting an FCP?
 8 A. I would say that's where the documentation is flawed,
 9 which is most probably why elements of it have been
 10 changed. At that time it was not for me to nominate
 11 an FCP, an RVP. I am the command structure as stated in
 12 my statement and previous training, previous policies
 13 in the firearms world does not put me in command of the
 14 overall -- the command structure of the overall
 15 resources that are coming to scene and I'm not the one
 16 nominating an FCP.
 17 SIR JOHN SAUNDERS: Would you be in a position to do that?
 18 A. Not really, sir.
 19 SIR JOHN SAUNDERS: I mean, you're working in the City Room.
 20 You're not going to set up an FCP in the City Room,
 21 presumably?
 22 A. Not really, sir, no. And also with regards to my time
 23 within Manchester, I was most probably quite
 24 geographically challenged with regards to nominating
 25 streets I didn't know.

1 SIR JOHN SAUNDERS: We understand you don't know the area as
 2 well.
 3 A. I didn't know it that well at all so obviously if
 4 someone -- and this is not passing the buck to anyone
 5 else within the team -- if someone would have said to
 6 me, "Nominate an RVP and give me the street furthest
 7 away out of line of sight of the building for safety
 8 reasons", then it's not something I would shy away from,
 9 I would say yeah and recommend a nomination of an RVP
 10 but it's not predominantly what I would do when you've
 11 got officers in a bigger command role with potentially
 12 a mapping system in front of them.
 13 SIR JOHN SAUNDERS: Thank you.
 14 MR WOOD: Just one more document I want to put forward if
 15 I may, please. Can we have on the screen, please,
 16 INQ029178/1. It should be what we've been referring to
 17 colloquially, I think, as the Whittle plan.
 18 The date on this -- this is the "Initial response to
 19 a marauding terrorist firearms attack by the north-west
 20 region". The date on this, PC Richardson, at the
 21 bottom, you will see, is 4 May 2017. In fairness to
 22 you, is this a document which, on 22 May, you think you
 23 would have seen?
 24 A. I don't recall seeing this document.
 25 Q. All right. Can we just look at {INQ029178/4} of it,

1 please. This is a list of the initial actions by the
 2 host FIM or FDO. At the very bottom of the page,
 3 can you see there the entry:
 4 "OFC to remain at the RVP/FCP until relieved by
 5 ground—assigned TFC?"
 6 Do you see that?
 7 A. Yes.
 8 Q. Was that your understanding on the night of what you
 9 should have done as an OFC?
 10 A. That's never been my understanding throughout my 14—plus
 11 years of firearms training or firearms operations.
 12 We would never — it's never been practised, it's never
 13 been encouraged, and it's never been trained for an OFC
 14 to leave his team and if I would have done that, it
 15 would have depleted the team in the City Rooms. If
 16 I would have gone towards an RVP or an FCP, I would have
 17 needed another firearms officers with me, which would
 18 have meant only two firearms officers were going into
 19 the scene at the point where I entered the arena. So
 20 you're depleting your team by half at that point, which
 21 is never a consideration because you're still an
 22 operational firearms commander, you are still an
 23 operational firearms officer .
 24 Q. There may well be a debate about the effectiveness of
 25 the terminology of these policies , officer . But that

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1 direction there, that the OFC remains at the RVP/FCP, is
 2 consistent, isn't it, with you being the on—scene
 3 commander before the ground—assigned arrives, with the
 4 firearms understanding and knowledge of how to deploy
 5 the assets who communicates with the other agencies?
 6 A. No, I totally disagree with that and I disagree with,
 7 obviously, the document stating that. As I've just
 8 stated, it's never practised, never trained and never
 9 encouraged to do such a thing. And again, the OFC's
 10 role is to be fully available for his officers under his
 11 command and it's also to be the eyes and ears of the
 12 FDO. How am I to do that if I'm some distance away?
 13 SIR JOHN SAUNDERS: On the other hand, once you've been in
 14 there and made sure that there is no marauding firearms
 15 terrorist around, somebody needs to be telling ambulance
 16 and fire, "Yes, it's safe to go in these places". If
 17 it's not you, who is it going to be?
 18 A. In a calmer environment these resources from emergency
 19 services would go to an RVP and once it's pretty much
 20 done and dusted, in layman's terms, at the scene,
 21 I would liaise with the ambulance staff or other area
 22 unarmed staff from the police.
 23 SIR JOHN SAUNDERS: Do you anticipate at some stage going to
 24 the RVP?
 25 A. No. No, sir.

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1 SIR JOHN SAUNDERS: Who is going to tell them, if you're the
 2 firearms commander, "We've now done a sweep, it's clear
 3 for you to go in there"?
 4 A. I think this is also, if I may say so, a negative effect
 5 with regards to only being issued with one radio, again
 6 going — obviously, it wasn't the case on the night, but
 7 going back to previous experiences and also what I'm
 8 doing now with Merseyside, we use two radios. We will
 9 have one radio with the area channel and we don't have
 10 to totally sort of pester the FIM. We can have
 11 communication with operators as well who will also take
 12 an element of stress away from the force incident
 13 manager or the FDO in this case.
 14 SIR JOHN SAUNDERS: On this particular night the only way
 15 that the Ambulance Service and the fire were going to
 16 get to know we, the armed officers, have cleared the
 17 scene, we are satisfied there is no armed terrorist
 18 around, was for you to tell the FDO and the FDO then to
 19 tell the ambulance and the fire; is that right?
 20 A. Yes, sir .
 21 MR WOOD: Thank you, sir. I have no more questions.
 22 SIR JOHN SAUNDERS: Thank you very much.
 23 MR GREANEY: Thank you, Mr Wood. I know Mr Smith at one
 24 stage had a small number of questions. I don't know
 25 whether we can deal with those if he continues to wish

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1 to ask them before lunch. I'll ask him.
 2 MR SMITH: Sir, thank you. Mr Greaney has dealt with the
 3 issue that we raised in the Rule 10 notice and we have
 4 no questions. Thank you.
 5 MR GREANEY: Thank you, Mr Smith.
 6 Sir, in those circumstances, it would be convenient
 7 to break for lunch and then, when we resume, we will
 8 have Mr Weatherby's questions on behalf of the families.
 9 SIR JOHN SAUNDERS: Thank you. We'll break for an hour.
 10 2.30. Is that all right? Thank you.
 11 (1.30 pm)
 12 (The lunch adjournment)
 13 (2.30 pm)
 14 MR GREANEY: Sir, good afternoon. Next, Mr Weatherby.
 15 Questions from MR WEATHERBY
 16 MR WEATHERBY: Thank you very much. Mr Richardson, can you
 17 see and hear me?
 18 A. Yes.
 19 Q. Thank you. I'm asking you some questions on behalf of
 20 the families and can I say at the outset that I don't
 21 anticipate that any of my questions will imply any
 22 criticism of you or your actions; I just need you to see
 23 whether you can help us with a few more details.
 24 A. Okay.
 25 Q. I think it would be right also to start by saying that

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1 the families recognise the difficult and dangerous job
 2 that you do and the fact that you went as swiftly as you
 3 could into an area where you were unsure as to what the
 4 threat was, and also that you obviously had casualties
 5 and their treatment at the forefront of your mind. So
 6 thank you for that. Okay?
 7 A. Yes, thank you.
 8 Q. Can I start just with a few questions about training.
 9 Of course, your involvement was at the operational level
 10 as the OFC, so you would have an understanding of the
 11 Plato policy and plan from that point of view, wouldn't
 12 you?
 13 A. Not the whole document, but the parts which are
 14 pertinent to me.
 15 Q. That's what I meant. So you would have an understanding
 16 of the bits that really were ones that would affect your
 17 role?
 18 A. Yes.
 19 Q. A point of detail that might not matter too much, but
 20 you were recently shown on screen a version of the Plato
 21 plan that we know was emailed out to some commanders on
 22 12 May, so 10 days before this outrage occurred. Have
 23 I understood your evidence correctly that you're fairly
 24 sure you didn't see that version of the Plato plan
 25 before 22 May?

