

OPUS2

Manchester Arena Inquiry

Day 107

May 20, 2021

Opus 2 - Official Court Reporters

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1 Thursday, 20 May 2021
 2 (10.26 am)
 3 MR GREANEY: Sir, good morning.
 4 SIR JOHN SAUNDERS: Good morning, Mr Greaney.
 5 As people are aware, Saturday is a very important
 6 day for the inquiry. It is the fourth anniversary of
 7 the arena attack. There are events taking place around
 8 the country, and particularly in Manchester, to
 9 commemorate the lives of those who died. All of our
 10 thoughts on Saturday will be with the families and
 11 friends of those who died, the survivors who were
 12 injured, many severely, and those who were caught up in
 13 these terrible events.
 14 At 10.31, a montage will be shown. I suggest that
 15 up until that time, we all remain seated and silent.
 16 When it has finished, I will rise for a short time
 17 before we continue with the evidence.
 18 MR GREANEY: Thank you, sir. We will now remain in silence
 19 until 10.31, at which point, as you've indicated, the
 20 montage will be played.
 21 (10.27 am)
 22 (Memorial montage shown)
 23 (10.50 am)
 24 SUPERINTENDENT MARK DEXTER (continued)
 25 Questions from MR GREANEY (continued)

1

1 MR GREANEY: Superintendent, at the end of yesterday you
 2 were helping us with the undesirability of the delay in
 3 the declaration of a major incident. I'm not going to
 4 go back over that, but what I instead want to do is to
 5 move to and to deal with your actions and
 6 decision—making from when we see you walk out of the
 7 City Room at 23.30 hours.
 8 Let's pick up the chronology, please. Can we have
 9 on the screen, Mr Lopez, {INQ035612/336}. This is the
 10 emergency response sequence of events.
 11 So as I indicated, it's 23.30 hours, you have just
 12 left the City Room, and you are in the company of the
 13 OFC, PC Richardson.
 14 The next page, please, {INQ035612/337}. You're now
 15 on the staircase leading from the overbridge down into
 16 the railway station itself. It's now 23.31.21. Can you
 17 see, superintendent, that you appear to be on the
 18 telephone?
 19 A. Yes, that's correct.
 20 Q. It seems likely that you are engaged at that stage in
 21 a telephone call with Chief Inspector Rachel Buckle that
 22 lasts 1 minute and 23 seconds, and we'll see that on the
 23 screen.
 24 This is {INQ040657/4}. The bottom half of the page,
 25 please. We can see that this call has started at

2

1 23.30.19, so a little before the image that we've just
 2 seen, and we see you say:
 3 "Hi Rach. Yeah."
 4 And then you give an account:
 5 "All right, well we've cleared the concourse and got
 6 containment on that. What I'm not happy is that we've
 7 not cleared the rest of the building and we've got one
 8 outstanding."
 9 So am I right you appear to be making clear there
 10 that you have containment of the City Room?
 11 A. Yes, sir.
 12 Q. You are concerned about the balance of the arena
 13 building, in particular the bowl?
 14 A. Yes.
 15 Q. And at that stage, you consider that you have one
 16 outstanding, do you mean one suspect outstanding?
 17 A. Yes, sir.
 18 Q. "So whilst I've deployed Merseyside to Piccadilly and
 19 I'm going to put an armed cordon on there — but we need
 20 to coordinate an evacuation of Piccadilly potentially,
 21 unless we go with containing it and hold it whilst we
 22 find out what's going on."
 23 And you go on to a further discussion with her. So
 24 your concerns at that stage appear to be the following:
 25 the arena more generally?

3

1 A. Yes.
 2 Q. Piccadilly Railway Station?
 3 A. Yes.
 4 Q. And the fact that there is still, at least potentially,
 5 another suspect who may be armed or may be equipped with
 6 a bomb?
 7 A. Yes.
 8 Q. And you are at that stage seeking to address each of
 9 those situations; am I correct?
 10 A. Yes.
 11 Q. {INQ040657/5}, the top half of the page. It's now
 12 23.32.08. Can you see that you have a discussion with
 13 one of the firearms officers?
 14 A. Yes.
 15 Q. That's PC Lee Moore. Are you aware that we have heard
 16 evidence from him?
 17 A. I am, sir, yes.
 18 Q. So he was the officer who was first into the City Room,
 19 carried out a sweep, satisfied himself there was no
 20 active shooter and thereafter he was to become involved
 21 in a significant way in the search of the balance of the
 22 building.
 23 A. Yes.
 24 Q. Your conversation with him is short and to the point.
 25 You say:

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1 "Are we declaring this warm?"
 2 And he says, "Yes". Do you see that?
 3 A. Yes.
 4 SIR JOHN SAUNDERS: We know that you have made/appointed him
 5 OFC for the search of the arena bowl.
 6 A. Yes.
 7 SIR JOHN SAUNDERS: So what are you referring to, "Are we
 8 declaring this warm?"
 9 MR GREANEY: Just before that question is answered, I can
 10 probably give the officer a bit more assistance with
 11 that, because obviously you're thinking back some time.
 12 I'm going to help you with the stage at which you say
 13 this and where you're talking about. I am sorry to
 14 interrupt you, sir. It might be, in the result, this is
 15 a better way of dealing with it.
 16 You told us yesterday that by this stage you had
 17 concluded that the City Room was to your own mind warm,
 18 not hot?
 19 A. Yes, sir, that's my recollection.
 20 Q. And your recollection was also that you had had
 21 a discussion, probably with the OFC, PC Richardson,
 22 about that, albeit before the dictaphone had been turned
 23 on?
 24 A. Yes.
 25 Q. At the stage at which you have this conversation with

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1 PC Lee Moore, you are probably, from the CCTV images
 2 we have, either walking through the station to Station
 3 Approach or you have just reached Station Approach. So
 4 that's where you are. You're not in the City Room, not
 5 on the overbridge, you're almost certainly not on the
 6 stairs, you're in the station itself or you're just on
 7 Station Approach. Does that make sense?
 8 A. Yes, it does, sir.
 9 Q. So when you in this discussion refer to, "Are we
 10 declaring this warm", to which do you think you are
 11 referring?
 12 A. I think I'm talking -- I think as I'm walking, my
 13 recollection is that I've walked back with him over the
 14 bridge, down the steps towards the entrance at the war
 15 memorial. I think I'm looking at the casualty clearing
 16 area and back.
 17 Q. You're looking at the?
 18 A. Casualty clearing area that was set up, which was just
 19 inside, wasn't it?
 20 Q. Yes?
 21 A. And back, so potentially, as I'm talking, I'm sweeping
 22 back and describing, "Is this warm?" I think we've come
 23 out of the City Room, walked down the bridge, and we've
 24 got all the activity at the war memorial and I think --
 25 and you may be able to clarify this from the CCTV --

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1 I think I'm talking about that general area of the CCA.
 2 Q. You're certainly there or thereabouts at the time you're
 3 saying that.
 4 A. Yes.
 5 Q. So you'd decided the City Room was warm. You're now
 6 in the station. Are you looking back from the area of
 7 the war memorial into the railway station concourse area
 8 and talking about that area?
 9 A. Yes, sir.
 10 Q. So that means warm in the City Room, warm within the
 11 station, and had you also come to the view that the
 12 overbridge area and staircase, that was also warm?
 13 A. Yes, essentially anything beyond the threshold of the
 14 doors of the war memorial I have said was warm. I think
 15 the conversation's probably taken place in the City Room
 16 and continued as I've walked back.
 17 Q. I see. In fact the officer that you walk down with is
 18 PC Richardson. So there is some confusion in the
 19 documents whether this conversation is with him or with
 20 PC Moore. It probably doesn't matter a great deal. But
 21 what is clear is you are at this stage declaring, to use
 22 your word, that area warm?
 23 A. Yes.
 24 Q. Now I'm clear. You have used there the term "declaring
 25 this warm", but do you agree that you make no broadcast

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1 over the radio to that effect?
 2 A. Yes.
 3 Q. From the dictaphone recording it seems that you told no
 4 representative of any other emergency service about that
 5 declaration at that time.
 6 A. Yes, not immediately, no.
 7 Q. Not immediately. In fact, it is some time later, as
 8 we're going to see, when you first had that discussion:
 9 it's gone midnight. So I'm going to suggest there are
 10 a number of possibilities for what is happening, and
 11 there may be others.
 12 One possibility is that because you are so busy you
 13 just don't get around to telling the paramedics at that
 14 stage. Alternatively, you just didn't think it was
 15 important to do so. Or thirdly, that you made
 16 a deliberate decision not to tell emergency service
 17 partners, at least not proactively, and at that stage.
 18 There may be other possibilities but I'm going to
 19 ask you to indicate what your thought processes were
 20 about informing others.
 21 A. On reflection, I think it's because the zoning is not
 22 actually affecting the deployment of the resources. So
 23 had it been an active shooter, the imperative to brief
 24 fire and ambulance on the status of the zoning becomes
 25 very, very important because of the obvious reason,

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1 because it would control who goes into what areas. But
 2 because we've declared warm more to articulate risk,
 3 that it wasn't actually changing the deployments of
 4 protected or specialist responders at the scene, it
 5 wasn't massively relevant or critical at the time.
 6 Q. It sounds as if it's probably a combination of the first
 7 two possibilities ?
 8 A. Yes.
 9 Q. It wasn't important because it wasn't going to have an
 10 impact on what was actually occurring and you had many,
 11 many other things to be doing at the same time?
 12 A. And there's another aspect to this: a lot of that should
 13 have been done earlier. So maybe in my own mind I was
 14 presuming that an hour in that these conversations may
 15 have been already had.
 16 Q. Yes. I think, to be fair to you, on the face of it, it
 17 couldn't reasonably be suggested that you were
 18 concealing this from anyone because, as we're going to
 19 see a little later, you search out the Bronze commander
 20 for NWS and have a discussion in which you talk to him
 21 about zones.
 22 A. Yes.
 23 Q. How clear you are is a different matter, but we'll get
 24 to that in due course.
 25 SIR JOHN SAUNDERS: I'm really sorry, but please can you

1 just remind me of the time at which the last casualty is
 2 removed from the City Room?
 3 MR GREANEY: 23.40, I believe, sir.
 4 SIR JOHN SAUNDERS: We know that paramedics were operating
 5 on the basis that they could operate from the bottom of
 6 the stairs safely --
 7 A. Yes.
 8 SIR JOHN SAUNDERS: -- but not actually on the overbridge
 9 area.
 10 A. I wasn't aware of that until seeing the evidence.
 11 SIR JOHN SAUNDERS: But they were in reality both warm
 12 areas?
 13 A. Yes.
 14 MR GREANEY: I'm going to move on in time, sir, unless there
 15 are further questions.
 16 SIR JOHN SAUNDERS: That's fine, thank you. I just wanted
 17 to -- that seemed to be of some significance as to who
 18 was being told what and when.
 19 MR GREANEY: Exactly and these are matters certainly that
 20 will be important to explore with Mr Smith and Mr Ennis
 21 next week.
 22 Could we have on the screen again, please, the
 23 sequence of events, this is {INQ035612/344}.
 24 So we can see that now, very shortly after your
 25 conversation with the OFC about zones, you are outside.

1 It's 23.32.46 and you're still with PC Richardson, so it
 2 seems likely that the discussion that you've had about
 3 zones was with him, not with PC Moore; do you agree?
 4 A. Yes, sir, yes.
 5 Q. So you're outside by this stage. Again, you are seen to
 6 be on the telephone and we'll get to that call in
 7 a moment. But what has been your purpose in leaving the
 8 City Room to go to Station Approach?
 9 A. I think, as I recall, and I've maybe seen this in some
 10 of the transcripts I said we needed to go to the FCP and
 11 find out what was going on there.
 12 Q. You make a mention in the call about the FCP but in fact
 13 the point at which you say, "I want to go to the FCP and
 14 see what is going on", that comes later. Let's look at
 15 the call.
 16 We'll have on the screen the transcript, Mr Lopez,
 17 {INQ040657/5}, the page we have just had. The call
 18 you are engaged in at the stage we have just seen is
 19 with Dave Murtagh. Who is he, please?
 20 A. Dave was an inspector, he was the CTSFO inspector in
 21 Greater Manchester, so coordinated and managed our CTSFO
 22 capability.
 23 Q. I'm not going to get into which is operationally
 24 sensitive, but there was a CTSFO deployment that night?
 25 A. There was, yes.

1 Q. An extensive one, indeed. Were you liaising with him
 2 about how his resources might best be used?
 3 A. I was.
 4 Q. So you can see you say:
 5 "We've got a sus male outside the cathedral. Are
 6 you aware of it?"
 7 Obviously we're not seeing what he is saying to you:
 8 "Yeah, so a suspect male, male Asian, outside the
 9 cathedral with a backpack. Now ARVs have been...
 10 Yeah -- right I have just tasked some of yours to go and
 11 secure the arena itself, because We have still got
 12 people in there."
 13 And you're talking again, are you, about the arena
 14 bowl?
 15 A. Yes.
 16 Q. "If you have got a team that you can send down to that
 17 one and we'll do a foot interception on that individual
 18 and we can ID him."
 19 Are you seeking a deployment of CTSFOs to intercept
 20 that particular individual?
 21 A. Yes. I think at that point I've heard a transmission
 22 that there's an Asian male with a backpack at
 23 Cathedral Gardens and probably, for reasons that are
 24 operationally sensitive, there's a better reason to
 25 deploy CTSFOs to deal with that than ARVs.

1 Q. We'll all understand there are particular reasons why
2 they are going to be better placed to deal with that
3 kind of situation .
4 SIR JOHN SAUNDERS: No criticism, but are you going beyond
5 really your area of responsibility at this stage? I'm
6 really not criticising , I just wanted to know.
7 A. I think it's fair to say there's some overlap, but no,
8 as a ground--assigned TFC you have some geographical
9 responsibilities , and one of those would usually come --
10 and I accept the command protocols were not 100% clear
11 on this night. But the ground--assigned TFC would have
12 a command protocol that usually would include anything
13 that's an immediate threat to life , so that would come
14 to me because of the ability to understand it. Now, the
15 relationship between me and the TFC in the room would be
16 that if the TFC's got intelligence, countering what we
17 think about that or vice versa if I'm countering what
18 he's saying, that's when that conversation takes place.
19 But you could in a command protocol deal with that under
20 the ground--assigned.
21 MR GREANEY: You can well understand the point the chairman
22 is making. Obviously, the FDO is still at that stage
23 the ITFC, so he is the tactical firearms commander,
24 you're the ground--assigned tactical firearms commander
25 but you are not just dealing with the arena or station,

13

1 you're deploying assets to the cathedral, that's not far
2 away, to Piccadilly and ultimately, as we're going to
3 see, to a hospital in Oldham.
4 A. Yes.
5 Q. So there was, and I'm using this term deliberately, some
6 crossover in the command responsibilities of you and the
7 TFC?
8 A. Yes.
9 Q. Was that a problem?
10 A. No, I don't think it was a problem. I think it was --
11 I think Dale cleared it up later on actually, but it's
12 -- he can hear what I'm doing, he's on the same radio
13 channel, and in a slower--time incident which we are used
14 to dealing with, you know, most of our firearms
15 operations tend to be much slower in pace, but the pace
16 of this and the risk that that potentially is, you go
17 and do it. But I think I would accept the command
18 protocol wasn't as clear as it could have been. But
19 yes, I agree --
20 SIR JOHN SAUNDERS: I understand the important thing is to
21 get it done, and it was done and that's good, and it
22 didn't cause confusion, it's really just looking at
23 potential --
24 A. Yes, and that's why the command protocol is there, to
25 try and eliminate those confusions, so yes, and I would

14

1 accept that point.
2 MR GREANEY: Is what was happening that the FDO is the ITFC
3 but, I don't know if you appreciated that night, but he
4 was unbelievably busy and became overburdened?
5 A. I knew he was busy because I could hear the radio.
6 Q. So is what was happening that maybe he was the one who
7 ought to have been deploying assets to Piccadilly and
8 Oldham and to other hospitals, but because he was so
9 busy you had to step into that void?
10 A. Yes. In an ideal world we'd have had a conversation to
11 say: we've got this incident, this situation, at
12 Cathedral Gardens, Dale, am I dealing with or are you
13 dealing with it? That's the idea.
14 Q. And it worked that night because, as it turned out, you
15 were on it, but it worked because you were there and
16 in the future there might not be you or someone with
17 your capabilities . That is how it creates a problem,
18 isn't it?
19 A. Potentially, yes.
20 SIR JOHN SAUNDERS: There actually appears to be, having
21 heard the evidence from the assistant chief constable,
22 a slightly different attitude that you're taking to the
23 one that the Silver control room is taking.
24 A. Yes.
25 MR GREANEY: A little bit further down that page,