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1 A. Yes, I can't account — I can't be 100% sure that I did
 2 read it, but I'm led to believe I was sent it via my GMP
 3 e-mail address.
 4 Q. You certainly hadn't received any training on it by that
 5 point, had you?
 6 A. No.
 7 Q. Okay. You would have understood at the time, of course,
 8 that a declaration of Plato triggered an urgent,
 9 decisive action firearms response; yes?
 10 A. Yes.
 11 Q. And concurrently it would trigger a multi-agency relief
 12 response so that other agencies could be deployed
 13 straightaway, once any immediate threat had been
 14 neutralised?
 15 A. Yes.
 16 Q. And you were responsible at the scene for the decisive
 17 action part of that as the OFC; yes?
 18 A. With regard to the firearms assets, yes.
 19 Q. Yes, that's right. But it wasn't your role, and
 20 it would be unrealistic for it to have been, so for you
 21 to also command the other emergency service response?
 22 A. Yes.
 23 Q. So you would inform that response by your communications
 24 to the FDO with the situational awareness, but it was
 25 very clearly for him to deal with that side of the Plato

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1 response?
 2 A. Yes.
 3 Q. Dealing with Plato, the normal firearms policing default
 4 position on either a spontaneous or a planned operation
 5 is to contain and negotiate, isn't it?
 6 A. Yes.
 7 Q. In Plato, where there is in your words a perceived
 8 terrorist threat, there's a presumption in the plan that
 9 there may be an active terrorist intent on taking life?
 10 A. Yes.
 11 Q. And therefore the default position changes to locate and
 12 neutralise?
 13 A. Yes.
 14 Q. And that in short order may mean that you're called upon
 15 to shoot them?
 16 A. Yes.
 17 Q. That's the fundamental difference between the two
 18 operation approaches, the non-terrorist approach and the
 19 terrorist approach; is that right?
 20 A. Yes.
 21 Q. Moving to the night in question, you have given evidence
 22 that you thought that Plato had been declared before you
 23 entered the arena complex; yes?
 24 A. Yes.
 25 Q. We've heard other evidence and seen transcripts, and

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1 of course it's ultimately a matter for the chair, but
 2 that evidence suggests that in fact Plato wasn't
 3 declared until 22.47, and that would be the time
 4 probably shortly after you'd actually entered the
 5 City Room. You're aware of that, aren't you?
 6 A. I'm led to believe that that's the opinion, but
 7 I respectfully disagree. The fact that that wasn't the
 8 case —
 9 Q. Yes. I'm not going to ask you any more questions about
 10 that, apart from this: given that there were reports of
 11 a bomb and gunshots, whether or not you're correct that
 12 the declaration was earlier than 22.47, it's right,
 13 isn't it, that it would have been appropriate for it to
 14 have been declared at a time before you entered the
 15 arena?
 16 A. Yes.
 17 Q. Because the policy is to declare early to ensure as
 18 rapid a response as possible but with everybody warned
 19 about the possible lethal threat that we've just
 20 discussed?
 21 A. Yes.
 22 Q. And if it turns out to be an error, frankly nothing's
 23 lost, it can be rescinded?
 24 A. Yes.
 25 Q. Just one further point on that. Once you'd got into the

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1 arena, again whether or not the declaration had occurred
 2 by that point, you became aware because of smell that
 3 this was a very serious issue, you could smell that
 4 there'd been an explosion. And certainly at that point,
 5 you briefed the officers under your command to go in to
 6 advanced mode. You were assuming at that point that
 7 there may be an active shooter. Have I understood your
 8 evidence correctly?
 9 A. Yes.
 10 Q. So you were indicating as the operational commander to
 11 your officers that you were commanding very clearly that
 12 there may be a need for decisive action rather than
 13 contain and negotiate?
 14 A. Yes.
 15 Q. And whatever the rights and wrongs of when the
 16 declaration of Plato was, this was you developing the
 17 operational plan as you went along?
 18 A. Yes.
 19 Q. Can I then ask you about the tactical plan. The
 20 evidence you've given so far was that you did not
 21 receive any tactical plan or working strategy from the
 22 FDO before or as you entered into the arena; yes?
 23 A. Yes.
 24 Q. If you had, that tactical plan or working strategy would
 25 have been communicated over the firearms channel?

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1 A. Yes.
 2 Q. Apart from the reports of an explosion and gunshots,
 3 possible gunshots, there was no further information that
 4 was given to you and I think you described that as being
 5 unusual; is that right?
 6 A. It would be unusual for normal deployments, but with
 7 regards to what the incident was, a terrorist attack,
 8 the words what were given, I am of the opinion were,
 9 in the immediacy of us to get into the building, was
 10 accurate enough.
 11 Q. Okay. Even where the information is as sparse as that,
 12 I just want to put to you, suggest to you, what
 13 a tactical plan might have looked like just so we can
 14 all understand what was missing, if you like.
 15 So, for example, would you expect on a deployment
 16 like this that a working strategy or a tactical plan
 17 would inform you to treat the scene as a possible or
 18 probable terrorist gun and bomb attack?
 19 A. Sorry, can you just repeat that one, please?
 20 Q. Yes. If the FDO had given you a tactical plan or given
 21 you a working strategy, I just want to explore with you
 22 how that might have sounded, what that might have
 23 included.
 24 First of all, I'm suggesting to you that the FDO
 25 would have told you to treat the scene as a possible, or

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1 maybe even a probable, terrorist gun and bomb attack on
 2 what was known.
 3 A. He wouldn't have to say those words. It'd be
 4 (overspeaking) --
 5 Q. -- okay, yes.
 6 A. -- with regards to information about the explosion and
 7 shots being fired, I'm not speaking for other colleagues
 8 who were on duty that night, but for myself it
 9 definitely wasn't the act of a standard firearms
 10 criminal, it was something more to it.
 11 Q. Yes, absolutely.
 12 A. It didn't surprise me when Plato was called.
 13 Q. Okay. You would have expected Plato to have been called
 14 and then for the FDO to have given you a tactical plan
 15 or a working strategy?
 16 A. I don't know whether I'm dancing around the answer here.
 17 I think, again due to the immediate threat to life to
 18 the general public inside, he's put it quite clear and
 19 as quickly as he can and everyone within the firearms
 20 team does the same training as I do. The only added
 21 extra is I do a little bit of command training.
 22 Tactical-wise, we do exactly the same and as soon as he
 23 said "emergency search", I know why we are conducting
 24 the emergency search and the Plato is to (inaudible:
 25 distorted) an active terrorist (inaudible: distorted)

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1 presenting a threat to life (overspeaking) -- sorry,
 2 it would be neutralised if we come across that.
 3 Q. Yes, it's my fault, sorry. I wasn't letting you finish.
 4 You would know then, on a declaration of Plato, that
 5 it was a -- and the information that you'd been given
 6 that there was certainly a possibility of a terrorist
 7 gun and bomb attack and that would mean that your role
 8 was to locate and neutralise, using decisive action, if
 9 necessary?
 10 A. Yes.
 11 Q. Would you know or would you expect the working strategy
 12 to include that you should sweep the area for active
 13 shooters and look for secondary devices?
 14 A. I think that with regards to the building that we went
 15 into and the scene that we come to is unique, it's not
 16 something -- you could do all the training you can,
 17 we will never do any training which will replicate that
 18 night. So obviously, at that point, we had to secure
 19 the area, we had to sweep the blast site for obviously
 20 what was -- what we describe as like a sleeper,
 21 basically someone who's waiting to basically put
 22 a secondary attack, shall we say, whether it be by
 23 a firearm or whether it be by an IED.
 24 Q. So that would be a sensible matter (overspeaking) for
 25 you to do. What I'm trying to get at is that we've

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1 heard about this idea of a tactical plan or a working
 2 strategy from the FDO. I'm just trying to get from you
 3 what you would have expected the FDO to have said --
 4 A. (Overspeaking) overall working strategy, the overall
 5 threat assessment is high and the -- can I just refer
 6 back to my paper, my document?
 7 Q. Of course.
 8 (Pause)
 9 A. I did have it.
 10 (Pause)
 11 SIR JOHN SAUNDERS: I think we've got some more if you've
 12 lost it.
 13 A. Sorry about that.
 14 SIR JOHN SAUNDERS: That's all right.
 15 A. Basically I would expect them to have said that the
 16 overall threat assessment was high due to the
 17 information that he'd been receiving. I wouldn't expect
 18 him to through the rest of the threat assessment for
 19 every sort of person or people that could be in the
 20 close proximity. The overall working strategy is to
 21 minimise the risk to the public and maximise safety of
 22 unarmed officers. Then we would fall into that working
 23 strategy also, but we'd be more towards (inaudible:
 24 distorted) and anyone, obviously, who's committing
 25 terrorist activity would be at the very bottom of the

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1 working strategy because they're going to be neutralised
 2 to stop that (overspeaking) life continue.
 3 MR WEATHERBY: So the working strategy would include
 4 neutralising the threat and then deploying to protect
 5 unarmed officers and presumably other emergency services
 6 personnel?
 7 A. Yes.
 8 Q. Would you expect that to be said by the FDO or not?
 9 A. A normal deployment would have that in, in something not
 10 as stressful as this, but due to, again, the type of
 11 incident that it was, I can understand and I wouldn't
 12 delay us -- the firearms officers or myself going in
 13 because the FDO hadn't told me what that was. I've been
 14 doing this for long enough and the colleagues I was
 15 doing it with have been doing it for long enough where
 16 they (overspeaking).
 17 Q. I have no doubt about that. I'm just trying to get
 18 through you what you would expect from the FDO as
 19 a prompt working strategy, but I think I've taken that
 20 as far as I can.
 21 Working from the information that you'd been given,
 22 it was then your role to give direction to your firearms
 23 officers that were under your command. We know that
 24 a number of firearms officers deployed quickly to the
 25 scene and they came to the City Room from different

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1 directions. Was that by a plan or was that just how it
 2 happened given the paucity of information that you had?
 3 A. That's basically just how it happened due to the fact
 4 that we weren't told what aspect to go to, to the arena,
 5 we were just basically told, "All ARVs go to the arena",
 6 and you're coming from all four corners of the force,
 7 basically, to that location. Naturally we will just be
 8 around that structure.
 9 Q. Yes. So in terms of your role as the commander, once
 10 you'd realised that there was an explosion and it wasn't
 11 a false alarm, you clicked the officers around you into
 12 advanced mode as in, get ready, we might have to engage
 13 here. Then, once you'd made it to the scene, you then
 14 deployed them to guard the concourse whilst you and
 15 Mr Lewis went into the City Room and then, once you'd
 16 swept the City Room, am I right that you then deployed
 17 armed officers to safeguard the City Room because it was
 18 a scene which included many casualties?
 19 A. Yes.
 20 Q. So that's the firearms command that you were giving in
 21 real time as it went along, that's why we have an OFC;
 22 is that right?
 23 A. You are... With whatever word I said at the time,
 24 I honestly couldn't tell you, but it was basically
 25 protection element now which we were doing because

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1 we were -- as part of the working strategy you are
 2 minimising any further risk, ie a follow-up from another
 3 terrorist, which once we'd gone to the concourse and
 4 we'd seen the bomber and what was left of the bomber,
 5 then that sort of confirmed further information that
 6 we'd received that the active shooter is a possibility,
 7 a very realistic possibility, because we've now got the
 8 explosion, which is confirmed from the remains of the
 9 bomber --
 10 Q. Yes.
 11 A. -- which (inaudible: distorted) see the scene.
 12 Q. So at that point you know you're going to have to deploy
 13 armed officers to carry on a sweep of the wider arena
 14 area and that you may have to react to other reports of
 15 a threat in the vicinity, but you were also deploying
 16 officers at the scene of where you obviously realised
 17 that the bomb had gone off to develop the Plato plan,
 18 which also included the deployment of other emergency
 19 services. Is that a fair way of putting it?
 20 A. Yes.
 21 Q. I'll come back to the multi-agency response in a moment.
 22 Can I just briefly deal with the exercise that you told
 23 us about. I don't think we have a name for it,
 24 Mr Greaney suggested it might be [REDACTED] but whatever, no
 25 doubt we'll find out.

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1 That was an exercise that involved Greater
 2 Manchester Police firearms officers and I think it
 3 involved NNAS HART, the HART team; yes?
 4 A. I'm of the opinion the HART team were present, but
 5 definitely NNAS or paramedics were there, yes.
 6 Q. Okay. This was in 2017, before 22 May?
 7 A. Yes.
 8 SIR JOHN SAUNDERS: Mr Weatherby, we're going to avoid at
 9 the moment trying to identify the name of this
 10 particular exercise, if that's all right by you.
 11 If we do get information, we'll of course bring it back
 12 to you. Thank you.
 13 MR WEATHERBY: Yes, thank you very much.
 14 A. (Overspeaking) help in any way.
 15 SIR JOHN SAUNDERS: I'm not sure whether I should get you to
 16 help; that's my problem.
 17 A. It was a part of ARV training, which -- every section
 18 does ARV training and this wasn't because of a -- other
 19 forces being involved, it was basically the training
 20 complex that GMP have where we conducted an MTF--style
 21 attack and --
 22 SIR JOHN SAUNDERS: It was a fairly routine --
 23 MR GREANEY: I think Chief Inspector Buckle may have
 24 (inaudible: distorted) yesterday. That's very helpful
 25 thank you.

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1 A. Does that makes it clearer, sir?
 2 MR GREANEY: It does, thank you.
 3 MR WEATHERBY: I do want to ask one or two further questions
 4 about this and if I'm overstepping the mark then no
 5 doubt I'll be told but I don't anticipate I will.
 6 SIR JOHN SAUNDERS: The line you are going down is fine,
 7 I think.
 8 MR GREANEY: Mr Weatherby certainly isn't overstepping the
 9 line and he wasn't to have known what the line is.
 10 We're simply avoiding naming any particular operation
 11 but you can certainly, Mr Weatherby, ask about the
 12 substance of the exercise.
 13 MR WEATHERBY: Yes. May I just say that where I'm going
 14 with this, just so that you know, is that I just want to
 15 know which organisations were involved --
 16 MR GREANEY: There's no problem with that.
 17 MR WEATHERBY: -- and which commanders, if they were similar
 18 to ones involved in the night.
 19 MR GREANEY: Mr Weatherby, for my part I think that's
 20 entirely in order.
 21 MR WEATHERBY: Thank you very much. No doubt I'll be
 22 stopped if I go any further than that.
 23 Mr Richardson, do you know about how long before
 24 22 May? Do you think it might have been January or do
 25 you think it might have been March or can you simply not

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1 remember?
 2 A. I honestly can't remember. I would be of the opinion
 3 that it's within my notebook at some point, but again
 4 I couldn't tell you off my head.
 5 Q. No problem. So there was the firearms department of
 6 GMP. Were there any unarmed divisions involved in the
 7 exercise?
 8 A. As in divisional area staff or just unarmed trauma care
 9 staff?
 10 Q. Either.
 11 A. There was no divisional staff. There was basically
 12 medical care who were present.
 13 Q. From GMP or NNAS?
 14 A. I'm of the opinion it was NNAS. Again, it's something
 15 that I don't recall exactly who they were now, I most
 16 probably wouldn't have documented that either.
 17 Q. I won't press it any further than this. So far as we
 18 have established there were GMP firearms officers, such
 19 as yourself, and you think NNAS were involved. Just yes
 20 or no for the moment, is that it so far as any
 21 organisations involved in that exercise so far as you
 22 can remember?
 23 A. Yes.
 24 Q. Was there an FDO on the exercise?
 25 A. No.