15

1 {INQ040657/5}, your call with Inspector Murtagh
2 continues. I think you discover that he isn't in the
3 immediate area.
4 A. That's correct.
5 Q. And you tell him, not to worry, you will sort it. Then
6 you say:
7 "I would get them, yeah, get them to come to the --
8 pick a forward command point in town which I would
9 probably say is Selfridges."
10 When you use the term forward command point, were
11 you using that term in its technical sense?
12 A. I've used the wrong term. I meant an RVP.
13 Q. An RVP. Well, I had wondered if that was what you
14 meant. So were you saying that the CTSFOs should
15 rendezvous at Selfridges?
16 A. Yes. So for context, they've -- the network provides an
17 on--call coordination function, to mobilise CTSFO assets
18 around the country and that's the conversation we had:
19 where do you want me to send them?
20 Q. And as many will know, Selfridges is very near indeed to
21 the cathedral?
22 A. Yes.
23 Q. Very shortly afterwards, the OFC, who as we have seen is
24 with you, says to you -- and he does return to this
25 again:

16

1 "We've only got two armed here, we need more armed
 2 here."
 3 And you say:
 4 "Okay."
 5 So this is on Station Approach still. He's saying,
 6 "We've only got two armed", does he mean two armed
 7 officers or two ARVs?
 8 A. It could be just two AFOs. I couldn't be sure. But
 9 they weren't in the vehicles, so it could be two
 10 officers.
 11 Q. So what was, as you understood it, the concern that he's
 12 expressing?
 13 A. Safety around the FCP area and the casualty clearing
 14 area.
 15 Q. So where was the FCP to your mind?
 16 A. Just outside the doors as you go in -- is the war
 17 memorial on the left as you walk through?
 18 Q. The entrance that you went through to get into the
 19 station, that was the war memorial entrance?
 20 A. Yes.
 21 Q. And that's the exit through which you went?
 22 A. Yes, and that was where the casualty clearing station
 23 was and I had the FCP in my mind just outside on the
 24 pavement.
 25 Q. So we have understood that the FCP in a Plato situation

17

1 is a very important location.
 2 A. Yes.
 3 Q. This is where the commanders meet, so they co-locate?
 4 A. Yes.
 5 Q. They coordinate, communicate, they come to a shared view
 6 about what's happening in the situation and they jointly
 7 assess risk?
 8 A. Yes.
 9 Q. I think I've hit the principles of JESIP there. So that
 10 was what should have been happening at that location?
 11 A. Yes.
 12 Q. How did that location become the FCP? Did you set it,
 13 did someone else set it?
 14 A. My recollection is that I was told about it and I can't
 15 think -- and I've gone through the transcripts and other
 16 statements. I cannot find where that's come from. But
 17 for some reason, I went to that location thinking that
 18 to be the FCP, or where the OFC would be, which
 19 virtually is one and the same.
 20 Q. You plainly later on believe that that is the FCP.
 21 A. Yes.
 22 Q. There's no doubt about that.
 23 A. I honestly couldn't tell you why I knew that. It could
 24 be, as I've said yesterday, that I have seen ambulance
 25 there and the tabards and I have made the connection.

18

1 Q. Would that have been a sensible place for an FCP?
 2 A. For a Plato FCP, yes.
 3 Q. We're only at {INQ040657/5} and there are 72 pages of
 4 this, but can I assure you and everyone else, we are
 5 going to pick up a good deal of speed now.
 6 Having been told that by PC Richardson, you attended
 7 to it, and you then took steps to deploy assets to
 8 locate the second man.
 9 Then, at 23.38, still I think on Station Approach,
 10 you had a conversation with Superintendent Leor Giladi
 11 who is someone who, as you may know, has given to the
 12 inquiry.
 13 A. Yes.
 14 Q. This takes us to {INQ040657/9} of the transcript. You
 15 say to him:
 16 "Hiya mate okay?"
 17 Was he someone who was well known to you?
 18 A. Reasonably, yes.
 19 Q. "It's a full Plato; they've exploded a bomb at the MEN,
 20 Take That..."
 21 And I think throughout the course of that night you
 22 thought Take That had been the concert?
 23 A. Yes. Like yourself, I'm not familiar with
 24 Ariana Grande. Or I wasn't at the time.
 25 Q. "Suicide, a suicide bomb, but we've got one

19

1 outstanding."
 2 That's the person that you've deployed assets to try
 3 and intercept:
 4 "So I'm ground-assigned, Rachel's in the control
 5 room, I've turned Craig out."
 6 Is that Craig Thompson?
 7 A. Yes, correct.
 8 Q. "Chris Hill is going to take unarmed Silver. We've got
 9 Plato."
 10 You then make a reference to other types of asset:
 11 "But at the minute I think we're fairly contained
 12 unless we start getting another threat moving."
 13 So do you mean that by that stage, you've got that
 14 particular location, the City Room -- and the arena more
 15 generally -- and the station under control?
 16 A. Yes.
 17 Q. And you're okay unless you get another threat?
 18 A. Yes.
 19 Q. You then give a description of the male that you're
 20 looking for, you describe the number who are known by
 21 that to be dead. He is plainly then saying to you,
 22 "Shall I turn out?" and you say:
 23 "It's your call but you might be needed in the
 24 morning."
 25 A. Yes.

20

1 Q. Is this a point that we see a number of times through
 2 the evidence that you can't deploy every single police
 3 officer to this incident because otherwise you'll have
 4 no one available for the next day?
 5 A. You have to look forward, yes.
 6 Q. "We're just having a debate [you say] in our heads
 7 whether Rachel can take the TFC or whether you want
 8 a specialist overnight, just in case, in the room and
 9 Craig's turning in."
 10 Is that what you've told us about earlier?
 11 A. It is, yes.
 12 Q. Let's move to the next period of time, so 23.40 to
 13 23.50.
 14 At 23.41 you had a discussion with ACC Ford. This
 15 is an important conversation. We listened to it either
 16 yesterday or the day before yesterday with ACC Ford as
 17 she was. It's the conversation in which there is
 18 a reference to fire.
 19 A. Yes.
 20 Q. I am going to ask that it be played again. I'll give
 21 the same warning that I gave before, that a siren can be
 22 heard at one stage. This is the first of, I think,
 23 about six clips that I'm going to play during the course
 24 of my questioning. I have listened to each of them
 25 again, I don't believe there is anything overtly

1 distressing in the background.
 2 So we'll listen to it and we'll have the transcript
 3 on the screen, Mr Lopez. The recording is
 4 {INQ025479A/1}. We'll play it from 13:58 counter time
 5 to 17:05. On the screen can we have at the same time,
 6 please, the transcript, which is {INQ025409/10}, the
 7 bottom half of that page, please.
 8 (Audio played to the inquiry)
 9 Obviously we're only hearing here your side of that
 10 telephone conversation. You're plainly giving an update
 11 to the Gold commander about what is happening at the
 12 scene and the steps you have taken in relation to the
 13 command structure. What I want to ask you about is
 14 something I asked DCC Ford about. You say:
 15 "We've got no fire -- you may as well -- we may as
 16 well -- but NWS appear to be coping."
 17 And I do appreciate that this is a conversation, one
 18 of many, you had that night and that it was some time
 19 ago now. Mr Wood yesterday put a particular set of
 20 propositions to ACC Ford, as she was, about this
 21 conversation. Let me ask you for your evidence. First
 22 of all, when you said, "We've got no fire", to what were
 23 you referring?
 24 A. Fire Service, GMFRS.
 25 Q. How do you remember, if you remember at all, that your

1 ACC responded?
 2 A. If I'm being truthful, I can't remember the conversation
 3 either. The only reason I recollect this now is because
 4 I've been able to listen to the audio. But in my view,
 5 and I can understand why DCC Ford might not remember
 6 it --
 7 SIR JOHN SAUNDERS: Okay, just give us your view.
 8 A. My view is that conversation naturally flows -- I've
 9 raised that there's no fire, she has indicated she'll
 10 put that right, and I have said, "You might as well".
 11 SIR JOHN SAUNDERS: So this is your surmise from your part
 12 of the conversation --
 13 A. Yes.
 14 SIR JOHN SAUNDERS: -- and what you would be thinking about
 15 at the time?
 16 A. I can't... I can't imagine how the conversation would
 17 flow another way. I could understand why she wouldn't
 18 recall it because there was a lot going on and she was
 19 probably busier than I was.
 20 SIR JOHN SAUNDERS: You both make excuses for the other all
 21 the time. We'll take on board the excuses and just tell
 22 us your --
 23 A. My perception of that conversation was that I raised
 24 that there was no Fire Service there and I think she
 25 sought to put it right.

1 SIR JOHN SAUNDERS: Thank you.
 2 MR GREANEY: But I think it would be correct to say that at
 3 that stage, underlining those words, you weren't
 4 particularly concerned by the absence of the Fire and
 5 Rescue Service because those who needed to be taken out
 6 of the City Room had been?
 7 A. Yes. Whether that's right or not is another issue, but
 8 that was my perception.
 9 Q. Absolutely. What you said to Kerslake, and we can look
 10 at it if necessary, was that you had become aware pretty
 11 quickly that the Fire and Rescue Service were not
 12 there --
 13 A. Yes.
 14 Q. -- but that you weren't particularly concerned because
 15 the necessary extractions had taken place.
 16 A. Yes, certainly by that point it wasn't as important as
 17 it had been.
 18 Q. By that point, as I indicated to the chairman earlier,
 19 the last person who could be helped by being removed
 20 from the City Room had been removed because that
 21 happened almost 5 minutes before this conversation.
 22 Were you aware -- I'm not talking about that point
 23 in time I'm talking about an earlier point in time or
 24 perhaps more generally at this stage -- were you aware
 25 at a general level of what the Fire and Rescue Service

1 could offer in a situation such as this where there were
 2 casualties in an area that needed removing?
 3 A. I was aware of the MTFA response capability they had, so
 4 I was broadly aware that that's why we'd bring them into
 5 a Plato. Whether I knew the intricacies of what they
 6 could actually do is a different thing.
 7 Q. But you knew in general terms they could provide trauma
 8 treatment?
 9 A. Yes.
 10 Q. And that they could remove people that needed to be
 11 removed?
 12 A. Yes.
 13 Q. And although certainly the removal of people wasn't
 14 an issue by the stage that you're saying this, can we
 15 assume that if you had been there earlier when there
 16 were casualties in need of treatment and removal from
 17 the City Room, you would have had a very different view
 18 about the absence of the Fire and Rescue Service?
 19 A. It naturally follows that way, yes.
 20 SIR JOHN SAUNDERS: I don't want to suggest anything, this
 21 is just an enquiry and please treat it that way, but one
 22 of the other possible responsibilities or capabilities
 23 of the Fire Service relates to structure.
 24 A. Yes.
 25 SIR JOHN SAUNDERS: We have heard talk about the roof, the

25

1 glass roof coming in. I'm really not trying to suggest
 2 that you might have thought of that, but did you?
 3 A. I had no idea.
 4 SIR JOHN SAUNDERS: Okay, thank you.
 5 MR GREANEY: That's all I want to ask you about that call;
 6 others, of course, may ask you other questions.
 7 Mr Lopez, I think the delay before might have been
 8 my fault, not yours, because I didn't give you a very
 9 good transcript reference. I will give you the
 10 transcript that I'm working to now. I'd like you to
 11 take us to page 12 of it. It is {INQ040657/12}.
 12 It's now 23.45.06. You're still, I think, on the
 13 Station Approach, or thereabouts, and you have
 14 a conversation with the OFC. The top of the page,
 15 please, Mr Lopez. I'm going to ask you about one part
 16 of it.
 17 The OFC says to you:
 18 "We have just got an explosives dog from BTP.
 19 They're at the Victoria Street entrance."
 20 And this is the arrival of Mojo. And you ask:
 21 "Are you okay going in?"
 22 And the BTP dog handler, Phil Healy, indicates that
 23 he is. And the OFC takes responsibility for directing
 24 where he's going.
 25 Now, do you agree that the need for explosives dogs

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1 was a theme that night?
 2 A. Yes.
 3 Q. Can you just explain how that seemed from your
 4 perspective?
 5 A. I probably wasn't consciously aware of what we had in
 6 terms of explosives dogs, and I think people have said
 7 it before as well about how time passes very quickly
 8 under pressure, so my perception actually was I was
 9 surprised to see one so early, because they're not
 10 always necessarily readily available because of the way
 11 we work and some of the work we do. But the capacity
 12 issues around explosives dogs became quickly apparent.
 13 Q. This is 1 hour and 14 minutes after the explosion.
 14 Obviously everyone can understand that an explosives dog
 15 isn't going to be immediately to hand. When you say
 16 that you were surprised that one was there so early, do
 17 you mean you were surprised that one got there as early
 18 as 1 minute and 14 seconds (sic) after the explosion or
 19 do you mean you were surprised, given your perception of
 20 time, that one had got there so early?
 21 A. Probably the latter, the perception of time.
 22 Q. Thereafter, so from 23.45, you returned to the City Room
 23 and we can see images of you doing so. This is the
 24 sequence of events, Mr Lopez, {INQ035612/388}?
 25 SIR JOHN SAUNDERS: While that's coming up, I'm just going

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1 back to your conversation with the assistant
 2 chief constable. You're feeding her information, which
 3 is also information which you would be needing to feed
 4 to the FDO --
 5 A. Yes, in theory, yes.
 6 SIR JOHN SAUNDERS: -- because he's still the ITFC?
 7 A. Yes.
 8 SIR JOHN SAUNDERS: So you're having to feed information in
 9 two directions?
 10 A. Yes.
 11 SIR JOHN SAUNDERS: Whereas had the TFC, who we know
 12 actually was already in the Silver control room, had
 13 taken over that role, you'd be communicating in one
 14 direction only?
 15 A. Yes. In theory it should be quite linear. But I think
 16 Debbie was quite --
 17 SIR JOHN SAUNDERS: I know we're talking about the
 18 practicalities on the night.
 19 A. -- hungry for information, I think.
 20 SIR JOHN SAUNDERS: It's obviously better the sooner the TFC
 21 is in the same room as the Gold, the better.
 22 A. Yes, yes.
 23 MR GREANEY: So there you are. You're just starting to make
 24 your way back into the station at 23.46.04.
 25 {INQ035612/389} next, please. There you are on the

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1 stairs leading to the overbridge.
 2 {INQ035612/391}, please. We can see you at 23.47
 3 nearing the City Room.
 4 {INQ035612/392}, please. Now you're in the
 5 City Room and you're in fact with the dog handler from
 6 BTP, Phil Healy, who we mentioned a moment ago.
 7 Then {INQ035612/394}. There you are having
 8 a conversation with Inspector Mike Smith, the Bronze.
 9 A. That's correct.
 10 Q. Thank you. We can take that off the screen, please.
 11 That's 23.47. You remain there for not long short
 12 of half an hour because you leave at 00.14 hours.
 13 During a portion of that period, up to 23.50, you were
 14 concerned with addressing the need for there to be
 15 a search of the arena bowl?
 16 A. Yes.
 17 Q. You were concerned with controlling the events at
 18 Piccadilly Railway Station?
 19 A. Yes.
 20 Q. And at 23.50 hours, the OFC confirmed to you that those
 21 who needed to be removed from the City Room for
 22 treatment had all been removed?
 23 A. Yes.
 24 Q. So although we're skipping over it, I don't for a moment
 25 want to suggest that you weren't extremely busy during

29

1 that period, but those are the general topics that you
 2 were dealing with?
 3 A. Yes.
 4 Q. So let's turn next to the period from 23.50 to midnight.
 5 You're still within the City Room during that period.
 6 At 23.52, you had a conversation by phone with the
 7 FDO. We've touched on this already. You had your
 8 dictaphone recording, he had his dictaphone recording,
 9 and so we have both sides of the conversation. We'll
 10 look at them and try to piece together what was being
 11 said.
 12 So first of all, we'll look at his, so Mr Sexton's
 13 side of the conversation. This is {INQ040526/12}. On
 14 that page, it's line 66, please.
 15 It's timed at 23.53 on this. The timing on your
 16 transcript is a little different:
 17 "Mark, it's Dale."
 18 So this is Mr Sexton, it seems, making contact with
 19 you:
 20 "I'm very much aware we're crossing over each other
 21 on command and control."
 22 So we can see now why I emphasised that particular
 23 phrase earlier, crossing over:
 24 "Are you happy to take command and control from the
 25 scene as far as deployment? Right, yeah, no, I'll speak

30

1 to Rach [Rachel Buckle, in context]. I have asked her
 2 to think about when she'll be taking over from me but if
 3 you manage the MEN now and then I'll speak to Rachel
 4 about Piccadilly. I'm waiting for them to come back to
 5 me, they haven't, right, I've got [a reference to
 6 a particular form of asset] here, I'll speak to Pete
 7 once he's off the radio, find out what's happening and
 8 give you a ring back. Okay. Sorry -- if they're
 9 coming -- yeah, okay, no problem, cheers, bye."
 10 So obviously it's quite difficult to understand some
 11 of what he's talking about just from that side, but
 12 we'll look at your side of the conversation. This is
 13 {INQ040657/18}.
 14 I think we can see your side:
 15 "Hello, Mark Dexter. Are you all right? Yeah."
 16 It's apparent that, just before your next comment,
 17 Mr Sexton has made his reference to crossing over so far
 18 as command and control are concerned and you say:
 19 "I'll take command at Victoria and the MEN. I think
 20 you just need to clarify who has got Piccadilly.
 21 I think it's a conversation with Rachel about
 22 Piccadilly."
 23 And we've heard that he then says he's going to
 24 contact Chief Inspector Buckle about that:
 25 "Okay. I'll manage the scene, yeah."