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1 Q. I suppose probably my next question I know the answer
 2 to, but I'll ask it anyway. So no involvement from
 3 control rooms, either GMP or NNAS so far as you are
 4 aware?
 5 A. No.
 6 Q. Right. You were telling us about the fact that you were
 7 expecting on that exercise the deployment of NNAS
 8 personnel and that didn't happen. Have I understood
 9 that rightly?
 10 A. On the night of the 22nd?
 11 Q. No, no, sorry on the exercise that we are talking about.
 12 A. I obviously wasn't aware of the -- I knew there was an
 13 exercise, a Plato exercise planned, though to what
 14 extent it wasn't really clear to us until we turned up
 15 on that day of training.
 16 SIR JOHN SAUNDERS: I thought you explained to us you were
 17 expecting NNAS staff to follow in --
 18 A. Sorry, do you mean the activation of implementing the
 19 tactic?
 20 SIR JOHN SAUNDERS: I think so.
 21 A. Sorry, if this makes sense, it was conducted in waves of
 22 firearms response. So the initial first wave of the
 23 firearms response would be going in and clearing an
 24 area, predominantly rooms, if there was no identifying
 25 sort of noises or signs of where the threat was, and

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1 then we would hear shooting, which predominantly led to
 2 an area where we can shoot and then a second wave would
 3 follow behind and then it would be an expectation that
 4 if it was safe for the HART team or NWAS to come in,
 5 they would follow in with — the second wave or third
 6 wave of the firearms contingency.
 7 MR WEATHERBY: I don't want to trespass into operational
 8 matters here, but am I right that you were expressing
 9 earlier this morning that something had gone wrong with
 10 the deployment of NWAS on that exercise or something
 11 hadn't gone according to plan?
 12 A. Yes.
 13 Q. Was that, as far as you're aware, a disagreement between
 14 GMP and NWAS or was it a communications difficulty or
 15 something else?
 16 A. I think to the extent that I had involvement with it
 17 at the debrief at the very end it was the concerns from
 18 the firearms officers that basically the medical team
 19 were not going through the LoE on the say—so of them
 20 saying it was safe for them to go. The medical team
 21 insinuated that they would go forward on the say—so of
 22 their command structure, which is obviously going to
 23 delay the response.
 24 Q. You may not be able to answer this and if you can't just
 25 say, but do you know whether that debriefing exercise

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1 led to any resolution going forward? You may not know.
 2 A. I couldn't say if I'm honest.
 3 Q. Okay.
 4 SIR JOHN SAUNDERS: My recollection of the LoE is that it is
 5 agreed between everybody so it maybe that's had to
 6 remain the position.
 7 MR WEATHERBY: Okay. On that exercise were you the OFC?
 8 A. I wasn't, no.
 9 Q. Okay. Do you know, was there a TFC?
 10 A. Not to my recollection.
 11 Q. Okay. I'll leave it there and move on.
 12 In terms of — I just want to explore some of the
 13 things that you said about a multi-agency response.
 14 Of course, you have told us that in your role you well
 15 understand the importance of getting your emergency
 16 service partners to casualties as soon as possible and
 17 no doubt that was fresh in your mind from the exercise
 18 we've just been discussing as well; yes?
 19 A. Yes.
 20 Q. Once you were in the City Room on 22 May, the need for
 21 an emergency service response was very urgent indeed,
 22 wasn't it?
 23 A. Yes.
 24 Q. AFOs are specially trauma trained, no doubt for a pretty
 25 obvious reason, that they are likely to come across very

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1 serious trauma injuries; is that right?
 2 A. Yes.
 3 Q. But on the night, your role was to deal with the
 4 potential terrorist threat, to safeguard other
 5 responders and members of the public, and you simply
 6 didn't have any capacity to use your trauma training;
 7 is that right?
 8 A. All the trauma equipment that we have were in the cars,
 9 are in the cars.
 10 Q. But your role that night was in fact to neutralise the
 11 threat and then to protect the responders; is that
 12 right?
 13 A. Yes.
 14 Q. That's why, from an early stage in your presence at the
 15 City Room, you were calling up the FDO and asking for
 16 ambulances and paramedics; is that right?
 17 A. Yes.
 18 Q. I'm not going to take you through the references,
 19 Mr Greaney's taken you through them, but more than once
 20 you were calling for ambulances and I think Mr Sexton
 21 was saying that he was trying to arrange them; yes?
 22 A. Yes.
 23 Q. You told us this morning that you conducted effectively
 24 a dynamic risk assessment and you thought it was
 25 sufficiently safe. Let's put zoning on the shelf for

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1 a minute, but you thought it was sufficiently safe not
 2 only for you to be in the City Room but also for
 3 paramedics and other responders, perhaps Fire and Rescue
 4 Service responders, to be in there as well?
 5 A. It's not as cut and dried as that. We are meant to be
 6 in the — firearms officers are basically meant to be
 7 in that location to protect anyone else and each other.
 8 So if unarmed staff, whatever resource they come from —
 9 they still need protecting. So we were the reason who
 10 could intervene with anything. To say that it was safe,
 11 I would mostly be saying maybe a 75% probability that it
 12 was safe.
 13 Q. Yes.
 14 A. There's always that percentage where we've still got to
 15 react to something or protect the unarmed resources.
 16 Q. Okay. So in considering the position, your sort of
 17 dynamic risk assessment, you'd established more or less
 18 that there was no active shooter, it was highly unlikely
 19 that there was any active shooter in the City Room, and
 20 you deployed armed officers to ensure it stayed that
 21 way?
 22 A. Yes.
 23 Q. And you were concerned about the possibility of
 24 a secondary device, as of course was very sensible, but
 25 you had no actual evidence that there was such a threat?

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1 A. We had no evidence that a bomber walked into the arena,
 2 but one did, and the police weren't aware of that.
 3 Q. Yes, okay. But at the point you were considering your
 4 risk assessment, you told us that you thought it was 75%
 5 safe. That's effectively what you're saying: no active
 6 shooter, but there is a possibility of a secondary
 7 device. But you, the emergency services, are faced with
 8 this terrible scene with multiple casualties and so your
 9 assessment was that you could protect responders coming
 10 in and it was urgent that they do so?
 11 A. Yes.
 12 Q. I'm not criticising you at all, I'm just trying to work
 13 through exactly what your thought process was. That's
 14 why you were then calling for ambulances to the FDO?
 15 A. Yes.
 16 Q. And those were getting through because we've seen them
 17 on the transcripts and Mr Sexton was replying to you?
 18 A. Yes.
 19 Q. Now, in his replying to you, did he at any point ask you
 20 whether it was safe for emergency responders or any
 21 particular form of responders or did he ask you about
 22 zoning?
 23 A. I don't recall him asking me about zoning. But my
 24 opinion towards that would be because I was of the
 25 opinion I transmitted my message --

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1 Q. Yes. Exactly where I was headed next, that your view,
 2 rightly or wrongly, and I'm not going to ask you any
 3 more questions about it because you've been asked many
 4 already, your view is that you had told -- you had
 5 communicated that the City Room should be treated as
 6 warm?
 7 A. Yes.
 8 Q. Whether or not you're right about that or whether or not
 9 the communication got through, the FDO, Mr Sexton, could
 10 have simply asked you when you were asking for
 11 ambulances what your dynamic risk assessment was and he
 12 could have asked you about zoning, couldn't he?
 13 A. He could have, yes.
 14 Q. And so far as your recollection is, and of course we've
 15 got the transcripts, he didn't do so?
 16 A. No, he didn't, but I do think there's a reason behind
 17 that because of the --
 18 Q. (Overspeaking) and that's how you communicated it?
 19 A. Also, how much he was overwhelmed, not only just the
 20 fact of the communication, I was of the opinion -- but
 21 it was just too much for one person to complete what his
 22 expectations were or what was expected of him should,
 23 I say.
 24 Q. Yes, that's a very fair point.
 25 This morning you presented the document that you