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1 Which scene are you talking about?
 2 A. The arena.
 3 Q. "All right. Where are we with [that particular military
 4 asset]? I tried them on the briefing channel but had
 5 nothing from them. All right, mate."
 6 And then there's talk about where particular people
 7 are going to go.
 8 We have in fact touched on this and perhaps dealt
 9 with it earlier, but can you understand why the FDO
 10 thought that the two of you were crossing over in terms
 11 of command and control?
 12 A. Yes.
 13 Q. This takes us back to the point that you were making
 14 earlier that you can foresee how that might create
 15 difficulties in some situations, but on that night it
 16 didn't because of the work that you did?
 17 A. Yes.
 18 Q. We can see that you were saying at that stage:
 19 "I think you just need to clarify who has got
 20 Piccadilly."
 21 That takes us back to another point I asked you
 22 about early. This is 32 minutes after armed assets have
 23 been deployed to Piccadilly. Was it unsatisfactory that
 24 there still was not clarity in relation to who had "got
 25 Piccadilly"?

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1 A. Yes.
 2 Q. Thereafter, and I'm still dealing with the period 23.50
 3 to 00.00, you were heavily involved in discussions about
 4 the scale of the task involved in searching the entire
 5 arena with Sergeant Warburton?
 6 A. That's correct, yes.
 7 Q. He perhaps colourfully captured what a task it was when
 8 he said it was "fucking massive".
 9 A. Yes.
 10 Q. That task in fact involved you speaking again to
 11 ACC Ford at 23.54. We don't need to show it on the
 12 screen because there is an aspect of the discussion that
 13 might distress. But at that time, 23.54, you said to
 14 her, and this seems to have been the purpose of your
 15 call:
 16 "Can you do me a favour? Can you go to mutual aid
 17 for explo dogs?"
 18 A. Yes.
 19 Q. So were you seeking to secure explosives dogs from other
 20 forces?
 21 A. Yes, sir.
 22 Q. Because the scale of the task of searching the arena was
 23 such that you needed such animals to be there?
 24 A. Yes.
 25 SIR JOHN SAUNDERS: And at that time, you got one from BTP

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1 but none from GMP?
 2 A. I couldn't be... I couldn't be 100% about that.
 3 MR GREANEY: I think that is right, sir.
 4 SIR JOHN SAUNDERS: We'll check obviously. Thank you.
 5 MR GREANEY: If we can have the transcript on the screen at
 6 this stage, please. We are still in that period up
 7 until midnight, but just before midnight.
 8 {INQ040657/23}, please.
 9 At this stage you had a conversation by telephone
 10 with Jim Allen, as you call him during the recording,
 11 but James Allen as we know him, the general manager of
 12 the arena. This is now 23.58.29. Why was it that you
 13 wanted to speak to the general manager of the arena?
 14 A. A couple of reasons, really. I wanted to know from
 15 their own perspective how confident they were that it
 16 had been evacuated and there was nobody else in there.
 17 And I talk about CCTV, don't I, I think?
 18 Q. You do mention CCTV:
 19 "Jim, is there anything you'd be able to do
 20 CCTV-wise outside block 106 to see what happened and see
 21 if we've got anybody else?"
 22 What were you asking for there?
 23 A. I was seeing if they had captured the incident on camera
 24 and I had to see if we could confirm whether he was with
 25 anybody else when he did it -- or immediately prior to.

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1 Q. And again, we're capturing only your side of the
 2 conversation. Can you remember what he said to you?
 3 A. As I recall, he did confirm that they had a CCTV room.
 4 As it happens, I think we'd actually already got
 5 somebody in there, but I think essentially he said,
 6 "We'll make some arrangements for you to be able to see
 7 it".
 8 Q. We'll turn next to the period from midnight to 00.23,
 9 which marks the point at which you've been at the arena
 10 for 1 hour. During that period, you leave the City Room
 11 and return to Station Approach.
 12 So over the page of the transcript, {INQ040657/24}.
 13 SIR JOHN SAUNDERS: Just while we're there, why in
 14 particular are you spending all that time in the
 15 City Room rather than being at the forward control
 16 point? It may be something that --
 17 A. In hindsight I probably should have gone back earlier.
 18 I didn't realise I'd been there half an hour. I'd had
 19 quite a few conversations with Fred Warburton --
 20 SIR JOHN SAUNDERS: You certainly were doing things, it's
 21 just whether you could have done them downstairs.
 22 A. I think -- and this comes out around communications --
 23 the radio channels are so busy in that situation, you
 24 can't have meaningful conversations about what you want
 25 to be done, so you go face to face. I think the use of

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1 an FCP, I don't think there's any expectation that you
 2 should be firmly planted there permanently, I think it's
 3 a place where you go back and meet and regularly meet.
 4 You can -- I think there is that flexibility to go in
 5 and get things done because there has to be recognition
 6 of communicating on the Talk Group is difficult at the
 7 best of times but under these circumstances it's almost
 8 impossible.
 9 On reflection, if I'd known -- I think I screwed my
 10 face up when he said 30 minutes, I didn't realise I'd
 11 been there 30 minutes and I probably should more
 12 regular --
 13 MR GREANEY: I will check that's right, but I think on the
 14 basis of the images we've got it's (overspeaking) --
 15 A. (Overspeaking) I think it's just the reality of getting
 16 drawn into doing things.
 17 SIR JOHN SAUNDERS: I do understand about reality, but you
 18 know we need to look at theory as well.
 19 A. Absolutely, yes.
 20 SIR JOHN SAUNDERS: So what has been suggested about --
 21 obviously commanders can't be there all the time at the
 22 forward control point, but they would have someone
 23 posted there who could at least provide a liaison with
 24 the other commanders.
 25 A. Yes.

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1 SIR JOHN SAUNDERS: So that's the other thing, you could
 2 have had somebody there, posted there, you said
 3 (overspeaking) tell me if you need anything --
 4 A. Yes. Actually, in the major incident plan you have
 5 an FCP manager.
 6 SIR JOHN SAUNDERS: Yes, okay. Right.
 7 MR GREANEY: {INQ040657/24}. This is in fact going to pick
 8 up on something I think you have just referred to.
 9 Halfway down the page you make a call at exactly
 10 midnight or 53 seconds past midnight:
 11 "Right, can you do us a favour?"
 12 It's not clear from the transcript to whom you're
 13 speaking:
 14 "I know it sounds ridiculous, but look and see if
 15 we can activate the emergency mobile phone network,
 16 we're struggling with network coverage. Cheers, see you
 17 in a bit."
 18 So to what are you referring at that stage?
 19 A. There's a system -- I don't think this is sensitive, but
 20 there is a system where emergency workers' phones can be
 21 given prioritisation on mobile phone masts. If the
 22 masts are busy, by activating that system, it will kick
 23 off non-essential users and just open up better
 24 communication.
 25 Q. I know Mr Suter will be checking whether that is

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1 operationally sensitive. Thank you for flagging it for
 2 us.
 3 You, on a number of occasions subsequently, talk
 4 about a difficulty of communicating on Airwaves. Does
 5 it follow that you're talking about something different
 6 at this stage?
 7 A. This is the mobile phone network. I was getting
 8 frustrated I couldn't get through on my phone.
 9 SIR JOHN SAUNDERS: I understand the point of that. What
 10 we've also heard a lot of is how remarkably, maybe,
 11 families were able to communicate with their children
 12 from whom they'd inevitably got remote from, they were
 13 not connected with, they got hold of them on their
 14 mobile phone, so it was actually quite useful that
 15 members of the public weren't kicked off it.
 16 A. Yes. I don't think it automatically kicked them off.
 17 I think it prioritised the emergency service calls.
 18 SIR JOHN SAUNDERS: I'm not suggesting you did the wrong
 19 thing, but if we're thinking of the future, it is
 20 perhaps surprising how much communication there was
 21 between parents and children.
 22 A. That's probably why I couldn't get through on my phone.
 23 That's the principle of it is if the mast is -- each
 24 mast will have a finite amount of capacity. When it
 25 gets to capacity, it will prioritise the emergency

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1 services.
 2 SIR JOHN SAUNDERS: Right, thank you.
 3 MR GREANEY: You're going to tell us in due course about
 4 this other communication difficulty. I'm not asking
 5 anything that is controversial by saying obviously it
 6 was vital that you should be able to communicate with
 7 those that you needed to communicate with --
 8 A. Yes.
 9 Q. -- if the operation was going to be as successful as it
 10 needed to be?
 11 A. Yes.
 12 Q. We're going to move ahead now 3 minutes to 3 minutes and
 13 33 seconds past midnight. This takes us to
 14 {INQ040657/26}.
 15 I hope that I'm not, either for your purposes or
 16 anyone else's purposes, skipping over this too quickly,
 17 and I hope this is giving a clear impression at least of
 18 the work that the superintendent was doing.
 19 SIR JOHN SAUNDERS: It is for me and I hope it is for
 20 everybody else as well.
 21 MR GREANEY: At that time, this is the bottom half of that
 22 page from 00.03.33, you have another conversation with
 23 Gold, ACC Ford. You say:
 24 "Right, we've got the CCTV from the control room.
 25 They have tracked -- they have not got the explosion,

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1 but they have tracked him back and he appears to have
 2 come in alone."
 3 You then give a description of him and you say:
 4 "The assumption at the minute is acting alone."
 5 You then go on to say:
 6 "I'm fine resource-wise. Yeah, we're fine
 7 resource -- working on the assumption that he's alone,
 8 we are happy. Okay."
 9 Was that right, did you mean that you had adequate
 10 resources at the scene?
 11 A. I think so by that point in terms of firearms assets
 12 we were comfortable.
 13 Q. That was my question. Is that specific to firearms
 14 assets or are you talking also about unarmed assets or
 15 even about assets from other emergency services?
 16 A. I'm talking about -- narrowly about firearms assets
 17 really, I think.
 18 Q. I'm not going to go into numbers but you ended up with
 19 very substantial numbers of armed officers available
 20 within Manchester that night both from GMP and from
 21 surrounding forces?
 22 A. That's right.
 23 Q. Was it your view that, to that extent, the mutual aid
 24 worked extremely well?
 25 A. Brilliantly, yes.

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1 Q. "I couldn't tell you, to be honest, what -- where we are
 2 at the moment, we've explored the perimeter of the
 3 arena and that's clear."
 4 What area are you talking about there? I should
 5 read the next sentence because it perhaps indicates:
 6 "We can't vouch for the inside of the arena, but the
 7 assumption that it's not."
 8 A. I think I had -- was this prior to or... I think I had
 9 a conversation with Sergeant Warburton about the
 10 achievability of searching the bowl.
 11 Q. This is --
 12 A. Is this pre or post?
 13 Q. This just after the discussion with Sergeant Warburton.
 14 A. I think I've --
 15 Q. Although you had a number of discussions with him.
 16 A. And ultimately I settle on, based on the information
 17 I had from James Allen, the initial search that the
 18 CTSFOs had done of the arena bowl itself and the reality
 19 of the passage of time, whilst I couldn't say 100% that
 20 it was completely secure and nobody was hiding in there
 21 or anything like that, it was as good as I could get at
 22 that point. I think it led to me grouping them back
 23 together and putting them at the RVP, didn't it?
 24 Q. I think so, yes. Then if we go over the page, Mr Lopez,
 25 to the top of that page, this is an example of something

1 that the chairman was commenting upon earlier
 2 {INQ040657/27} that you were having to provide the same
 3 information to two people, notwithstanding the pressures
 4 upon you.
 5 At 00.04.58 you make radio communication with the
 6 FDO:
 7 "Roger. I think we'll probably hold them at the
 8 location for now, Dale. Just a quick update: it would
 9 appear from the CCTV he's acted alone. So we're on
 10 the -- the working assumption at the moment is he's
 11 alone. We are not looking for a second person at the
 12 moment. If that changes clearly -- well, that will
 13 change the decision around... It's an Asian male with
 14 a beard and a large rucksack that entered the
 15 forecourt."
 16 By that stage, were you discounting the significance
 17 of the second male that the CTSFOs were searching for?
 18 A. Yes.
 19 SIR JOHN SAUNDERS: You clearly got information from the
 20 CCTV control room, but I can't find it actually
 21 in the --
 22 A. It was a conversation with a DC called Paul Roberts.
 23 I was a PC with Paul, so I think by whatever means I got
 24 his phone number. He was in the CCTV room. I asked him
 25 to look at it and he fed it back to me. There was some

1 confusion, he rang me back and he said, "But we're not
 2 100%", so I was a bit... but I settled on it, it's
 3 unlikely that it's --
 4 SIR JOHN SAUNDERS: Thank you.
 5 MR GREANEY: We hadn't looked at that conversation, but it
 6 does exist, you're quite right.
 7 By that stage you had information that this was
 8 someone who, in the arena at any rate, had been alone?
 9 A. Yes.
 10 SIR JOHN SAUNDERS: Sorry, I've now found that conversation,
 11 thank you.
 12 MR GREANEY: Over the page to {INQ040657/28}. We can see
 13 that from 00.06, you were involved in a communication
 14 with Craig Thompson.
 15 A. That's correct, sir, yes.
 16 Q. Who was the Craig you'd spoken about, who was coming in
 17 effectively to take up the role of TFC?
 18 A. Correct.
 19 Q. He will be giving evidence on Monday now. I'm told by
 20 Mr de la Poer that it's a good idea, given that we have
 21 capacity today, because we'll probably finish a little
 22 early, if I play the recording of that conversation now,
 23 which will save some time on Monday. So you speak to
 24 Superintendent Thompson.
 25 Mr Lopez, we'll keep {INQ040657/28} on the screen

1 and we'll play at the same time {INQ025479A/1} from
 2 39:15 counter time to 43:00.
 3 (Audio played to the inquiry)
 4 We can see if we have the transcript back on the
 5 screen, please, {INQ040657/28}, the very bottom of that
 6 page, that you were saying you were 90% happy you'd got
 7 no threat, and you say "in the stadium", so you're
 8 talking not just about the City Room but about the arena
 9 more generally there; am I right?
 10 A. Yes.
 11 Q. And you make plain that the arena bowl is secure because
 12 there are armed officers all the way round it?
 13 A. Yes, correct.
 14 Q. Over the page, {INQ040657/29}, the top half, please.
 15 You say:
 16 "Yeah, I'll take command, I've got command and
 17 control at MEN and the immediate curtilage of the MEN
 18 including the forward command post."
 19 So this is the person who is shortly to become the
 20 tactical firearms commander that you're speaking to?
 21 A. Yes.
 22 Q. And you are indicating to him, as I've read it, the
 23 limits on your command and control, namely the MEN, as
 24 you put it --
 25 A. Yes.

1 Q. -- and the forward command post just outside?
 2 Towards the bottom of that page, at 00.10.13,
 3 you have a conversation with Dave of the SMU. What is
 4 the SMU?
 5 (Pause)
 6 SIR JOHN SAUNDERS: Is it something to do with
 7 communications?
 8 A. Is that Dave Myerscough?
 9 MR GREANEY: It might be because it is wider than
 10 communications. The chairman has spotted you are
 11 saying:
 12 "I was having real problems with the network."
 13 You then go on, however, to talk about the search
 14 and you say:
 15 "I wouldn't send any unarmed, any more unarmed
 16 resources."
 17 A. Yes.
 18 Q. What was the purpose of saying that?
 19 A. I think there was just a lot of unarmed staff at the
 20 scene.
 21 Q. Indeed you go on to say:
 22 "I've got plenty of unarmed resources down here."
 23 In the very end, very much towards the end of the
 24 recording, you were even to come to be of the view that
 25 there were too many police officers at the scene.

1 A. Yes.
 2 Q. And you say:
 3 "What I could do with is nominating an unarmed
 4 Bronze for the outer perimeter and to start -- and to
 5 start bringing and to start marshalling resources so
 6 I understand what I've got."
 7 What did you mean by that?
 8 A. I knew Mike was heavily involved in the immediate
 9 vicinity of the City Room and had been throughout
 10 probably. There were no other unarmed commanders at the
 11 scene certainly that I was aware of.
 12 SIR JOHN SAUNDERS: There was apparently another
 13 inspector --
 14 A. Yes.
 15 SIR JOHN SAUNDERS: -- who was doing the outer perimeter.
 16 MR GREANEY: Inspector Cooklynn, I think.
 17 A. This kind of exposes the difference between the armed
 18 command and the unarmed command.
 19 Q. Exactly. This is what I wanted you to comment on.
 20 A. It's not really my role and I am creeping into that
 21 role, and I accept that and I always have done. I'm not
 22 on that -- that is managed on a different Talk Group
 23 completely, so I wouldn't have been aware. If I'm
 24 honest, I don't think I became aware of the second
 25 inspector for quite some time afterwards.