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1 said that you carried with you in the ARV. There's just
 2 one point, I don't think we need to look at it, but on
 3 page 4 you refer to "contingencies". Under
 4 "contingencies" you refer to the treatment of
 5 casualties; yes?
 6 A. Yes.
 7 Q. So that's kind of a prompt on this form that you had
 8 with you and we've already discussed that you as AFOs
 9 might on occasion be able to give trauma care, but here
 10 it was beyond your capacity and, of course, there were
 11 far too many casualties for you to do so anyway; yes?
 12 A. Yes.
 13 Q. So the contingency that you were applying there was this
 14 communication that you needed other emergency services
 15 resources straightaway?
 16 A. Yes.
 17 Q. And as part of that, you were deploying AFOs to make
 18 sure that the area, so far as you could do so, you were
 19 deploying your AFOs to make sure that the City Room was
 20 safe from further threat?
 21 A. I think initially it was with the resources that we had
 22 to hand, I had availability to, was the City Rooms were
 23 secured, but then this led over time towards the bridge,
 24 across the bridge towards Victoria Station, and then
 25 down -- the name of the road escapes me. Basically also

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1 giving protection then as more ARVs attended sort of
 2 where people were being treated outside where the
 3 ambulances have turned up and parked up.
 4 Q. In terms of this reference to part of your consideration
 5 on a deployment being the treatment of casualties, in
 6 effect because of the capacity issue and the other roles
 7 that you were conducting on that night, and the extent
 8 of the casualties, you were passing over that
 9 contingency to the FDO and it was his role to arrange
 10 the emergency services' attendance at the scene; is that
 11 a fair way of putting it?
 12 A. Unfortunately, with only having one radio to do that, to
 13 transmit that, to get that message across, unfortunately
 14 it falls on the FDO to receive that sort of message for
 15 them then to send whoever they have to sort of get in
 16 touch with the relevant services to respond or to turn
 17 up at scene.
 18 Q. Yes.
 19 A. And that's what it was on the night.
 20 Q. Thank you very much.
 21 One last point. Inspector Smith, did you come
 22 across the unarmed commander in the City Room, Mr Smith?
 23 A. I didn't, no.
 24 MR WEATHERBY: Okay. Those are my questions. Thank you
 25 very much, Mr Richardson.

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1 MR GREANEY: Sir, as Mr Weatherby has just mentioned, during
 2 the course of Constable Richardson's evidence, he's
 3 helpfully produced the document that he had with him to
 4 record the tactical plan. A Rule 10 request has been
 5 submitted by Mr Cooper's team to ask about this new
 6 document. It seems to us that that's entirely
 7 understandable and that some time ought to be granted to
 8 enable that to occur. I understand Mr Cooper feels he
 9 can deal with it in 10 minutes.
 10 MR COOPER: Mr Weatherby has covered a number of the matters
 11 I was going to cover --
 12 SIR JOHN SAUNDERS: I just want to be absolutely clear about
 13 this: you did not want rescuers, people who were
 14 treating the injured, to have to get out of the
 15 City Room?
 16 A. Sorry, sir?
 17 SIR JOHN SAUNDERS: You've got people treating injured
 18 people.
 19 A. Yes.
 20 SIR JOHN SAUNDERS: Seriously injured people in the
 21 City Room and you didn't want anything you did, like
 22 declaring a red zone or anything like that, to mean they
 23 had to leave? You wanted that treatment to carry on?
 24 A. Yes, it doesn't really achieve anything to send people
 25 away.

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1 SIR JOHN SAUNDERS: I understand. Did that extend to you
 2 taking any action to try and get more people in to give
 3 treatment such as getting more paramedics in?
 4 A. I think over time, more people were coming in.
 5 A timescale -- I honestly couldn't say what it was.
 6 SIR JOHN SAUNDERS: Were you doing anything to prevent
 7 people coming in?
 8 A. No. The more people came in, the more we were
 9 considering widening the firearms protection element --
 10 SIR JOHN SAUNDERS: Right.
 11 A. -- which eventually progressed to outside.
 12 SIR JOHN SAUNDERS: Thank you.
 13 Questions from MR COOPER
 14 MR COOPER: Officer, as you probably realise, I too
 15 represent some of the families in this matter. I only
 16 have a few questions to ask of you and it's connected
 17 with the document you helpfully supplied to us with this
 18 morning if you have it in front of you.
 19 It is simply one line from this document, the
 20 operational firearm commander's brief. Under
 21 "Contingencies", it's been touched upon, under the
 22 heading "Injury".
 23 "D3 trained", that means advanced first aid trained;
 24 is that right?
 25 A. D13.

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1 Q. D13, yes. Advanced first aid trained?
 2 A. Yes.
 3 Q. What sort of skills would such an individual have?
 4 A. With the right equipment, which we keep in our cars,
 5 it's clearing airways, basically applying tourniquets.
 6 Q. On the subject of tourniquets, would there be
 7 tourniquets in the equipment that you'd brought with you
 8 to the scene?
 9 A. In the cars.
 10 Q. I'm coming to that in a moment. How many tourniquets
 11 would be included?
 12 A. At this time maybe one, two. I think they've changed
 13 since then so I'm not 100% sure.
 14 Q. One or two per officer?
 15 A. Per car. They had one pack of D13 trauma care
 16 equipment --
 17 Q. I understand.
 18 A. -- in a very large bag in the car.
 19 Q. And if in any way this is operationally sensitive,
 20 please pause for a moment. The simple question is how
 21 many cars were there? If that's going to compromise
 22 anything in the future, that's the last thing the
 23 families want. But I'm just trying to work out how many
 24 bags there were. If there's no objection to you
 25 answering that question, and if you're comfortable, can

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1 I ask you how many cars were at the scene?
 2 A. From the aspect where I was, there was myself, the car I
 3 was in and one other.
 4 Q. Thank you.
 5 This is no criticism, things were fast-moving and
 6 the families, I should emphasise, are of course most
 7 grateful to you and colleagues for what you did --
 8 MR GREANEY: I wouldn't want Mr Cooper to be misled by the
 9 last answer. The witness and Mr Cooper may have been at
 10 cross-purposes. Ultimately, without giving a particular
 11 number, there were many more than three ARVs at the
 12 scene. Indeed, to use the witness's own phrase, I hope
 13 he'll excuse me, ultimately he was to say there were
 14 "shitloads" at the scene.
 15 MR COOPER: I'm grateful. I'm not going to pry as to how
 16 many.
 17 SIR JOHN SAUNDERS: He probably doesn't know anyway.
 18 MR COOPER: Would there have been any way that if people had
 19 wanted to get access to those vehicles, other services
 20 for instance, ambulance or even fire, they could have
 21 got access to those vehicles to get that equipment and
 22 to use it?
 23 A. No, because once we leave the cars, they should be
 24 locked [REDACTED]
 25 [REDACTED]

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1 Q. Is there any way in the future perhaps, God forbid it
 2 should ever be needed again, for that first aid
 3 equipment perhaps either to be put in a place where
 4 people could access it without getting to the car so
 5 that this important equipment maybe could be used and
 6 utilised ?
 7 A. I don't think that's really something I could answer.
 8 I'm not sure whether I can answer that because obviously
 9 things for the future has not been decided, doesn't get
 10 decided by myself. I think from the night in question,
 11 I think it's progressed where some firearms officers are
 12 issued some kit that they can carry on their person now,
 13 so they've got them on their person if they need to
 14 leave the car, which will be life -saving in itself
 15 because it's a tourniquet and we've got that ourselves
 16 and we carry that on our person now if we go to such an
 17 event like that, hopefully it won't happen again, but
 18 we've learned from it as we do.
 19 Q. Of course. You anticipated my point precisely and
 20 you're aware obviously that one of the issues was the
 21 availability of tourniquets and in the future you're
 22 reassuring us, are you, that officers such as you and
 23 your colleagues, who are there to perform very important
 24 duties, will also be carrying this material around with
 25 them that they can distribute, at least, with ease?