1 Q. At this stage you're still in the City Room, I believe
 2 anyway, and you have a conversation with James Allen.
 3 So we'll listen to this recording. It's not terribly
 4 long. We'll have the transcript on the screen. It's
 5 {INQ040657/30}. We'll listen to the recording, which is
 6 {INQ025479A/1} from 44:35 to 45:55. Can I make plain to
 7 anyone that might be concerned that although this is
 8 a recording from the City Room, there are not disturbing
 9 background sounds.
 10 We can see Sergeant Warburton introduces James Allen
 11 as:
 12 "This is Jim, the manager."
 13 Sir, we did hear from James Allen. You may recall
 14 that Fred Warburton was someone that was known to him.
 15 SIR JOHN SAUNDERS: Thank you, I had forgotten.
 16 MR GREANEY: Known to him socially, I mean.
 17 (Audio played to the inquiry)
 18 There's just a couple of aspects of this that I want
 19 to understand. You were already aware that the arena
 20 staff, either SMG staff or ShowSec, had carried out some
 21 form of search of the arena --
 22 A. Yes.
 23 Q. -- and other areas associated with the arena. Had you
 24 or any other police officer deployed those non-police
 25 resources to carry out that task?

1 A. I certainly hadn't, but whether somebody else did,
 2 I couldn't tell you. But I'd not deployed arena staff
 3 myself, no.
 4 Q. Was it unwise in circumstances in which there might have
 5 been a secondary device that people in that situation
 6 should be carrying out that search?
 7 A. Yes.
 8 Q. But in the result, they had, by which I mean SMG and
 9 ShowSec, plainly done something that was helpful?
 10 A. Yes.
 11 Q. It gave you a degree of reassurance that you referred to
 12 in calls?
 13 A. Yes.
 14 Q. And that obviously, therefore, is to their credit?
 15 A. Yes.
 16 Q. Although it would also be fair to say that you were,
 17 it would seem, distinctly unimpressed by the enquiry
 18 about the press?
 19 A. Yes.
 20 Q. As I indicated, you stayed, I believe, in the City Room
 21 until 00.14. From page 32 of the transcript
 22 {INQ040657/32}, we can see why you leave. You were
 23 having a further conversation with Superintendent
 24 Thompson:
 25 "Have you got Fred Warburton's number?"

1 Do you see that in the middle of the page?
 2 A. Yes.
 3 Q. "Can you ring Fred and you can RV at a forward command
 4 point at the arena, please? Cheers, thanks."
 5 You then have a discussion with the OFC,
 6 PC Richardson:
 7 "Just take a door, keep line of sight. Obviously
 8 trying to clear this area with a dog."
 9 And then:
 10 "Arena on lockdown so no one comes in."
 11 So you're talking about containing the area with
 12 firearms assets and ensuring that the search continues
 13 of the arena bowl.
 14 Then you say this, which is the explanation for why
 15 you leave:
 16 "Right. Let's just go and just have a round.
 17 I just want to understand the forward command point.
 18 I want to see what's at the forward command point and in
 19 terms of armed resources and I want to see what the
 20 cordons, if any, is on."
 21 So that seems to be your driver to find out what is
 22 occurring at the forward command point.
 23 A. Yes.
 24 Q. Have I understood that correctly?
 25 A. Yes.

1 SIR JOHN SAUNDERS: Can we not leave this for a moment?
 2 This is just me not understanding and I'm no doubt
 3 missing something very simple. The 00.13.34, which is
 4 meant to be a continuing phone call with Craig Thompson:
 5 "Hi, mate. Are you okay? Have you got Fred
 6 Warburton's number? Can you ring Fred and you can RV at
 7 a forward command point?"
 8 That's not Mr Thompson, is it?
 9 A. It's not very clear that, no. I think at the point
 10 I have made a decision that the CTSFOs are better off
 11 regrouping for a potential secondary threat and
 12 essentially what I'm doing there is handing them back
 13 over as assets to Craig as the TFC as opposed to me as
 14 the ground—assigned, and I am saying he should go to a
 15 forward command point potentially or an RV point.
 16 SIR JOHN SAUNDERS: Thank you very much.
 17 A. I'm almost asking him where he wants them.
 18 MR GREANEY: Does that answer your question, sir?
 19 SIR JOHN SAUNDERS: Yes, thank you.
 20 MR GREANEY: So you want to go and see what's occurring
 21 at the forward command point. And we can see you
 22 departing in CCTV images. This is back to the sequence
 23 of events, {INQ035612/435}.
 24 That isn't a particularly informative photograph,
 25 but it gives us some narrative. You left the — you

1 have plainly left the City Room by this stage and you're
 2 having a conversation with the paramedic, Mr Poland, and
 3 he is pointing you outside on to Station Approach.
 4 Again in a moment we're going to see what's going on
 5 there.
 6 Then I hope the next page is going to be a bit more
 7 helpful. {INQ035612/436}, please. Yes.
 8 So 00.16.37:
 9 "GMP Chief Inspector Mark Dexter approaches
 10 operational commander Stephen Hynes of NWS and he's
 11 seen to have a brief conversation with him."
 12 Let's pick up what's happening. This takes us back
 13 to the transcript, Mr Lopez, {INQ040657/33}.
 14 Around a third of the way down that page we can see
 15 that interaction with Mr Poland that we couldn't see in
 16 the image. You ask:
 17 "Who is the NWS incident commander?"
 18 And he says:
 19 "He's outside."
 20 And we know from the narrative he's pointing towards
 21 Station Approach.
 22 You then go outside and you do have a conversation
 23 with Mr Hynes who by that stage has replaced — I am not
 24 using that word pejoratively — Mr Smith. We'll listen
 25 to the recording of that conversation.

1 Keep the transcript on the screen, Mr Lopez. The
 2 recording is {INQ025479A/1}, 49:10 counter time to
 3 49:40. It is very important here, Mr Lopez, that you do
 4 not start the recording any earlier than 49:10.
 5 (Audio played to the inquiry)
 6 Can we play that again, please, because it isn't —
 7 the audio wasn't very good and I don't know whether it's
 8 possible to increase the volume on that. That's
 9 a request of RTS, if they could increase it, to some
 10 extent that would be helpful.
 11 SIR JOHN SAUNDERS: But you're clearly getting in at an
 12 early stage your view of what the ground—assigned TFC
 13 does —
 14 A. Yes.
 15 SIR JOHN SAUNDERS: — when you say, "I'm, from the firearms
 16 point of view, in charge?"
 17 A. Yes.
 18 MR GREANEY: So could we play that again? 49:10 to 49:40,
 19 please, {INQ040657/33}.
 20 (Audio played to the inquiry)
 21 So this, I think, is the first discussion, insofar
 22 as the recording is concerned, that you've had with any
 23 member of any other emergency service about Plato
 24 zoning.
 25 A. Yes.

1 Q. It's well over 45 minutes after you have -- well, it's
 2 46 minutes after you've left the City Room, having
 3 formed your view about that area, warm, and no doubt
 4 also forming the same view about the overbridge before
 5 reaching that view about the concourse area itself.
 6 We'll have {INQ040657/33} on the screen again,
 7 Mr Lopez. As the chairman has said, you're very clear
 8 about the extent to which you're in charge:
 9 "I am from the firearms point of view, yes."
 10 Mr Hynes asks you:
 11 "Is it safe at present?"
 12 To which area or areas did you understand he was
 13 referring in asking is it safe?
 14 A. I think it's potentially talking about the casualty
 15 clearing area because we're stood at the threshold of
 16 it, as I recall --
 17 Q. You are.
 18 A. -- between there and the FCP and... So we're
 19 potentially looking in, as it's stating here, because
 20 his staff are clearly working in there. This is where
 21 I think I have used zoning to articulate risk as opposed
 22 to it being the literal purpose in JOPs and he's pushed
 23 me, hasn't he, on "Is it safe?"
 24 Q. Was that a reasonable and understandable thing for him
 25 to ask you?

1 A. Yes, and I think there's maybe a reason why. You may
 2 know this or you may not from the timings of the
 3 transcripts, but I think I presumed that people had --
 4 you know, before I arrived had known that Plato had been
 5 declared and then almost scaled down a bit because we
 6 knew we didn't have the marauding firearms aspect of it.
 7 Q. Just pause for a moment: had you assumed that because
 8 you knew that the FDO's responsibility was to
 9 communicate with other emergency services or for some
 10 different reason?
 11 A. That's what should happen, isn't it, so there's an
 12 expectation in the plan that things get communicated and
 13 if we declare Plato then we share information. So I was
 14 a -- I think later on, I think there's conversations
 15 about Plato and I remember being slightly perplexed as
 16 to why they were asking me about Plato because in my
 17 mind that was pretty much gone. I know we had kept --
 18 there's another debate about whether you rescind Plato
 19 and that's for later maybe. But I think he's probably
 20 been told by the tactical commander at that point from
 21 force HQ that Plato's just been declared and I think
 22 that's why he's asking why -- "Is it safe", because
 23 I couldn't understand why he was asking that question
 24 given that we'd been there for quite some time. It's
 25 maybe a question for Mr Hynes, but that's potentially an

1 explanation for that.
 2 Q. I understand what you mean. There comes a time at which
 3 NNAS Silver in the command suite becomes aware of the
 4 declaration of Plato and we'll need to check whether
 5 that is the point at which this question is being posed
 6 to you.
 7 A. It's a reason, it's an explanation and, quite
 8 understandably, he's just been told that we think
 9 there's a new threat developing.
 10 Q. You say:
 11 "I'd say warm, but you're okay anywhere in there."
 12 Fine. I'll border on cold but I'll stick with warm."
 13 What area or areas are you referring to?
 14 A. I think he was talking about the casualty clearing area
 15 because clearly he's got staff working in there and I'm
 16 basically saying: you're okay to carry on working in
 17 there, I'm warm but I am bordering on going cold, and
 18 essentially the only thing I am really trying to resolve
 19 is whether there are secondary devices left behind. I'm
 20 potentially talking about cold outside, the FCP, where
 21 there are still, if I remember rightly, still people,
 22 members of the public, victims.
 23 Q. From what you've said, you don't seem to be referring to
 24 the City Room?
 25 A. No.

1 Q. Although in fact, it was also your view that the
 2 City Room was warm?
 3 A. Yes.
 4 Q. Was, to use your phrase, the City Room by that stage
 5 bordering on cold as well?
 6 A. The whole area was because we had -- there was quite
 7 a bit of mitigation in otherwise.
 8 Q. And Mr Hynes understandably presses you:
 9 "So Mark, can you confirm that it's safe then?"
 10 You say:
 11 "Yeah."
 12 He asks:
 13 "That it's cold?"
 14 And over the page {INQ040657/34}, you say:
 15 "I'd say so, I would declare this cold for now."
 16 Would it be fair to say that that represents
 17 a rather vague or non-technical approach to zoning?
 18 A. Yes.
 19 Q. And in turn, does that reflect that what you were trying
 20 to communicate wasn't really something formal in terms
 21 of Plato but instead your view about the degree of risk
 22 to which staff would be at?
 23 A. Yes.
 24 Q. I'm going to try and conclude my questioning before we
 25 a break. Let's see how things develop in the subsequent

1 period leading up to the hour mark from your arrival.
 2 {INQ040657/38}. You have a conversation, first of,
 3 all that I want to look at with emergency planning
 4 command coordinator at force headquarters, Laura Lewis.
 5 Can you see that? You say:
 6 "Hello, I'm losing Airwaves."
 7 This is at 00.21:
 8 "I can't communicate with anyone."
 9 Do you see that?
 10 A. Yes.
 11 Q. So what is happening at that stage, please? Please
 12 don't refer to any channel numbers expressly.
 13 A. Okay. So in general terms, my handset was locking out.
 14 I now know why. If you listen to the audio, you can
 15 hear a kind of beeping noise when I'm trying to transmit
 16 on the radio. I thought that was the network being busy
 17 and not being able to get through and it is --
 18 apparently that tone means that you're in a queue. So
 19 if you hold it for longer, I didn't know this at the
 20 time, but if you hold it for longer, it will let you in.
 21 So I'm told -- I think it was Laura -- that the
 22 technical people afterwards, that actually the mast was
 23 able to cope, it was just people were transmitting so
 24 you had to wait in line.
 25 SIR JOHN SAUNDERS: Okay. Again, no criticism of you, it's

1 really very unfortunate you didn't know something which
 2 may appear reasonably basic about your radio.
 3 A. Yes. I think I was issued with that radio in 2004 and
 4 we did do training on Airwaves then and it was
 5 (overspeaking) --
 6 SIR JOHN SAUNDERS: You didn't do it?
 7 A. We did. When they were implemented, people were trained
 8 on how to use the radio and I'd probably just forgotten
 9 (overspeaking).
 10 SIR JOHN SAUNDERS: No, no, it's just one of these things.
 11 Looking back, it would be really good if you'd had some
 12 refresher training in that since 2004.
 13 A. I don't hit the streets as much nowadays as I used to,
 14 sir.
 15 SIR JOHN SAUNDERS: You may not need it now, but you needed
 16 it then.
 17 A. Yes.
 18 MR GREANEY: Your impression then, notwithstanding that you
 19 now have an understanding of what was happening, was
 20 that Airwaves had crashed?
 21 A. That's what I was thinking, yes.
 22 Q. Then although it isn't expressly referenced, you are
 23 then having, I think, what must be a separate
 24 conversation where you say:
 25 "Right, Lee."

1 Do you think that's Lee Moore or someone else or
 2 can't you say? There are a couple of Lees around.
 3 A. Yes. Um... I couldn't say who that was, sorry.
 4 Q. Let's see what you say anyway:
 5 "I want her at Selfridges. I have just spoken to
 6 the NWAS incident commander, we've got quite a few that
 7 are kind of sat, walking wounded and possibles, but it's
 8 still -- I'm still keeping this as a warm zone."
 9 What area were you talking about then?
 10 A. I would like to think I'm talking about the casualty
 11 clearing station but I may be talking more generically
 12 about the area.
 13 Q. If you're talking about the casualty clearing station
 14 you had just in your discussion with Mr Hynes said, "I'm
 15 declaring this cold", yet here you're saying it's warm.
 16 A. Yes, I'm not sure when I was talking to Steve, whether I
 17 was talking about the cold being outside and then the
 18 threshold inside being warm or, and I'm being really
 19 honest, when he has pushed me on whether it's safe, and
 20 I'm thinking if, "If I'm saying it's not safe" --
 21 SIR JOHN SAUNDERS: You want him to keep on doing the
 22 treatment he's doing at the moment --
 23 A. Yes.
 24 SIR JOHN SAUNDERS: -- and it looks like he's not going to
 25 do that unless you tell him it'd cold.

1 A. And I wonder if that's what I've done to try and take
 2 that concern away.
 3 MR GREANEY: It does rather look that way.
 4 A. Well intentioned, I confused -- intentional or well
 5 intentioned.
 6 Q. Then we can see, a little further down that page,
 7 you have a further conversation at 00.22.43 with
 8 ACC Ford. You use that phrase that I used a moment ago:
 9 "I'm struggling with the Airwaves, it's crashed."
 10 You give an update as to the number of dead and
 11 injured and say:
 12 "Now, the view I've got at the minute is I have
 13 declared -- I have kept it as a warm zone at the minute
 14 because I still don't know what we've got and I've not
 15 cleared it but I am letting them work, working on fine
 16 which is no problem. I've cleared the whole -- the
 17 whole of the arena is cleared, but what I have suggested
 18 is we move because we're still in the warm zone."
 19 So am I right to read that that in that discussion
 20 with the ACC you're talking about the City Room and
 21 arena being a warm zone?
 22 A. Yes. I think the comment about "we move" is potentially
 23 about getting people into buses and away; is that right?
 24 Q. You certainly --
 25 A. Yes.

1 Q. -- talk about buses.
 2 A. Yes.
 3 Q. We've now reached 00.23 hours, so exactly an hour after
 4 you had arrived at the scene, and as we promised
 5 earlier , we're now going to pick up some speed and
 6 I think there is only one, perhaps two, two further
 7 conversations that we need to listen to.
 8 Could we go to the transcript, please,
 9 {INQ040657/39}. At 00.24.33 you indicate you're still
 10 struggling with Airwaves, and then you say:
 11 "What's that?"
 12 And you're told:
 13 "There are reports of shots fired at Oldham A&E."
 14 I'm sure that is a moment you will never forget.
 15 Can you tell us what your thoughts and feelings were
 16 when you heard about that?
 17 A. I remember my spine going cold and almost a bit of
 18 paralysis in my back. I don't know what -- is that
 19 adrenaline or something? I don't know what causes it.
 20 But I remember thinking, "Oh my God, they're actually --
 21 it's a marauding, multi-sited and they're actually
 22 attacking where we've sent the victims".
 23 Q. So you had from the first moments that you became aware
 24 of this incident been concerned that this might be
 25 a multi-site attack?

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1 A. Yes.
 2 Q. And was this really your worst fears potentially being
 3 confirmed?
 4 A. Yes. Thankfully not, but yes.
 5 Q. As we know, this was a false report, but you didn't know
 6 that at the time?
 7 A. No.
 8 Q. And we can see that at the bottom of the page, 00.24.58,
 9 the TFC, Superintendent Thompson, has an input:
 10 "The only thing that we've got is one report from
 11 staff of shots fired and staff have barricaded
 12 themselves in at the A&E at Oldham Hospital. Obviously
 13 the threat assessment in relation to the staff, high
 14 obviously, council policy, ECHR options, armed enquiry,
 15 and get yourself another ARV to go on to this channel
 16 and just go in and negate the threat."
 17 And we perhaps see a clear indication of how you
 18 were feeling at the time as you say:
 19 "Fucking hell."
 20 You then deploy assets to Oldham, do you not?
 21 A. Yes.
 22 Q. Why were you doing that as opposed to the TFC, who by
 23 that stage was in post?
 24 A. I didn't deploy assets that we had on the ground,
 25 I think ... Pretty fortuitously , I think, the CTSFO team

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1 from the north-east somehow had got my number, mobile
 2 number, I am guessing in some of the north-west CTSFO
 3 teams and by pure coincidence their OFC rang me on my
 4 mobile and said, "Where do you want us at the arena",
 5 and I said based on what I'd heard -- and actually, if
 6 you go back in the transcript, one of the NWSA
 7 commanders had raised it with me as well, so I was
 8 getting it from two angles, which almost gave it more
 9 credibility . So I just -- because of -- without going
 10 into the location of where they're based, they would
 11 pass Oldham, so it's a natural thing to do to say, "No,
 12 don't come here, go to Oldham".
 13 Q. If we look over the page of the transcript to page 40,
 14 at the top, {INQ040657/40}, you are on the phone to
 15 someone:
 16 "Right, can you get yours to go straight to Oldham,
 17 mate, please? How far out are you? Straight to
 18 Oldham Hospital. We've got reports of shots fired by
 19 the staff."
 20 So have I understood correctly that you're the
 21 ground-assigned tactical firearms commander for the
 22 arena and its environs. Ordinarily, you would not be
 23 the person deploying armed assets to Oldham, that would
 24 be the job of the tactical firearms commander
 25 Mr Thompson?

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1 A. That's correct.
 2 Q. As it happened, the opportunity for you to make a
 3 deployment arose?
 4 A. Yes. If I recall , quite quickly I informed Mr Thompson
 5 of the resources and handed them over to him, in effect.
 6 Q. Thereafter, you were heavily concerned with the events
 7 at Oldham. We don't need to go into the details of
 8 this, but you were also involved in putting protective
 9 measures in place at other accident and emergency
 10 departments around the Greater Manchester area?
 11 A. Yes.
 12 Q. So was the thought: they're now attacking hospitals, we
 13 need to make sure that if it happens at other hospitals
 14 we have resources there?
 15 A. Yes, and I think there was another incident -- was it at
 16 North Manchester?
 17 Q. I'm sure your recollection is accurate. I can't
 18 immediately bring that to mind, I confess.
 19 At 00.37 hours, you have a further conversation with
 20 Steve Hynes of North West Ambulance Service. Could
 21 we have on the screen, please, the sequence of events,
 22 {INQ035612/468}.
 23 It is now 00.36.52. You walk over to Stephen Hynes
 24 and you're in conversation for a few minutes. We'll
 25 listen to that recording and have the transcript on the

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1 screen at the same time. The recording is
 12:27:44 2 {INQ025479A/1}, from 01:10:10, please, to 01:12:35.
 2 Again, Mr Lopez, please ensure you do not start the
 12:28:02 4 recording any earlier than 01:10:10.
 3 The page of the transcript is {INQ040657/52}, it
 4 starts at.
 5 (Audio played to the inquiry)
 6 SIR JOHN SAUNDERS: Do we need to check what's gone out on
 7 that recording?
 8 MR GREANEY: I'm sorry, sir, which page are you looking at?
 9 SIR JOHN SAUNDERS: There is something marked on my
 10 transcript as being sensitive, which was actually
 11 played, but it may be different on somebody else's.
 12 A. I don't think that is particularly sensitive, sir. It's
 13 been in the other documents.
 14 MR GREANEY: That's a good spot, sir. Could you direct me
 15 to the page of the transcript you were looking at?
 16 SIR JOHN SAUNDERS: {INQ040657/53}, the second to bottom of
 17 53. It's fine, apparently, Mr Suter is saying. I was
 18 just checking.
 19 MR GREANEY: You're quite right to check. The
 20 superintendent is correct, there have been repeated
 21 references to that in the transcripts. Very
 22 occasionally errors do creep into this.
 23 So could we go back, please, to {INQ040657/53} of

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1 the transcript. We can see you say:
 2 "This is secure now. It's been explo searched so
 3 it's cold."
 4 And you're asked by Mr Hynes:
 5 "Okay, so when you say it's cold, is that the whole
 6 site of Victoria Station?"
 7 And you say:
 8 "No, no, just where we are."
 9 So we're talking about, are you, the FCP or a more
 10 general area?
 11 A. I think we're talking about the FCP there or certainly
 12 the immediate vicinity of where we're stood.
 13 Q. You say — and this perhaps confirms what you've just
 14 said:
 15 "No, the outside is now cold. That is getting near
 16 to cold. I am just going to put some more dogs in."
 17 Where are you talking about?
 18 A. I think that's the casualty clearing station.
 19 Q. Again, I think you will agree that saying things like
 20 "getting near to cold" is not very precise language in
 21 terms of Operation Plato?
 22 A. No. But I'm trying to, I suppose, articulate the scale
 23 of where we are. So if it's warm, high end of the
 24 scale, you need to be really careful because we're close
 25 to a hot zone. If it's the bottom end of warm, to cold,

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1 you don't need to worry as much. I suppose it's
 2 a pragmatic way of trying to say where we are or what
 3 direction we're heading in.
 4 Q. Once again, it's an example of what you said to us
 5 earlier, that what you're using these terms to describe
 6 is risk?
 7 A. Yes.
 8 Q. In the 10 minutes that followed, you continued to
 9 concern yourself with the search of the arena and with
 10 the events at Oldham. You are seen giving a briefing to
 11 firearms officers and then, at 00.47 hours, you had
 12 a discussion with Mr Thompson. We'll have that on the
 13 screen. It's the bottom half of this page,
 14 {INQ040657/62}, the bottom half of the page.
 15 He's obviously asking you questions. You say:
 16 "Right. All right, let me finish. Right. I've
 17 declared at the perimeter — no, the outside, I've gone
 18 cold, a cold zone, so all right."
 19 Are you talking there about the area just outside
 20 the railway station including the FCP?
 21 A. Yes.
 22 Q. "Warm and still in. Yeah, the perimeter, the perimeter
 23 is now cold. Yeah. Until — I'm just putting the dogs
 24 through and POLSA through, just a final search inside
 25 and once I've done that then I'll go — once that's

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1 cleared I'll go cold."
 2 What area are you talking about there?
 3 A. I think that's still the casualty clearing station
 4 in that area there. So I think what I was looking for
 5 is that final kind of sign-off from the POLSA to say,
 6 "We've searched, we've put the dogs through, there's no
 7 sign of anything", before I'd actually really nail it
 8 and say, "I'm happy it's safe now", because the
 9 consequences of me saying it's safe, and then I haven't
 10 got that reassurance, are pretty terrible, aren't they?
 11 Q. This was you updating the TFC in simple terms about
 12 zoning and risk?
 13 A. Yes.
 14 Q. We're very nearly at the end of the chronology that
 15 I want to ask you about, although I know that you
 16 remained at the scene for much longer.
 17 At 00.54 hours you were approached by the Fire and
 18 Rescue Service NILO, Andy Berry. We can see the images
 19 of your encounter on the screen. This is the sequence
 20 of events at {INQ035612/529}.
 21 00.58.38. I gave a slightly inaccurate time
 22 earlier. The discussion starts at 00.54, I think.
 23 You are on the telephone and Mr Berry is nearby.
 24 {INQ035612/533}, please. You're still on the phone
 25 and in conversation with the GMFRS NILO, Andy Berry. By

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1 this stage, the Fire and Rescue Service is at the scene?
 2 A. Yes.
 3 Q. Mr Berry, the NILO, has a conversation with you?
 4 A. Yes.
 5 Q. What he really wants you to do is to speak to the chief
 6 fire officer, Peter O'Reilly?
 7 A. Yes.
 8 Q. And later in the conversation that we're going to listen
 9 to, Mr Hynes comes in. We will listen to that recording
 10 but I'm just going to check with Mr Suter, will the
 11 playing of the recording give the stenographers a short
 12 break? We'll listen to the recording. We will play
 12:38:10 13 {INQ025479A/1} from 01:30:00, and I'll tell you where to
 13 stop, Mr Lopez.
 14 The transcript reference starts at the very bottom
 15 of page 67 of {INQ040657/67}.
 16 (Audio played to the inquiry)
 17 No doubt that's my fault, but that's not the right
 12:39:34 19 starting point. Did you start it at 01:30:00?
 18 (Pause)
 12:39:49 21 Go back to 01:28:10. Go back to 01:26:30, please.
 19 I'm not quite sure how this has happened, Mr Lopez.
 20 (Audio played to the inquiry)
 21 We can see at the bottom of {INQ040657/71}, you are
 22 having a discussion with Mr Berry, and you say:

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1 "Well, it's — is it — he's on about ballistic
 2 protection. I said, if you want to wear ballistic
 3 protection, wear ballistic protection, but there is no
 4 firearms threat at the moment."
 5 Mr Berry asks:
 6 "Was he happy with that?"
 7 And you say:
 8 "Well, God knows."
 9 A few questions about that series of conversations.
 10 First of all, did you know Peter O'Reilly, the chief
 11 fire officer?
 12 A. No.
 13 Q. Did you know Andy Berry, the GMFRS NILO?
 14 A. No.
 15 Q. Go to page {INQ040657/70}, please, the bottom half of
 16 the page. During the course of the discussion you have
 17 on the telephone with Mr O'Reilly you say:
 18 "What we've got is Plato standby at
 19 Thompson Street."
 20 What did you mean by that?
 21 A. So the assets that we would use to deal with a genuine
 22 Plato, I'd started to corral and pull together at
 23 Thompson Street.
 24 Q. I think some who have looked at the evidence in this
 25 case have concluded that around this point, you have

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1 made a decision that a full Plato is no longer in
 2 operation and you've moved to something known as Plato
 3 standby. Have people correctly understood what you were
 4 talking about?
 5 A. I think that there is — firstly, in the guidance
 6 there's no such thing as Plato standby. So it's
 7 something I've said, I think, to reassure NWAS, in
 8 particular, for reasons that potentially is the
 9 communication from the commander in the control room,
 10 that we're not actively dealing with a Plato, but
 11 obviously we have declared Plato. So I suppose in
 12 NWAS's mind: why declare if it's not?
 13 So in my — and this is where I think the difference
 14 between police doctrine, Plato and JOPs becomes clear.
 15 We declare Plato to build our capability and capacity
 16 and it activates JOPs as a methodology for dealing with
 17 casualties that are under threat.
 18 My view, and I'll be corrected if I'm wrong, is
 19 it would be almost reckless to rescind because if you
 20 look at what the effect of — in policing terms, the
 21 effect of declaring Plato is, it's capacity and
 22 capability building, it is to bring specialist assets in
 23 or volume of assets to deal with something that we just
 24 couldn't cope with through business as usual
 25 arrangements.

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1 If the effect is to activate and build that and to
 2 mobilise, the effect of rescinding is to turn them all
 3 away and we're not comfortable enough around potential
 4 further threats at that point to say we can rescind
 5 Plato. So in my mind, I'm saying you can't rescind
 6 Plato because in effect you turn your resources away.
 7 And based on what we thought through JTAC briefings, and
 8 we even went to critical the following day, didn't we,
 9 because of the risk of more attacks, I think it would
 10 have been reckless to rescind it, so in effect I found
 11 a middle ground and said, "Yes, I have declared it", but
 12 for the purposes of building capability just in case
 13 something else happens.
 14 SIR JOHN SAUNDERS: But it's zoning that actually matters,
 15 isn't it?
 16 A. Exactly, that's the point. You can declare Plato but
 17 you manage the deployments through zoning.
 18 MR GREANEY: Exactly what I was going to ask, sir, so
 19 thank you very much indeed.
 20 SIR JOHN SAUNDERS: I'm sorry, I keep asking the question
 21 that's about to be asked.
 22 MR GREANEY: I am sure you are asking them in a better way
 23 than I could, sir.
 24 SIR JOHN SAUNDERS: You don't mean that either!
 25 MR GREANEY: The other aspect of this that I just wanted to

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1 be clear about was this — and as I said, I have
 2 listened well on into the recording, and you do comment
 3 about this discussion with Mr O'Reilly on a couple of
 4 occasions, actually. But even listening to what we've
 5 just listened to, have I correctly understood what was
 6 happening? This is 2 hours and 25 minutes after the
 7 explosion has happened.
 8 A. Yes.
 9 Q. There have been officers, paramedics, members of the
 10 public, ShowSec, both armed and unarmed officers, BTP
 11 unarmed officers, in the City Room and in the station
 12 for hours.
 13 A. Yes.
 14 Q. More than 2 hours. And here, 2 hours and 25 minutes on,
 15 is Mr O'Reilly asking you about his staff going into the
 16 station, wearing ballistic protection or about something
 17 different?
 18 A. No, that's correct.
 19 Q. And the impression one gains is that you didn't think
 20 very much of what he was asking you.
 21 A. I was frustrated with the conversation. I think in
 22 fairness to Mr O'Reilly, there's potentially reasons why
 23 he didn't know what the risk was, but I was very
 24 frustrated at the time. I couldn't understand why
 25 he was asking questions like that at that point.

1 SIR JOHN SAUNDERS: You're very good at making explanations
 2 for others, but just tell us how it was for you at the
 3 time. They can give their own explanations.
 4 A. If I said I was nervous when I was going to listen back
 5 to the audio about what I'd said to him, (inaudible)
 6 said the same thing. I do caveat that with, actually,
 7 when you think about — it's perfectly reasonable
 8 questions what he's asking; why it's taking so long is
 9 another matter.
 10 SIR JOHN SAUNDERS: He is looking to the safety of his own
 11 officers who he doesn't want to send into a dangerous
 12 situation.
 13 A. Yes.
 14 MR GREANEY: But on the other hand, it's nearly 2.5 hours
 15 after the explosion and you know what the situation
 16 there was in terms of security.
 17 A. Yes. But he didn't.
 18 Q. The transcript, our transcript, ends there, but you were
 19 to remain at the scene for a considerable period longer,
 20 were you not?
 21 A. Yes.
 22 Q. In fact, you don't leave until about 3.30 in the
 23 morning?
 24 A. That's correct, yes.
 25 Q. And when you departed, where did you go to?

1 A. I went back to the command module.
 2 Q. I just want finally, so far as my questions are
 3 concerned, to invite you to confirm a series of things.
 4 When you left at 3.30, you had updated the Fire and
 5 Rescue Service and the Ambulance Service and handed over
 6 the scene security to the unarmed Bronze commander,
 7 supported by an OFC?
 8 A. That's correct, yes.
 9 Q. You had dealt with zoning, had you, and by that stage
 10 changed all zones from warm to cold?
 11 A. Yes.
 12 Q. Having done all that you felt you practicably could to
 13 search the area?
 14 A. Yes.
 15 Q. Had you spoken to the senior investigating officer,
 16 Detective Superintendent Denise Worth?
 17 A. Yes.
 18 Q. And did you undertake a whole series of additional
 19 tasks, including, I'm not going to ask you for the
 20 detail of this, but assisting with the identification of
 21 the murderer?
 22 A. Yes.
 23 MR GREANEY: Thank you very much indeed, superintendent.
 24 Those are my questions. I know others do have questions
 25 for you, but I understand from emails that were kindly

1 sent to me that that questioning should not take much
 2 more than an hour or an hour and 15 minutes. Bearing in
 3 mind I know people will have made travel arrangements
 4 for this afternoon, I don't know whether it's possible
 5 to take a much shorter than our normal break.
 6 SIR JOHN SAUNDERS: I found today quite gruelling. Nothing
 7 like as gruelling as the families would have found it.
 8 I had always intended we would finish early today and
 9 I'd hoped by 3 o'clock, which still sounds reasonable
 10 if we take a slightly shorter lunch.
 11 MR GREANEY: I was going to propose, although this may not
 12 be possible, 30 minutes. I'm going to check. I can see
 13 that Mr Atkinson is concerned by that.
 14 MR ATKINSON: If those families are planning to go to
 15 Spinningfields to get there and back in 30 minutes, they
 16 won't have time to do anything when they get there.
 17 MR GREANEY: What do you suggest, Mr Atkinson?
 18 MR ATKINSON: 45 minutes? I'm getting encouraging nods to
 19 that.
 20 SIR JOHN SAUNDERS: Shall we say 1.40 back again?
 21 MR ATKINSON: Thank you, sir.
 22 MR GREANEY: I know I have taken a lot of time over this.
 23 SIR JOHN SAUNDERS: No, no, obviously the questions need to
 24 be asked, but if everyone will bear in mind, for
 25 everyone's benefit, if we could finish by 3 o'clock,

1 that would be welcomed and I'm sure it would be welcome
 2 to the families as well. Thank you.
 3 (12.55 pm)
 4 (The lunch adjournment)
 5 (1.40 pm)
 6 MR GREANEY: Sir, first of all, Mr Horwell.
 7 Questions from MR HORWELL
 8 MR HORWELL: Mr Dexter, some points of clarification first,
 9 please, if I may.
 10 You accept that the GATFC and the police on-scene
 11 commander are one and the same?
 12 A. Yes, I do.
 13 Q. It is clear under JOPs 3 that the police on-scene
 14 commander has a wider role than that of an on-scene TFC?
 15 A. I disagree on that.
 16 Q. Well, Mr Dexter, I'm not going to take time because we
 17 have the documents and arguments can later be put
 18 together based on the documents. But if I can just take
 19 a moment or two in relation to the answer that you have
 20 just given.
 21 We've looked at it many times before, but perhaps
 22 it is worth looking at it once again, {INQ008372/5}.
 23 This is the glossary definition of "on-scene commander".
 24 At the top of the page. Thank you.
 25 SIR JOHN SAUNDERS: Tell us which document this is.