1 A. I know plenty of officers who do carry that type of
 2 equipment with them now and also further airway clearing
 3 equipment, OPAs, NPAs, the likes of -- and obviously our
 4 training has now progressed further with regards to
 5 trauma care as well. It's not to say that on the night
 6 in question that there was directions given to arena
 7 staff who were struggling to deal with people who were
 8 bleeding out. Myself included gave someone to the point
 9 of applying direct pressure to a wound because someone
 10 was bleeding out to the point where I said, "If it
 11 doesn't stop bleeding, stand on it". It sounds quite
 12 crude in form, but extreme circumstances demand
 13 extreme measures, and potentially if someone stops
 14 someone (inaudible: distorted) that could potentially
 15 save their life .
 16 Q. Quite understood. For instance, in terms of the
 17 training that you and your officers now have, for
 18 instance, in applying a tourniquet and other life -saving
 19 techniques, do you have particular training to do this?
 20 First question, did you have it on the 22nd? Second
 21 question, do you have it now?
 22 A. Which one do you want me to answer first, the first one?
 23 Q. (Overspeaking) --
 24 SIR JOHN SAUNDERS: I think the first one and then you might
 25 not need to answer the second one.

1 A. It was very early stages of being taught advanced trauma
 2 care and it's progressing as time goes by and we're
 3 doing more and it's yearly refreshers and sometimes a
 4 three-day or a one-day refresher, but we do do it. But
 5 predominantly, and this most probably sounds -- doesn't
 6 sound the best, but your overall role in that
 7 environment is still the firearms threat but that's not
 8 to say that, as I did on the night, I spoke to many
 9 arena staff and gave them directions of what to do
 10 because they clearly didn't have a clue what to do.
 11 Q. So for instance, now, as I say, God forbid this should
 12 ever happen again or anything like it, you, for
 13 instance, would be able to apply, if you had time,
 14 a tourniquet, for instance?
 15 A. Yes.
 16 Q. Just looking again at that one line that appears under
 17 "Contingencies":
 18 "Initially self-help and if safe."
 19 Could you just explain what that means?
 20 "All D13 trained initially self-help and, if safe,
 21 call amber."
 22 What does the initially self-help --
 23 A. This predominantly refers to the likes of myself,
 24 a firearms officer. If any of us are compromised on
 25 approach to implementing a tactic and one of us is shot,

1 the tactic will then progress to eliminate any further
 2 threat. If that person is conscious when they are
 3 injured to wherever it may be, a gunshot wound, then if
 4 they can do things themselves, then do so. But we will
 5 deal with you eventually when we can when it's safe to
 6 do so.
 7 Q. Thank you. Then you have:
 8 "Call ambo from RVP to scene."
 9 Is that the responsibility of the OFC to call the
 10 ambulance, the specific responsibility ?
 11 A. I would speak -- once the scene is safe for ambulances
 12 to come, or any trauma care trained resources are safe
 13 to attend the scene, I will inform the FDO, or as I do
 14 now to my original force, I will speak to the radio
 15 staff on the second radio that I carry on my person.
 16 Q. So finally this: would it be right to say that,
 17 certainly going forward for the future, if a catastrophe
 18 happened like this again in the future, you and your
 19 officers would be even more equipped and better trained
 20 to provide first aid and emergency treatment to
 21 casualties ?
 22 A. Once practicable to do so, once our primary role has
 23 been conducted then, yes.
 24 MR COOPER: Of course, thank you.
 25 SIR JOHN SAUNDERS: Was there any opportunity for either you

1 or for you to ask any of the other officers who were
 2 there, we gather at the end there were quite a number,
 3 to get their bags of equipment (overspeaking) --
 4 A. At that time, sir, when we left the cars, all our extra
 5 equipment is within the cars and some distance away.
 6 For me, if the car was around the corner and in a line
 7 of sight I wouldn't have been under any illusion or
 8 I wouldn't have hesitated to have sent an officer
 9 forward to get something from the car.
 10 SIR JOHN SAUNDERS: It just wasn't practical as far as you
 11 were concerned?
 12 A. At that time you don't send one firearms officer off to
 13 a location out of line of sight from everyone else. We
 14 are meant to be in line of sight with each other, we are
 15 meant to be in pairs. You just don't send one off and
 16 you could massively deplete your team, unfortunately, if
 17 you do start sending firearms officers off.
 18 MR COOPER: How big is this bag? I only ask the question as
 19 to why it was left in the car and why it wasn't carried
 20 around with you and your colleagues right from the word
 21 go.
 22 A. We carry that much kit from MOE equipment -- because
 23 there were still doors inside the arena which were
 24 locked and you can overwhelm yourself with kit and
 25 equipment that you become ineffective, and it weighs in

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1 excess of 30 pounds with the equipment that's in it.
 2 MR COOPER: Thank you, officer.
 3 MR GREANEY: Sir, Mr Horwell on behalf of Greater Manchester
 4 Police next, please.
 5 SIR JOHN SAUNDERS: Thank you, Mr Horwell.
 6 MR HORWELL: Sir, simply for the avoidance of doubt,
 7 we weren't aware of the briefing note. This was the
 8 first time I saw it this morning.
 9 As for Mr Richardson's training, we think we've
 10 narrowed it down to a few possibilities and I hope
 11 we will have news for you tomorrow.
 12 SIR JOHN SAUNDERS: This clearly is not the briefing note
 13 at the time, this is a more recent briefing note?
 14 MR HORWELL: Yes.
 15 SIR JOHN SAUNDERS: Thank you.
 16 A. This is something we don't get issued with. This is
 17 something that through the training that we receive, the
 18 command training we received, we basically print this
 19 out ourselves and we do a format and what the sort of
 20 headings are that we have to identify and hit, which is
 21 pretty much the same as the ITFC briefing sheet, which
 22 I believe is -- there is one filled out, I'm led to
 23 believe, which I have seen, which has been filled out
 24 after the night in question.
 25 SIR JOHN SAUNDERS: One of those?

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1 A. One of these, which is the ITFC briefing, which I was
 2 sort of sent via email. It was a question of my own, to
 3 be fair, which is it's been filled out and the question
 4 on my behalf was -- obviously, this was not -- the
 5 question for me was this was not something which was
 6 filled out or given on the night in question, it was
 7 done afterwards, but there's a clear explanation of how
 8 the briefing sheet goes with regards to the information
 9 that's required in the context.
 10 SIR JOHN SAUNDERS: When you say you asked for it by email,
 11 that's after these events?
 12 A. I've had it sent to me --
 13 SIR JOHN SAUNDERS: Okay.
 14 A. -- by email.
 15 Questions from MR HORWELL
 16 MR HORWELL: Mr Richardson, just a few questions, please.
 17 You have told the chairman in evidence, and it's in your
 18 witness statements, that when you entered the City Room,
 19 your concern was twofold: the threat of another
 20 terrorist or terrorist with firearms, and the threat of
 21 a secondary device.
 22 A. Yes.
 23 Q. When you entered the City Room, did there become a stage
 24 when you were satisfied that there was not a terrorist
 25 in the City Room itself?