1 MR HORWELL: This is JOPs 3.
 2 SIR JOHN SAUNDERS: Thank you.
 3 MR HORWELL: The definition of an on-scene commander is:
 4 "An appropriate police, FRS or ambulance commander
 5 at the scene who is responsible for undertaking an
 6 ongoing joint assessment of risk and for decision-making
 7 on the deployment of their organisation's assets at that
 8 location. On-scene commanders will therefore ensure the
 9 emergency services' response is effectively coordinated
 10 at scene."
 11 That role is plainly wider than the role of an
 12 on-scene TFC?
 13 A. It's the role of the on-scene commander, which is taken
 14 over by a TFC, a ground-assigned TFC, and that is
 15 written in the context of deliver the strategy to
 16 mitigate the risk that Plato presents. The JOPs and
 17 Plato are specific to an MTFA, accepting that the
 18 situation wasn't, so it's written in that context.
 19 I can see -- I do get this point, I can see if you
 20 look at it in layman's terms it seems to suggest the
 21 wider command responsibility because if you take
 22 literally "on scene", people will think on scene. But
 23 this document is written prescriptively for the Plato
 24 element of the wider response. And I think sometimes
 25 it's been described as: did they have command of armed

1 assets and unarmed assets? Actually, it is not as clear
 2 as that, like you say. So I could take command of
 3 unarmed assets in pursuance of the strategy that I have
 4 to mitigate the risk created by the Plato incident.
 5 What I don't do is go beyond, really, the objective
 6 which is to make the area safe, return from a hot to
 7 warm or warm to cold, and then draw in other resources
 8 to deal with the wider consequences of the incident.
 9 And I think -- and I kind of... I can see why you
 10 would see it that way because it's not as clear as it
 11 might be. But when you look at the rest of the
 12 document, there's a clear relationship between the
 13 on-scene commander and the TCG and I think at
 14 paragraph 4.5, I think it is, it talks about when the
 15 on-scene commander has satisfied himself that the threat
 16 has been mitigated, they communicate that to the other
 17 operational commanders, Plato commanders, which that
 18 refers to, or the on-scene commanders, and then speaks
 19 to the TCG commanders to bring in non-specialist and
 20 specialist assets to deal with the casualty management.
 21 So that's the context, I think, and I think
 22 I referred to it yesterday, if you look at the on-scene
 23 commander with 3 there, there is a footnote, which
 24 describes that the commanders are operational commanders
 25 and then it makes reference to the -- so it's a fire and

1 ambulance, the equivalent -- it is the equivalent of an
 2 operational commander, not a tactical commander.
 3 However, given the specific nature of police
 4 command, that being we already have an OFC at the scene,
 5 they've called it the on-scene commander to avoid
 6 complication or confusion between those two roles.
 7 That's why I have the difference of -- well, because
 8 it's quite clear it's an operational role as opposed to
 9 an on-scene tactical.
 10 Q. Well, it's an operational role for fire and ambulance as
 11 footnote 3 specifies. But Mr Dexter, no disrespect to
 12 you, I promise you, I said that time is limited, but
 13 GATFC is the police on-scene commander?
 14 A. I agree with that, yes.
 15 Q. This glossary sets out the role of an on-scene
 16 commander?
 17 A. Yes.
 18 Q. You don't agree that that definition of that role
 19 applied to you on the night, for all of the reasons that
 20 you have given us?
 21 A. So to resolve the incident, I think it says it in the
 22 text further on, the role of the on-scene commander is
 23 to resolve the incident. That means what's causing the
 24 threat. And actually, if you go back as far as
 25 edition 1 of JOPs in the scope, or just prior to the

1 scope, it makes it clear it should not be read as
 2 a major incident plan, the major incident plan is
 3 separate, and it says something very similar in the
 4 foreword of JOPs 3 as well so. It makes a clear
 5 distinction between: this should not replace the
 6 incumbent emergency plans, ie the major incident plans.
 7 SIR JOHN SAUNDERS: Resolving the incident, to you, does
 8 that mean --
 9 A. Threat.
 10 SIR JOHN SAUNDERS: -- (1) removing the threat or (b)
 11 removing the threat and dealing with any of the
 12 consequences that the threat has caused, such as getting
 13 out the injured?
 14 A. To a point. So the Plato and the JOPs is written to get
 15 the injured out of the hot/warm zones to a place where
 16 the major incident plan can take over.
 17 SIR JOHN SAUNDERS: That may involve you controlling unarmed
 18 assets, might it?
 19 A. Yes, and that's why I say this armed and unarmed is not
 20 as simple as that. So I may use unarmed staff, as I did
 21 on the night of this, the search staff, for example, the
 22 dog, in pursuance of that strategy. So if I'm trying to
 23 minimise risk to members of the public in the casualty
 24 clearing station, and the risk is presented from an IED,
 25 then I'll clearly then bring in resources under my

1 command, specialist search dogs, to mitigate that risk.
 2 I think you saw it one of the previous sides, I'm
 3 working to a firearms strategy that's set by the TFC and
 4 ratified by the SFC.
 5 SIR JOHN SAUNDERS: But it includes getting the injured out?
 6 A. Yes, absolutely.
 7 SIR JOHN SAUNDERS: And to do that you need to liaise with
 8 fire and ambulance?
 9 A. Yes.
 10 SIR JOHN SAUNDERS: It may be that -- we'll have to look at
 11 it in detail, but maybe the differences are not quite so
 12 great or stark as they initially appear?
 13 A. JOPs is very specific around the command team that deal
 14 with the Plato is three people, isn't it? It's police,
 15 fire and ambulance and they're special trained in Plato,
 16 specially equipped. That's why the fire NILOs do that
 17 role.
 18 Outside of that, there's a wider group of people
 19 that manage the tactical response. It does need making
 20 clear, sir, I completely agree --
 21 SIR JOHN SAUNDERS: I am sure it needs making clear, but --
 22 A. -- but I'm working to a firearms strategy. The
 23 Silver commander or the Gold commander managing the
 24 major incident response, the consequence management,
 25 have set a separate strategy. I can't work to two

1 strategies.
 2 SIR JOHN SAUNDERS: No, okay. I think we do need it
 3 resolved as has been said.
 4 MR HORWELL: We are all agreed.
 5 SIR JOHN SAUNDERS: When you said it might appear that way
 6 to a layman, actually it appears that way to some police
 7 officers too and some fairly senior police officers.
 8 A. Yes.
 9 SIR JOHN SAUNDERS: And it is not the only thing, actually,
 10 that your evidence has indicated needs resolving.
 11 MR HORWELL: I want to look at this from a different
 12 direction, Mr Dexter. That night you knew that Silver
 13 was at force headquarters, didn't you?
 14 A. I did, I think, towards -- I wasn't aware who duty
 15 Silver was until I got the phone call, but ultimately
 16 yes.
 17 Q. You spoke to Mr Nawaz quite early on?
 18 A. I did.
 19 Q. Quite early on you knew that Mr Hill was to be the Night
 20 Silver?
 21 A. That's correct, sir, yes.
 22 Q. And you had no basis for believing that either Nawaz or
 23 Hill were anywhere other than force headquarters, did
 24 you?
 25 A. At that time, no.

1 Q. And you had no basis for believing that there was a TCG
 2 being held?
 3 A. No, but I would assume there would be.
 4 Q. You were never told one was being held?
 5 A. No.
 6 Q. I'm going to come to look at some of what you said that
 7 night, but at no stage did you ask for an unarmed Silver
 8 commander to come to the scene to take on this wider
 9 role that we have discussed?
 10 A. No, you're absolutely right. I think when I spoke to
 11 Mr Nawaz quite early on I asked him if he'd nominated a
 12 Bronze --
 13 Q. That's right.
 14 A. -- (overspeaking) and, if you remember, I spoke to
 15 Mr Hill and there was a conversation about going back to
 16 the FCP and I made it clear to him then that's not a job
 17 of the firearms commander, in effect. The terminology
 18 I've used is Bronze, isn't it? It should have been --
 19 it should be tactical commander. I think there is
 20 actually confusion in the roles. So if you look in the
 21 major incident plan it talks about the tactical
 22 commander, incident commander on scene. If you look
 23 there's a sheet, there's a flow chart, where it refers
 24 to the Bronze on scene with all the functional Bronzes
 25 or geographic Bronzes sat underneath it.

1 And I think over time, when I've looked at that
 2 document, it has landed in my head at Bronze and that is
 3 why I have used the Bronze terminology. But regardless
 4 of the words, it's somebody at the scene managing the
 5 major incident FCP in my head.
 6 Q. You knew that there were two, at least, Bronzes at the
 7 scene, Mr Smith in the City Room --
 8 A. Yes.
 9 Q. -- and you did know about Mr Cooklynn at the time,
 10 didn't you?
 11 A. I think later on, yes, I think towards the end --
 12 further on during the incident, yes.
 13 Q. And as we now know, he was the cordon Bronze.
 14 A. Yes, apparently so, yes.
 15 Q. And you knew that he was there for a Bronze role at
 16 least, didn't you, as an inspector?
 17 A. Not necessarily, no. No, I don't know what he was
 18 there -- I think there were other inspectors there
 19 (inaudible) weren't there? I didn't know that
 20 specifically.
 21 Q. It's part of your responsibility to agree a command
 22 protocol with the FDO, isn't it?
 23 A. Yes.
 24 Q. That's clearly set out in JOPs?
 25 A. Yes.

1 Q. And you could have asked for a Silver, an unarmed Silver
 2 to come to the scene?
 3 A. Yes.
 4 Q. And you never did, did you?
 5 A. No. Well... I'd highlighted a gap of that overarching
 6 role at the scene and I think you can -- you interpret
 7 that differently. The reality -- and I have reflected
 8 on this, sir, afterwards because it's one of the first
 9 debrief points I raised. Could I have been as clear
 10 about that at the time? And I definitely wasn't as
 11 clear as I could have been. I think I was expressing
 12 frustration that there was something missing, but the
 13 reality of it was that I'd already morphed into doing
 14 that role anyway. And Mr Nawaz had clearly made
 15 a decision to be at Silver, as we know why now.
 16 I wasn't particularly in a position to start arguing
 17 about who should go where. It's a matter for Gold.
 18 Q. Mr Dexter, you very frankly accepted yesterday, and
 19 these were your words:
 20 "I completely accept on the night that I did take on
 21 and do additional roles beyond that of ground-assigned
 22 tactical firearms commander or the on-scene commander as
 23 it's described in JOPs. So I completely accept that
 24 point."
 25 A. Yes.

1 Q. And that is what happened, isn't it? You took on the
 2 role of the overall on-scene commander?
 3 A. I took -- I adopted the role of the Plato on-scene
 4 commander and took on additional responsibilities that
 5 should have been taken up by a tactical commander at the
 6 scene regardless of who that should have been. And the
 7 reason I raised this, Mr Horwell, sir, is that it was
 8 broadly manageable on the night. OS
 9 OS OS OS
 10 So I accept the
 11 point, and in fairness to you, on the night by the time
 12 I arrived it didn't make a massive difference to me, but
 13 it could in the future and that's what's really
 14 important, I think, to learn.
 15 SIR JOHN SAUNDERS: Don't worry about being fair to
 16 Mr Horwell.
 17 MR HORWELL: No one ever has been, sir, I don't expect it.
 18 Let's not forget the words of Debbie Ford: you did
 19 a good job.
 20 A. Yes, I accept that. But --
 21 SIR JOHN SAUNDERS: I think we agree. He did the job of an
 22 on-scene commander, he did it well, Debbie Ford said,
 23 but he says it shouldn't have been his job and, had it
 24 developed in a different way, it could have caused
 25 problems.

1 A. Yes, that's really my motivation.
 2 MR HORWELL: I fully understand and accept, I won't ask for
 3 the page to come up, we are all aware of it,
 4 {INQ040657/33} of the dictaphone transcript. We all
 5 understand that Mr Hynes asked you, "Are you in charge",
 6 and you said, "I am from a firearms point of view".
 7 But we can look at other aspects of the transcript,
 8 where it is clear that you have taken command of armed
 9 and unarmed police officers.
 10 A. Yes.
 11 Q. One final point, please, Mr Dexter. You refer to this
 12 both in one of your witness statements and we can find
 13 the reference in the transcript. It's at
 14 {INQ040657/55}, but again unless you wish to see it --
 15 A. No, that's fine.
 16 Q. You are speaking to Mr Hynes, the NWSA Bronze, and
 17 Mr Hynes asks you if there's anything that you want, and
 18 you say to him:
 19 "Are you monitoring an emergency services channel
 20 for back at GMPHQ?"
 21 And he said no. And then you said:
 22 "Can we get you -- need to get you on the joint
 23 emergency services channel with them. As soon as I can,
 24 I'll come back and do it."
 25 You were referring to the existence of an Airwaves

1 channel that was available for use between the emergency
 2 services?
 3 A. Yes, sir.
 4 Q. And you were familiar with that?
 5 A. Yes. Well, I was familiar with it — is it referenced
 6 in the Plato plan or JOPs?
 7 Q. Yes?
 8 A. I didn't have two radios so I couldn't use it, but my
 9 understanding of the use of that radio was for control
 10 rooms to connect as opposed to ground commanders to
 11 connect.
 12 Q. And that is precisely what is said in JOPs and you were
 13 aware of the existence of such a channel?
 14 A. Yes.
 15 MR HORWELL: That's all I ask, thank you.
 16 MR GREANEY: Thank you, Mr Horwell.
 17 Sir, Mr Butt had indicated that he might have
 18 a limited number of questions, so I'll give him a short
 19 opportunity to indicate if he still does. There he is.
 20 Questions from MR BUTT
 21 MR BUTT: Thank you, briefly.
 22 Mr Dexter, can I briefly explore a point raised by
 23 the chairman and see if in fact there is broad agreement
 24 here. As the TFC, you would have a working strategy
 25 which would obviously involve the preservation of life,

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1 wouldn't you?
 2 A. Yes.
 3 Q. And that would drive everything that you did on the
 4 night, wouldn't it?
 5 A. It would, sir, yes.
 6 Q. To achieve that, obviously one of the things you must do
 7 is identify, locate and confront the threat, any active
 8 terrorist; yes?
 9 A. Yes, sir.
 10 Q. But in order to fully achieve that working strategy, you
 11 would need to make decisions in relation to all
 12 forward-facing police assets that were involved in
 13 threat mitigation, wouldn't you?
 14 A. Yes, the forward-facing is a good way of describing it.
 15 Q. You said that maybe black and white armed/unarmed is not
 16 a helpful distinction. Might it be better to look at
 17 what assets were being deployed and what they were doing
 18 in order to see if they fell within your sphere of
 19 command?
 20 A. Yes.
 21 Q. So to achieve the working strategy of protecting life,
 22 you would make decisions in relation to deployment of
 23 police assets involved in threat mitigation and
 24 life-saving activity, wouldn't you?
 25 A. Yes, sir.

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1 Q. And that would apply if they were armed or unarmed; yes?
 2 A. Yes.
 3 Q. Can we just briefly look at one document?
 4 {INQ007211/17}. This is the NPCC guidance to police
 5 forces.
 6 If we look at paragraph 7.2, please, it says:
 7 "In particular, forces should review their
 8 Operation Plato plans in relation to their ability to
 9 deploy a TFC or TFCs to undertake the role of on-scene
 10 commander or ground-assigned TFC in a timely manner."
 11 Does that accord with your understanding of the
 12 guidance that the National Police Chiefs' Council gave
 13 to local forces?
 14 A. It does, sir, yes.
 15 Q. So that could include, for example, plans or actions on
 16 the night to deploy other commanders to deal with issues
 17 such as RVPs, outer cordons, survivor reception centres,
 18 et cetera?
 19 A. Yes.
 20 Q. And all of that would assist the ground-assigned
 21 tactical firearms commander to make decisions
 22 in relation to forward-facing assets to engage in
 23 life-saving activity and threat mitigation?
 24 A. Yes.
 25 MR BUTT: Thank you very much. Those are my questions.