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1 A. I don't think throughout the evening I was 100%
 2 satisfied because of the size of the complex.
 3 Q. I was going to ask you. So you never became satisfied?
 4 A. Not 100%, no.
 5 Q. That's within the City Room. Were you concerned about
 6 the possibility of a terrorist or terrorists outside of
 7 the City Room?
 8 A. Yes.
 9 Q. We've seen from your communication schedule the
 10 information that became available as the evening
 11 progressed.
 12 A. Yes.
 13 Q. Did you remain concerned about another terrorist or
 14 terrorists with firearms?
 15 A. Yes.
 16 Q. From outside the City Room?
 17 A. Yes.
 18 Q. And did that concern ever go away?
 19 A. No, and it was something that I pressed on to the other
 20 firearms officers present, basically to keep your wits
 21 about you, in layman's terms.
 22 Q. And as there were reports of a second male and the like,
 23 what effect did that have on the concern that you had of
 24 the threat of a terrorist from outside of the City Room?
 25 A. I was aware that other firearms officers were sort of

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1 responding to that second male and there was also
 2 another OFC who took up that role. So I was concerned
 3 with regards to that, there's someone moving around the
 4 city who potentially could have been involved. That's
 5 not just to say it's one more person. So it was very
 6 much a case of a state of alertness, even though we were
 7 static points within the arena.
 8 Q. Secondary devices. You have explained or you did
 9 explain in one of those communications that we looked at
 10 that you were concerned about bins and packages that had
 11 been left when people must have run out of the
 12 City Room.
 13 A. Yes.
 14 Q. Did you remain concerned about the threat from
 15 a secondary device from within the City Room?
 16 A. Throughout the evening until we could get an explo dog.
 17 Q. And we know that that didn't happen until much later.
 18 But how, if at all, do you assess the threat of
 19 a secondary device?
 20 A. Again --
 21 Q. You can't test the packages?
 22 A. No, you can't, and there's no X-ray vision of firearms
 23 officers or police officers, so you are predominantly
 24 keeping unarmed assets away from that location and if
 25 something was there and if something did go off, then

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1 the first people it was going to hit would be us.
 2 Q. And how do you assess that risk? Because you don't know
 3 what's in the packages, they are there, it's a risk that
 4 you have to take?
 5 A. The police officers run towards danger predominantly,
 6 don't they? Where the natural response from people
 7 would be to run away, everyone that night ran towards,
 8 and you deal with it. The top of the working strategy
 9 at that time is the public, so you are putting yourself
 10 in harm's way. Everyone was that night. Every uniform.
 11 Q. And no doubt those not in uniform within the City Room?
 12 A. Yes.
 13 Q. Another topic, please. You have been shown one of many
 14 documents that indicated that the OFC is to remain
 15 at the RVP/FCP until relieved by the ground-assigned
 16 TFC.
 17 A. That's not accurate.
 18 Q. That is what the document states, and the chairman said
 19 that obviously that fulfils a function because that
 20 would enable the OFC, if it were to happen, to liaise
 21 with other emergency services. Now, that is an
 22 advantage, obviously?
 23 A. Again, I go off my -- we activate tactics operationally,
 24 live, as a result of what we do in training. I've never
 25 received any training that's encouraged any OFC or

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1 myself to go to an RVP or to go to an FCP ever, so it's
 2 naturally not something we would do because it's not --
 3 it's not what is practised at all.
 4 Q. I'm going to keep with the guidance for a moment. There
 5 is obviously an advantage, Mr Richardson -- if you don't
 6 agree with me then don't agree with me, but there is an
 7 advantage in that it's a means of liaising with the
 8 other emergency services. If you don't agree, say so.
 9 A. I don't agree.
 10 SIR JOHN SAUNDERS: I think you actually said to me that
 11 once you were sure that any threat of a terrorist gunman
 12 was cleared, that going to the FCP would be an advantage
 13 to you because you could then say to the ambulance
 14 commander and the fire commander, "Right, it's all
 15 clear, you're free to go in".
 16 A. If you also look at the roles and responsibilities, sir,
 17 with due respect, it also says that I should be readily
 18 available for all firearms officers under my command.
 19 I can't do that if I'm traipsing, however many hundreds
 20 of metres away, because you are close to the FCP or the
 21 RVP -- far enough away from any danger. It goes against
 22 what also the roles and responsibilities are of the OFC.
 23 MR HORWELL: I wanted now to leave the guidance and look
 24 at the practicalities and the realities, Mr Richardson.
 25 Did you believe that -- and you have told the chairman

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1 that if you had to leave you had to leave with another
 2 firearms officer, firearms officers work in pairs.
 3 A. Yes.
 4 Q. Did you believe that two firearms officers, including
 5 yourself, could depart from the City Room --
 6 A. No.
 7 Q. -- at an early stage?
 8 A. It didn't even enter my head, no.
 9 Q. And did you ever believe that the City Room was
 10 completely safe?
 11 A. No.
 12 Q. As for another piece of guidance, you've been asked
 13 about tactical plans and working strategies. Obviously,
 14 if there is time they have their place and their part to
 15 play.
 16 A. Yes.
 17 Q. But on this particular night, and the circumstances in
 18 which you found yourself, it is often said that the
 19 quantity and quality of information is at its lowest
 20 when the demand is at its highest.
 21 A. Yes, I agree with that.
 22 Q. There was very little for either you or the FDO to work
 23 on when you arrived?
 24 A. Yes.
 25 Q. And in terms of the working strategies or the tactical

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1 plan that has been suggested, such as treat the scene as
 2 a probable gun or bomb attack, locate and neutralise the
 3 threat, sweep the area for active shooters, search for
 4 secondary devices, overall the threat assessment is
 5 high, minimise the risk to the public, maximise the
 6 safety of firearms officers and others.
 7 A. Predominantly it would be unarmed staff and then
 8 we would come further down the line as there is an order
 9 for it.
 10 Q. That's a potential list of what might have been
 11 a working strategy or tactical plan?
 12 A. Yes.
 13 Q. Was all of that obvious to you, Mr Richardson?
 14 A. It has been said to me that many times, predominantly on
 15 deployments, and I'm sure I'm not speaking for every
 16 firearms officer but myself, I can most probably fill
 17 out the first two lines, three lines of a working
 18 strategy and a threat assessment because predominantly
 19 it can be very much the same because the priority for
 20 the police is to protect the public and save lives.
 21 Q. That list I have just gone through, was all of that
 22 obvious to you on the night?
 23 A. Some of it was.
 24 Q. What wasn't?
 25 A. The control measures, tactical parameters predominantly

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1 with regard to what's expected from the firearms
 2 officers upon entering the arena.
 3 Q. Well, you will only know that when you enter.
 4 A. And that's also a — tactical parameters can also be
 5 induced by the command structure from Silver.
 6 Q. But you only knew what you'd find when the entered the
 7 door of the City Room, didn't you?
 8 A. Yes.
 9 Q. And nothing could inform you as to what you would see?
 10 A. No, you are going in to confirm or negate.
 11 MR HORWELL: Yes. Thank you, Mr Richardson.
 12 SIR JOHN SAUNDERS: Just before we finish, I have to come
 13 out with recommendations at the end of all this. Is
 14 your recommendation then on the basis of what you've
 15 just been asked: well, actually, normally we can do
 16 without a tactical plan? The whole basis of how these
 17 things operate is strategy, strategic plan, tactical
 18 plan, putting into practice. Are you doubting that?
 19 A. Predominantly, sir, if obviously Mr Sexton gave us
 20 a brief, we would tell him the proximity or the close
 21 proximity we were of the arena. If he gave us a full
 22 brief and then I hold everyone before they enter the
 23 building and I gave them a full brief, that inevitably
 24 is going to delay a firearms response.
 25 SIR JOHN SAUNDERS: I'm not suggesting that. What I am