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1 MR GREANEY: Thank you.
 2 Mr Warnock was yesterday in a similar position. He
 3 thought he might have some questions, but would be able
 4 to confirm today.
 5 Questions from MR WARNOCK
 6 MR WARNOCK: I do have some short questions, thank you very
 7 much.
 8 Superintendent, could I take you back, first of all,
 9 to the conversation you had with ACC Ford with the
 10 reference to fire. Mr Lopez, it's {INQ040657/11}.
 11 That's the dictaphone transcript.
 12 It's towards the top of the page. Having said
 13 that ...
 14 (Pause)
 15 Thank you:
 16 "We have got no fire — you may as well — we may as
 17 well but NWS appear to be coping."
 18 And you have told us, superintendent, that the
 19 reference to fire was a reference to GMFRS?
 20 A. Yes.
 21 Q. And you infer from what is said there that ACC Ford had
 22 suggested she would do something about it?
 23 A. Yes.
 24 Q. I take it you infer that from the fact that you say:
 25 "You may as well — we may as well, but NWS

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1 appearing to coping"; is that right?
 2 A. Yes.
 3 Q. By the use of those words:
 4 "You may as well -- we may as well, but NAWAS appear
 5 to be coping."
 6 Were you suggesting that you did not, at that stage
 7 anyway, see a pressing need for the attendance of fire?
 8 A. Yes, that was certainly my view, I think, by that point.
 9 Bearing in mind I hadn't been there in the earlier
 10 stages, the criticality of fire being there was
 11 reducing, yes, or had reduced.
 12 Q. Thank you. Could I next ask you about the terms you
 13 used on the night, "Plato standby" and "warm going
 14 cold". I have particularly in mind the conversations
 15 you had with Mr Berry and Mr O'Reilly.
 16 "Plato standby", "warm going cold", I think you'll
 17 agree these aren't terms that appear in the JOPs, are
 18 they?
 19 A. No, they're not, no.
 20 Q. Were they terms, either of them, that you had ever used
 21 before in any training or exercise?
 22 A. No.
 23 Q. So were they terms that you came up with on the night?
 24 A. Yes.
 25 Q. I take it you would agree, therefore, that they would

1 not be terms which commanders from other agencies would
 2 be familiar with?
 3 A. I think it's fairly plain English speech, really.
 4 I still use the warm and the cold, but give an
 5 indication of the direction of travel of risk on that
 6 point.
 7 Plato being on standby, I would say, can be fairly
 8 easily understood as meaning there's not an active
 9 threat but we are putting resources on standby just in
 10 case.
 11 Q. But if other agencies have been told in fact, as they
 12 had been by this point, that Plato had been declared,
 13 it would be reasonable for them, would it not, to be
 14 working in accordance with the JOPs policy?
 15 A. Yes. But they hadn't deployed, had they? And I think
 16 that was -- the conversation was around -- I think when
 17 Mr Berry arrived at the scene he was anticipating
 18 potentially deploying and ultimately it's that
 19 conversation that's led to them probably understanding
 20 that there's no requirement to deploy into a hot or warm
 21 zone. I can see what you're saying.
 22 Q. The "warm going cold" effectively means it's still warm,
 23 doesn't it?
 24 A. It does.
 25 Q. I'm not suggesting that your use of those terms, "Plato

1 standby" and "warm going cold", was anything other than
 2 well intentioned, but do you accept that it had the
 3 potential to be confusing to those working from policies
 4 which don't have such terminology?
 5 A. I find it hard to think that the "warm going cold" would
 6 be confusing. I think most people would realise what
 7 I meant by that. The term "Plato standby" could have
 8 prompted a further question to, "What do you mean", if
 9 they didn't understand.
 10 Q. What do you think "warm going cold" meant?
 11 A. It was at the bottom end of the risk scale of warm.
 12 Warm is somewhere where a terrorist has passed through
 13 but can't be guaranteed to be safe. I was working
 14 towards a position of virtually guaranteeing the safety
 15 of that area and, rather than being at the top end of
 16 that risk, I was at the bottom end of that risk.
 17 Q. Is it a failing in your view in the policy as it was
 18 at the time, and I'm talking about JOPs edition 3, that
 19 it didn't have different gradings of warm?
 20 A. No, I don't think so. It's my human kind of
 21 articulation of where I think the risk is going.
 22 We have to have kind of signposts, I suppose, to say
 23 what areas are. The JOPs guidance does give some
 24 flexibility around -- commanders can come together and
 25 agree that actually it's not as dangerous as we think

1 but it is technically warm but we would take the risk of
 2 putting in unarmed or protected responders. So I think
 3 it gives you that flexibility.
 4 The issue I've created is by trying to give a little
 5 bit more than just warm, this "warm going cold" has
 6 given some focus on -- was it confusing? And if
 7 Mr Berry thought that was confusing, then fair enough,
 8 but I thought it was fairly clear what I meant and he
 9 clearly had the opportunity to speak to me and clarify
 10 it if he needed to. I don't think that's a JOPs issue.
 11 Q. I think Mr Hynes also pressed you to clarify whether the
 12 zones were warm or hot, did he not?
 13 A. He did and I think we covered that earlier, so -- and
 14 I explained it as I couldn't drop it from warm to cold
 15 because I was still concerned about potential secondary
 16 devices, but clearly the casualty clearing station was
 17 within that zone. Mr Hynes, I think, we may find out or
 18 may not, that he'd only just found out that Plato had
 19 been declared so I think that was why -- I'm guessing
 20 from the tone of the conversation that that was why
 21 he was pressing me on the risk and I've used again the
 22 warm status to articulate the risk. But I think it was
 23 clear at that point that there was no ongoing active
 24 firearms attack, so --
 25 SIR JOHN SAUNDERS: So you think it's a warm zone --

1 A. Yes.
 2 SIR JOHN SAUNDERS: -- but it's safe for people to work in?
 3 A. Safe enough, as Mr Smith says.
 4 SIR JOHN SAUNDERS: At that time there's no particular JOPs
 5 categorisation which meets your view at the time?
 6 A. No, and that's changed now, in fairness, sir. The newer
 7 policies are much more flexible in that sense, which
 8 came directly as a result of Manchester.
 9 MR WARNOCK: Might in fact another solution have been to say
 10 that the arena was -- certainly Victoria Station -- was
 11 by that time actually a cold zone?
 12 A. It depends on your -- that's a very subjective thing to
 13 assess, isn't it? Knowing what we now know, yes. My
 14 mindset on the night and from what I'd heard on the
 15 radio and some of the information that was coming in,
 16 I think it might have been a little bit, reckless is
 17 maybe the wrong word, but to declare too early could
 18 have caused problems.
 19 Q. Can I just pick up on something else you said, you said
 20 about how commanders under JOPs could agree to deploy
 21 into a warm zone. In fact, under JOPs, that's something
 22 that unarmed police officers can do, is it not, not the
 23 other agencies?
 24 A. Strictly speaking, in the policy, yes, but I think
 25 there's caveats in there, as there are with many

1 policies, that it's down to the individual commanders to
 2 make a risk-based decision. Again, that has changed.
 3 My view, I think when I -- I attended the working
 4 group for the rewrite of JOPs and the view I put across
 5 was it's a difficult decision for a commander when it is
 6 quite arbitrary. And to rely on sub-notes of policies
 7 as justification for going against is a bit risky for
 8 a commander and that's why we changed the main body of
 9 the policy to reflect it rather than relying on
 10 a caveat.
 11 MR WARNOCK: Thank you very much, superintendent, those are
 12 all the questions I had for you.
 13 MR GREANEY: Ms Roberts on behalf of NWSA, please.
 14 Questions from MS ROBERTS
 15 MS ROBERTS: Mr Dexter, can you see me and hear me?
 16 A. I can, thank you.
 17 Q. Thank you very much. I have four short topics that
 18 I would like to cover with you, please. They are as
 19 follows: the FCP, the CCS, the NWSA response such as you
 20 saw it to be, and the conversations that you had with
 21 Steve Hynes. We'll deal with each of those in turn.
 22 Mr Lopez, I'm going to ask you to refer to, and
 23 I don't think we need this on the screen, but it might
 24 help you, Mr Dexter, if you were to refer to your
 25 statement. It's the statement dated 17 December 2019,

1 for those who wish to follow it, that is {INQ029140/1}.
 2 I'm going to ask you, please, Mr Dexter, to look at
 3 {INQ029140/13} of your statement and in particular, just
 4 while we find that, at paragraph 37, and in due course
 5 paragraph 39.
 6 Beginning at paragraph 37, Mr Dexter, it's the
 7 paragraph that begins, "When I arrived". Do you have
 8 that?
 9 A. Yes.
 10 Q. About three lines down you say this:
 11 "I arrived at the arena at 23.23, so just over
 12 50 minutes from the time of the explosion. It was clear
 13 when I arrived that there was already a significant
 14 police and medical response in place and that people
 15 were working on casualties."
 16 Mr Dexter, by that do you mean people working on
 17 casualties within that particular zone, that particular
 18 area, just inside the station concourse?
 19 A. As I recall, I do remember paramedics working, I think
 20 some just outside and then some just in, by the war
 21 memorial, yes.
 22 Q. So outside the entrance, that's the sliding doors, and
 23 within the war memorial entrance itself?
 24 A. As I recall, yes.
 25 Q. The next paragraph that I want to draw your attention

1 to, please, is paragraph 39 and it's when you talk about
 2 the FCP. As I read this paragraph, Mr Dexter, and
 3 please tell me if I'm wrong, you are saying that you
 4 realised that there was an FCP, or what you took to be
 5 an FCP, very shortly after you arrived on scene, so
 6 shortly after 23.23. Is that right?
 7 A. I certainly had the understanding that that was where
 8 I believed the FCP to be or would be, yes.
 9 Q. Right. Where you understood that it would be, why
 10 do you say where it would be? Because you thought
 11 it would be a good place to have an FCP?
 12 A. Certainly for a spontaneous incident like this, it was
 13 close enough to what was going on but not too close to
 14 the actual site of the explosion. JOPs is quite clear
 15 that it's on the border of the warm and cold zone,
 16 technically speaking, I maybe breached that a bit. But
 17 I thought it was appropriate, yes, and I've said in
 18 Mr Greaney's questions that I do wonder if the presence
 19 of one of your staff with the tabards on is what
 20 signposted it to me.
 21 Q. I think you might be absolutely right about that, and
 22 I was going to ask you about that. The tabards, it's
 23 a chequered tabard, isn't it?
 24 A. Yes.
 25 Q. And that indicated to you and to others who is in

1 operational command; correct?

2 A. Yes. My understanding is there's one for an operational

3 commander and there's also -- is it a tactical commander

4 or an incident commander tabard?

5 Q. Yes. I'm asking about the operational commander. At

6 that stage, shortly after 23.23, that was Dan Smith.

7 He was the operational Bronze commander at that stage.

8 So he was plainly wearing that tabard, which drew your

9 attention to him, which presupposes that you formed the

10 view that he was a commander and he was at the FCP, so

11 at the forward command or control point; is that right?

12 A. Yes.

13 Q. Thank you. Going back to paragraph 39, please, within

14 your statement, you talk in line 2 about the CCS and you

15 plainly, if I may say so, Mr Dexter, had a good

16 understanding of what a CCS was, because you describe it

17 thus:

18 "The location managed by the Ambulance Service where

19 casualties are brought, triaged, and given emergency

20 treatment before being removed to hospital."

21 That's precisely in fact what you saw taking place

22 within that area; is that right?

23 A. It is, yes.

24 Q. Okay. You say this:

25 "By the time I arrived there, as I recall, quite

1 a lot of injured casualties had been moved to the CCS."

2 We know you arrived at 23.23. Assuming that this,

3 and your journey into the station, and into this

4 particular area, took place within moments, this would

5 place your time in that particular area at about 11.25

6 or thereabouts. Do you think that's about right?

7 A. Yes.

8 Q. We know, Mr Dexter, that at about 11.25, there were

9 21 casualties within that area being attended to.

10 A. That sounds realistic, yes.

11 Q. Thank you. Just further on within that paragraph, about

12 10 or so lines up from the bottom of the page, you say

13 this:

14 "I recall I briefly spoke to someone from NWAS when

15 I arrived. I cannot recall who, but I do recall NWAS

16 were in the process of setting up a significant

17 operation at the scene."

18 Two questions, please. Can you now, having looked

19 back upon this statement, as undoubtedly you have, and

20 having thought about the conversation -- are you able to

21 assist us with who that was?

22 A. I can't say with any absolute certainty and it is

23 something I've obviously tried to do. The only possible

24 is -- in the notes that I made from my dictaphone in the

25 day after the attack, I referenced an individual called

1 Matt and put a question mark next to it in those notes.

2 I do wonder if that was Matt Calderbank. I can't say

3 100% whether it was him or not. I had a very brief

4 conversation to the effect of, how are you getting on,

5 how are you coping capacity-wise, and I moved on to find

6 the OFC.

7 Q. About two lines down from where we've just finished

8 reading, you say this:

9 "I also recall that at that time a number of

10 ambulances were arriving at the arena."

11 So this is in and around about 11.25:

12 "It was fairly clear when I arrived that a number of

13 NWAS resources had been deployed into the station from

14 the FCP."

15 So again, just to get our bearings, from just

16 outside the station where you'd first seen Dan Smith,

17 the operational commander, and into that casualty

18 clearing station area, just by the war memorial and

19 beyond that; is that right?

20 A. Yes.

21 Q. Thank you. Mr Dexter, could you turn now, please, to

22 {INQ029140/20} of your statement. I would like you to

23 look with me, please, at paragraph 58. You say this:

24 "I also reported that there were no GMFRS Fire

25 Service at the scene but that NWAS appeared to be

1 coping."

2 We have heard and seen the transcripts to that

3 effect this morning:

4 "I felt at the time that the NWAS response was

5 significant. I was a little surprised at how many units

6 they had been able to deploy to the scene."

7 Just help me understand what you mean by that. You

8 say you were a little surprised at just how many they'd

9 managed to get there.

10 A. So my experience in working in the police, in

11 Greater Manchester, is that NWAS, like the police, are

12 stretched most of the time and it's prioritisation. We

13 experience long waits quite often, as many people, I'm

14 sure, do for the police and for the Ambulance Service.

15 I was surprised at how quickly they had mobilised so

16 many units. That was just my thoughts at the time.

17 Q. Thank you. Finally this, and it's the conversation with

18 Steve Hynes, and we looked at two -- perhaps a number of

19 conversations that you had, but two in particular at

20 00.16 and 00.37.

21 We need neither the transcript nor the audio at this

22 stage, but it might help clarify -- and this is really

23 for the benefit of the chairman -- sir, we've been able

24 to communicate with Mr Suter, in fact Mr Hynes was not

25 told, and he at this stage of course, Mr Dexter, was the

1 Bronze or the operational commander, but Mr Hynes was
 2 not told about the existence of Operation Plato, the
 3 declaration, until 00.54. So it follows, Mr Dexter,
 4 that obviously the conversations you'd had with him at
 5 about 00.16 and 00.37, those preceded his being given
 6 that information.
 7 With that in mind, it was around about this time,
 8 wasn't it, that you told us that you knew also of there
 9 being gunshots or suspected gunshots at Oldham Hospital
 10 and that I think the staff had barricaded themselves in;
 11 is that right?
 12 A. That's right, and it was actually an NNAS commander that
 13 told me that.
 14 Q. Thank you. There was some debate earlier with
 15 Mr Greaney and yourself as to whether in fact North
 16 Manchester General Hospital was also a location where
 17 there was suspected criminal or potentially terrorist
 18 activity. And in fact, you're right about that,
 19 Mr Dexter, because there was also at North Manchester
 20 General Hospital, it was around about the same time as
 21 the apparent threat at Oldham Hospital, notes of
 22 a suspected package and talk about that particular
 23 hospital also being put into a potential lockdown. So
 24 those two features were operating away from the arena
 25 in addition to those threats and those fears that

1 you have told us about that were operating at or around
 2 the arena.
 3 Is it around about that time that you were having
 4 these conversations with Mr Hynes, the then Bronze
 5 operational commander?
 6 A. Yes, it is.
 7 Q. Was there any suggestion by any of the paramedics to you
 8 or any representative from NNAS or from anything that
 9 you saw them do or heard them say that they intended to
 10 stop treating the casualties that they were treating
 11 within the casualty clearing station?
 12 A. No.
 13 Q. Thank you. Did any apparent uncertainty or lack of
 14 clarity that you've been tested upon this morning and
 15 this afternoon as to whether the CCS, the casualty
 16 clearing station, was warm or cold or warm veering
 17 towards cold -- did any of that make any difference to
 18 the direction that Steve Hynes was giving to his own
 19 staff or for the treatment that was being given to the
 20 casualties within the casualty clearing station?
 21 A. Certainly not from what I saw, no.
 22 MS ROBERTS: Thank you, those are my questions.
 23 SIR JOHN SAUNDERS: Thank you very much, Ms Roberts.
 24 MR GREANEY: Mr Weatherby is taking the lead with the
 25 superintendent on behalf of the families and I'll call