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1 suggesting is — are you saying to just forget about the
 2 briefing it's all perfectly obvious?
 3 A. No, not at all.
 4 SIR JOHN SAUNDERS: You just want to do it quickly?
 5 MR HORWELL: You want as much information as possible?
 6 A. Yes.
 7 MR HORWELL: But, sir, I'm not trying to diminish the
 8 importance of strategies and working plans. But when
 9 there's been a terrorist attack, it might be thought
 10 that the firearms officers should get to the scene as
 11 quickly as they can.
 12 SIR JOHN SAUNDERS: I quite agree and I'm not in any way
 13 diminishing that; I'm just wishing to see how far this
 14 goes.
 15 MR HORWELL: It's a balance.
 16 SIR JOHN SAUNDERS: Absolutely.
 17 MR HORWELL: Thank you.
 18 Further questions from Mr Greaney
 19 MR GREANEY: I just have a very small number of questions
 20 and then you'll be finished.
 21 At any stage that night, or at any rate at any stage
 22 that was relevant to the work you were doing, did you
 23 know what the strategic plan was?
 24 A. I can't recall it, no.
 25 Q. At any stage that night, any relevant stage that night,

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1 did you know what the tactical plan was?
 2 A. Initially, the plan for the firearms officers, yes,
 3 I would have. From the information I was given it would
 4 have been to enter, conduct an emergency search,
 5 identify, locate and neutralise any threat.
 6 Q. That was the tactical plan so far as you understood it?
 7 A. Yes.
 8 Q. That was the first thing I wanted to ask you about. The
 9 second, and there are only two, was this —
 10 SIR JOHN SAUNDERS: When Mr Dexter comes on the scene,
 11 do you discuss a tactical plan then with him? You've
 12 got somewhere down the line now, so you're telling him
 13 what's happened, no doubt.
 14 A. Initially the response, sir, when we attend the scene
 15 and obviously it's a scene of calm from the aspect, I'm
 16 updating him with what I am looking at and that's
 17 predominantly in sort of like the armed enquiry phase,
 18 we're the best officers in that location who can respond
 19 if circumstances dictate. If I would have seen people
 20 running out, screaming, I wouldn't have to wait for
 21 Inspector Dexter to authorise an emergency search,
 22 I would authorise that. The role of the OFC would give
 23 me that authority.
 24 MR GREANEY: Inspector Sexton.
 25 A. Sorry, inspector Sexton. I wouldn't have to wait for

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1 him to tell me to authorise an emergency search, I could
 2 do that myself and I will update him at a more
 3 practicable time.
 4 MR GREANEY: Sir, I'm going to move on then to the second of
 5 my two points. It's really just something that I want
 6 to be clear about, it may be that others are already.
 7 It relates to — I'm going to call it your pro forma, so
 8 the document that you have given to us today that you
 9 will use in the event of an incident in order to record
 10 the tactical plan.
 11 The document that you have provided to us today,
 12 have I correctly understood that is the document you use
 13 in Merseyside?
 14 A. Yes.
 15 Q. Have I also correctly understood that this is a document
 16 that you have devised yourself in accordance with your
 17 training?
 18 A. And instructional — instructions from the firearms
 19 instructing staff to train us within the operational
 20 command structure.
 21 Q. By instructions, do you mean you have received an
 22 instruction that you should prepare this document?
 23 A. Yes. We have a document, pretty much each — if I can
 24 explain. Each firearms officer will do things different
 25 ways but they will achieve the same aim.

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1 Q. This was one point I was going to come to in just one
 2 moment. So you've described a situation in Merseyside.
 3 In 2017, when you were in Greater Manchester Police, did
 4 the same system apply so that you had a pro forma, it
 5 was a pro forma that you had devised on the basis of
 6 information, training and instruction?
 7 A. Yes.
 8 Q. From what you've said, should we understand that
 9 different AFOs might have different pro formas but they
 10 all ought to achieve the same outcome?
 11 A. With regards to retaining information and giving their
 12 brief, it might be different, but the overall aim will
 13 be the same for the tactics that you are trained in.
 14 Q. Would it have been rather better, and indeed wouldn't it
 15 be rather better, if there were to be a standard
 16 pro forma that all AFOs used as opposed to devising
 17 their own?
 18 A. I think that's something — being part of the north-west
 19 region, a number of forces working together in the
 20 north-west region, that's something that they sort of
 21 may come to the opinion of. But at the time of the
 22 training that we get, we don't get given standard
 23 documents which we all — we will be given the ITFC's
 24 briefing and we will take very much the same briefing
 25 format for what we want to give, which has changed again

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1 recently, if that answers your question.
 2 Q. I think it probably does, yes, so thank you.
 3 At [draft] pages 166 and 167 {Day101/170:16} of the
 4 transcript for today, so very recently indeed, you told
 5 us that you sought out and been provided by email with a
 6 pro forma that had been completed after the events
 7 at the arena; did I understand you correctly?
 8 A. Yes.
 9 Q. And do you mean that that was emailed to you in the
 10 immediate aftermath of the attack or more recently?
 11 A. Recently.
 12 Q. I'm not aware of having seen that. It may well be that
 13 we do have it and I can't bring it to mind. Do you know
 14 who was the author of that pro forma completed after the
 15 event?
 16 A. I don't, no. I had it sent to me by my legal team.
 17 Q. So if we want a copy to make sure we have one, we should
 18 investigate that with your legal team?
 19 A. Yes.
 20 SIR JOHN SAUNDERS: Just one last point which I meant to ask
 21 earlier on. I'm sure, in the words of Mr Greaney, there
 22 will be a very good reason for this, but do you happen
 23 to know why you were told not to make detailed notes in
 24 your notebook after the event?
 25 A. I'm not entirely sure. It was predominantly like

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1 a first account of the incident. We were told that the
 2 following day at what point we fill out our notebooks,
 3 but other than that I can't recall anything being said
 4 to us.
 5 SIR JOHN SAUNDERS: Right. Thank you.
 6 MR GREANEY: Sir, thank you very much. That concludes the
 7 evidence of Mr Richardson.
 8 SIR JOHN SAUNDERS: Mr Richardson, I'm very grateful to you
 9 for your evidence. Armed officers going into this sort
 10 of situation, not knowing what they're going to find,
 11 are required to act with great courage, and you and the
 12 other armed officers who went in that night displayed
 13 that necessary courage. You also clearly did what you
 14 thought was right to protect life and what you could and
 15 clearly, from some of the things you've said lately, you
 16 were clearly helping with the injured as well while you
 17 were there. So thank you for that.
 18 A. Thank you, sir.
 19 MR GREANEY: Sir, would you not rise for one moment and
 20 could I ask Mr Richardson to bear with us? Because of
 21 the arrangements that have been in place for
 22 Mr Richardson's evidence, we do need to take a break at
 23 this stage. It will be a break of about 20 minutes at
 24 least. That would mean that we would be returning at
 25 gone 4 o'clock in order to start the evidence of

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1 Mr Lawton. Having had a 9.30 start, and speaking not
 2 only for myself, but also for other members of the
 3 inquiry legal team, we would doubt the wisdom of
 4 starting Mr Lawton at gone 4 o'clock, given we could not
 5 sensibly finish him. That's our view, but, of course,
 6 we are in your hands, sir.

7 SIR JOHN SAUNDERS: Anyone like to oppose Mr Greaney's
 8 powerful submission? Right.

9 MR GREANEY: So could we resume, subject to any different
 10 view you have --

11 SIR JOHN SAUNDERS: No, we'll continue at 9.30 tomorrow.
 12 I remind everybody we'll be finishing at about this
 13 time tomorrow as well. Obviously, I have no desire to
 14 work ridiculous hours, but equally we do need to get
 15 through the evidence and we are beginning to get behind
 16 again.

17 MR GREANEY: We are getting a little behind, sir, but we'll
 18 try to catch up.

19 SIR JOHN SAUNDERS: Okay. Thank you very much. 9.30
 20 tomorrow.
 21 (3.44 pm)
 22 (The inquiry adjourned until 9.30 am
 23 on Wednesday, 12 May 2021)
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