1 on him next, please.
 2 Questions from MR WEATHERBY
 3 MR WEATHERBY: Thank you very much, Mr Greaney.
 4 Can I start, Mr Dexter, by saying that I ask
 5 questions on behalf of the families and none of my
 6 questions are intended to imply any criticism of what
 7 you did on the night, and in fact I want to thank you
 8 for the efforts that you plainly made to try to make the
 9 response as effective as possible.
 10 Can I ask you first about the dispute between
 11 yourself and Greater Manchester Police about the issue
 12 of whether you were armed or -- commander for unarmed as
 13 well. I'm not -- it's above my pay grade to get
 14 involved in the rights and wrongs of that, of course,
 15 but would you agree with me that the plans and policies
 16 should be crystal clear so that the force, Greater
 17 Manchester Police, and one of its most experience
 18 firearms commanders, does not have such a stark
 19 disagreement?
 20 A. That's clearly a yes.
 21 SIR JOHN SAUNDERS: I think we can all agree on that.
 22 A. What I would say, though, Mr Weatherby, on that is
 23 certainly the Whittle plan made it clear about declaring
 24 a major incident and JOPs made it clear so the two plans
 25 run concurrently. So accepting maybe the scope and

1 responsibility of the on-scene commander maybe needs
 2 some clarification. I think what is clear is that
 3 certainly under these circumstances, a major incident
 4 plan needed to run alongside the Plato to deal with the
 5 consequences.
 6 MR WEATHERBY: Sure, and basically your point is that you
 7 really needed two tactical commanders at the scene?
 8 A. Certainly a tactical commander and we can debate whether
 9 or not the on-scene commander is tactical. It's
 10 semantics around how the command structure works, but
 11 yes.
 12 Q. Okay. This is something you've raised all through,
 13 including raising it with your line commander,
 14 Mr Thompson, in a debrief; is that right?
 15 A. That's correct, yes.
 16 Q. I'll remind you. Can we put up {INQ029095/2}, please,
 17 Mr Lopez.
 18 This is the front page of it and this is just to
 19 orientate ourselves, your line manager,
 20 Superintendent Thompson, and can we now have
 21 {INQ029095/6}, please.
 22 It's just the top four lines:
 23 "Mr Dexter felt that on the night he attended the
 24 scene and took more of a major incident commander's role
 25 rather than being given the support to concentrate on

1 what he feels should have been his priorities within the
 2 role of ground—assigned TFC. There were no other senior
 3 officers present at the scene to take that role, leaving
 4 him to try and conduct both roles to the best of his
 5 ability .”
 6 What you were pressing to Mr Thompson, and he was
 7 putting in the debrief, was just that, that you needed
 8 a second person to deal with what you’re describing as
 9 the major incident roles?
 10 A. Yes, sir .
 11 Q. Thank you. We can take that down, Mr Lopez. Thank you
 12 very much.
 13 One of the points you’ve made, I think, this morning
 14 is that one of the difficulties in the two roles is that
 15 there are in fact two distinct radio channels, you’ve
 16 got the firearms channel and you’ve got the unarmed
 17 channel.
 18 A. Correct.
 19 Q. And having to listen to two radio channels at the same
 20 time is a bit of a problem?
 21 A. It would be, yes.
 22 SIR JOHN SAUNDERS: It’s impossible without two radios.
 23 A. You’d need two radios and then actually to hear,
 24 translate what is being said on (overspeaking) —
 25 SIR JOHN SAUNDERS: One in each ear?

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1 A. Yes. And the phone going as well.
 2 MR WEATHERBY: Again I’m illustrating the point here and
 3 then I’ll move on in a moment. No criticism on you, but
 4 Mr Greaney took you to your dictaphone at
 5 {INQ040657/33}. There’s just another entry I want to
 6 refer you to. Let’s orientate ourselves.
 7 {INQ040657/33}. This is an entry at 1 second to
 8 00.16, so almost exactly 00.16. We’ve looked at it
 9 before. Although you had in passing spoken to NWS
 10 people, at 00.16 you are still identifying who their
 11 incident commander was?
 12 A. That’s correct, yes.
 13 Q. That’s an example of the fact that, effectively ,
 14 although you’re doing your level best, you have got too
 15 much on your plate? Is that a fair way of summarising
 16 it?
 17 A. I think it’s fair , the first 5 minutes to an hour, it’s
 18 playing catch—up, finding out what is going on, so it
 19 has led to a delay, which is (overspeaking) —
 20 Q. No criticism of you, but that’s an illustration of what
 21 you’re indicating ; yes?
 22 A. Yes.
 23 Q. And then two pages on, {INQ040657/35}, please. It’s
 24 just the entry at 00.17.34. This is a conversation
 25 between you and Superintendent Nawaz, who at this point

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1 has stepped down from being Silver and he’s deputy
 2 Silver at HQ. At this point, you are trying to identify
 3 who the police Bronze at scene is; yes?
 4 A. Yes.
 5 SIR JOHN SAUNDERS: Just so I know from what you said
 6 before, that you think you probably should have said
 7 Silver?
 8 A. Yes, and this is probably where there’s some work to do
 9 on clarifying exact roles. Some will call it the
 10 incident commander on scene, some will call it tactical
 11 commander on scene. There’s a schematic that shows it
 12 as the Bronze officer on scene, with everything sat
 13 underneath it. It needs rationalising and simplifying
 14 it. Potentially what I’m referring to is the gap that
 15 I perceived on the night.
 16 MR WEATHERBY: In fact, two entries further on, you’ve
 17 obviously been told that it’s Inspector Smith because
 18 you say:
 19 “I have spoke to Mike.”
 20 Is that right?
 21 A. Yes, and I think that’s kind of making the point that
 22 I’ve seen Mike and I don’t think that’s his role.
 23 Q. Yes. Which is precisely where I was headed next,
 24 thank you for going there. So again, illustrative of
 25 the point that you’ve been making to us this morning.

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1 I will move to a different topic, and that is
 2 deployment. You have been asked a lot of questions
 3 about this so I will be brief. Just to summarise, you
 4 were actually woken up by a call from a PC from your own
 5 unit?
 6 A. Yes.
 7 Q. And whether you self—deployed or not is perhaps a matter
 8 of semantics, but you headed to the scene and on the way
 9 you volunteered to take ground—assigned TFC; yes?
 10 A. Yes.
 11 Q. Would you agree, reflecting back on that, had you not
 12 done so, there might have been further delay with having
 13 a tactical commander of any description at the scene?
 14 A. Yes, and I suppose another way of looking at it is had
 15 Plato not been declared by Mr Sexton, as was the case
 16 with BTP, I wouldn’t have even turned out.
 17 Q. Yes, exactly. I’m not in any way criticising you, quite
 18 the opposite, for volunteering to deploy; I just want to
 19 explore with you why that was necessary. It’s obviously
 20 something you had thought about because you’d actually
 21 made arrangements for that, hadn’t you?
 22 A. Yes, I think — it depends where you’re going.
 23 Q. Well, you’d asked the PC that actually phoned you to do
 24 so if a serious firearms incident occurred.
 25 A. I think it was more a general kind of — not instruction

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1 but a request if you get anything serious. It wasn't
 2 specific around firearms incidents or Plato, it was more
 3 (overspeaking) but yes.
 4 Q. So you'd asked for that arrangement to be made --
 5 SIR JOHN SAUNDERS: Okay, Mr Weatherby, I'm sorry, can you
 6 come back in a minute?
 7 I just want to perhaps raise something about BTP
 8 because you have just said that, "The FDO declared
 9 Plato, which BTP didn't".
 10 A. Yes.
 11 SIR JOHN SAUNDERS: On the other hand, they did actually
 12 declare a major incident --
 13 A. Yes.
 14 SIR JOHN SAUNDERS: -- and GMP didn't.
 15 A. Yes.
 16 SIR JOHN SAUNDERS: Wouldn't declaring a major incident have
 17 the same effect of getting senior commanders to the
 18 scene?
 19 A. It should do because --
 20 SIR JOHN SAUNDERS: Okay. Thank you. Sorry. Can you do
 21 your question again, Mr Weatherby? I'm sorry.
 22 MR WEATHERBY: Sure.
 23 You had made arrangements to be woken up, even if
 24 off duty, if there was a significant incident, whether
 25 it was a major incident or not doesn't matter for the

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1 purposes of my question. But Greater Manchester Police
 2 is obviously one of the biggest forces in the country.
 3 It has an on-call TFC, it has an on-duty Silver at all
 4 times, so why was that arrangement necessary?
 5 A. In general terms?
 6 Q. In general terms?
 7 A. In general terms the way specialist operations is
 8 structured is it cover the whole geographical force area
 9 so it's a functional responsibility. Our staff,
 10 certainly in specialist operations, are involved in
 11 a lot of high-risk incidents because of the nature of
 12 their skills and quite often they end up in incidents,
 13 death or serious injury referrals, fatal police pursuits
 14 or serious injury pursuits. So it was an offer, really,
 15 that when they are under pressure, I would come in and
 16 be the manager. It's a leadership issue.
 17 Q. Yes. But in a way, you're putting yourself on call
 18 permanently?
 19 A. I'm pragmatic about that. If I wasn't available or had
 20 had a drink, clearly I wouldn't come in, but it was an
 21 offer of help if they needed anything.
 22 Q. Yes. What I'm exploring with you is: is it the case
 23 that in fact the on-call arrangements weren't
 24 sufficient?
 25 A. I wouldn't say they weren't sufficient. I think it's

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1 more of a leadership thing. It's not something that was
 2 critical for me to be called in for everything, but it's
 3 just the way I operated at the time. So the on-call
 4 arrangements for this sort of incident, as you said, we
 5 had on-call TFCs, we had an on-duty Silver commander.
 6 The Plato does present a much greater challenge in terms
 7 of the number of commanders and at that point we rely on
 8 goodwill, I think.
 9 Q. Yes. That's where I'm headed with this line, is that on
 10 a Plato, effectively you want to have, as you ended up,
 11 with a TFC at HQ, and a ground-assigned TFC, don't you?
 12 And as swiftly as possible?
 13 A. Yes, as a minimum, probably, yes.
 14 Q. So do you think in terms of the on-call arrangements
 15 that should have been dealt with in a plan rather than
 16 leaving it to somebody to say, "Give me a call and if
 17 I've not had a drink, I'll turn out"?
 18 A. Yes, but because of the system we operated, we operated
 19 a 7/7 days, 7/7 nights TFC cover, so there was always an
 20 informal arrangement that if the night TFC required
 21 another TFC they could also ring the day TFC, and had
 22 that happened on the night and they'd have been ahead of
 23 me, I'd have given way to them.
 24 Q. And you would have turned round?
 25 A. Yes.

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1 Q. So there was in effect some kind of second tier or
 2 cascading system?
 3 A. Yes.
 4 Q. You proposed going to scene and that Chief Inspector
 5 Buckle went to HQ and you suggested that your boss,
 6 Superintendent Thompson, went to HQ. All of those on
 7 the face of it appear to have been entirely reasonable
 8 and proper suggestions. But would you not expect those
 9 kind of arrangements to have come from either the
 10 initial TFC or the strategic firearms commander? Wasn't
 11 it really for them to grasp the nettles?
 12 A. ACC Ford would have been in a similar position to me and
 13 making her way in, making lots of calls. We know
 14 Mr Sexton was busy. I obviously had a close
 15 relationship with those individuals because I work in
 16 the same department so I put the calls in. I think had
 17 I not, somebody would have anyway, just maybe I got
 18 there first.
 19 Q. I'm sure that's a generous comment on your behalf. Did
 20 you on the way in attempt to gain situational awareness?
 21 A. To a degree I did. I had the Talk Group on that the
 22 firearms operation was running on, I keep a kit bag in
 23 my house, so I had that. But as you'd imagine, it was
 24 a bit patchy, I was driving very quickly, the phone was
 25 ringing, so it was patchy. I can remember listening to

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1 what was going on and you could start to -- I was
 2 starting to get the impression of the scale.
 3 Q. Did you try and get it from the OCR, from the FDO or any
 4 of the staff there?
 5 A. I think I did transmit on the radio. But I certainly
 6 wouldn't have had a long narrative conversation over the
 7 radio. I was more absorbed in what was going on.
 8 Q. Yes. You arrived at scene approximately 50/52 minutes
 9 from the detonation. Entirely not your fault. You were
 10 travelling from where you were. But would you agree
 11 that's a long time to not have any tactical commander at
 12 the scene of an incident like this?
 13 A. Yes. Albeit it is mitigated by having the OFC and
 14 inspector, but it is a long time, yes. I can imagine if
 15 you're at the scene, it's a long time to wait, yes.
 16 Q. And that was again a point I think you made yesterday
 17 about the deployment of a Silver, that if a Silver had
 18 been deployed earlier, then they would likely have got
 19 to the scene before you and would have been able to make
 20 an impact on some of the joint working with other
 21 emergency services, even if not with the armed policing
 22 aspect of it; yes?
 23 A. Potentially, yes.
 24 Q. Finally on the deployment point, you've told us that
 25 you were involved in deploying resources to Piccadilly,

1 involved in directions about what was happening at the
 2 Etihad, and then later with respect to Oldham. All of
 3 these were matters for the TFC at HQ, weren't they?
 4 Isn't there a line to be drawn between your role on the
 5 ground when you are already burdened or perhaps
 6 overburdened with the roles that you've got there?
 7 Isn't this really something that the TFC at HQ should
 8 have been dealing with? Again I'm not criticising you
 9 for doing it, but in terms of the -- part of the reason
 10 for having different roles is so that everything gets
 11 done in a proper way as quickly as possible.
 12 A. So there clearly is a case in terms of having a division
 13 of responsibilities, yes, and that would almost
 14 certainly in a slower-time incident would be more
 15 important. I think in fairness around the Etihad,
 16 I think there were collaborative conversations with
 17 those I was speaking to, certainly around Oldham Royal,
 18 actually that did get handed over to Mr Thompson.
 19 Q. Yes.
 20 A. There was pragmatic deployment decisions made, but in
 21 terms of command of that I did that quite quickly.
 22 Q. I'm not criticising you or the decisions; I'm just
 23 saying you had a lot on your plate and others had that
 24 role.
 25 A. Yes.

1 SIR JOHN SAUNDERS: I wanted to ask you this: very early on
 2 in your evidence, you indicated that if there had indeed
 3 been gunmen at Oldham Hospital, you would have gone
 4 there to be ground--assigned there.
 5 A. Most likely. Unless they had another --
 6 SIR JOHN SAUNDERS: How do you know that?
 7 A. We had conversations afterwards, Craig and I, and he
 8 said, I would likely send you up there.
 9 SIR JOHN SAUNDERS: Thank you.
 10 MR WEATHERBY: Very quickly on training, you were asked
 11 about Winchester Accord, and you had a role in it. You
 12 and told Mr Greaney that you weren't aware of the two
 13 key problems that we've been hearing about, which is the
 14 overloading of the FDO and the failure to declare Plato
 15 to the emergency services, who certainly didn't turn up
 16 for a very long period of time. Were you surprised to
 17 learn about that, presumably after 22 May, were you
 18 surprised that you weren't aware of that before 22 May
 19 given that you're a senior, experienced firearms
 20 commander?
 21 A. Probably not around the FDO issue because it sits in a
 22 department and is independent from where I work and
 23 I don't know how that information flowed but I probably
 24 would not have seen that in my role, so I'm not
 25 surprised about that bit, no.

1 Q. If you had been aware of it, do you think that heading
 2 to the scene, knowing about those two problems from
 3 Winchester Accord, it would have added to your -- to the
 4 matters that you were considering and what had to be
 5 done on the night?
 6 A. Possibly.
 7 SIR JOHN SAUNDERS: You're an operational officer, you are
 8 likely to be called up, as indeed you were on this
 9 incident. Wouldn't be a good idea for you to know what
 10 had been the problems on a live exercise a year before?
 11 A. Yes, and I think sometimes the danger with exercise
 12 lessons learned is sometimes that the issues that are
 13 raised are sometimes as a result of the way the exercise
 14 is ran and managed as opposed to the actual true
 15 operational issues.
 16 SIR JOHN SAUNDERS: Maybe.
 17 A. So if they'd been able to identify whether it was the
 18 way the exercise was managed versus, actually, this is
 19 going to be the reality, then yes it would be.
 20 SIR JOHN SAUNDERS: Thank you.
 21 MR WEATHERBY: Not to put too fine a point on it, we know
 22 that in Winchester Accord the declaration wasn't
 23 communicated to the waiting emergency services so they
 24 didn't turn up for a very long period of time. The
 25 chairman may find that there was a similar problem here.

1 Had you known about that, it might have been something
 2 that you'd have spoken to Mr Sexton about on the way in
 3 or when you spoke to him?
 4 A. Yes, and, you know, if (inaudible) questions had been
 5 asked about what I'd do differently, if I had to go
 6 through this again, I'd be more careful about presuming
 7 what had been done and maybe get more of a "what do you
 8 know, where do we need to go". That's one of the things
 9 I'd do differently .
 10 Q. Thank you for that. Finally on training, we know that
 11 following discussions after Winchester Accord, Mr Giladi
 12 arranged for joint commanders' training days in January
 13 and February 2017. We've attempted to get hold of
 14 attendance lists. Am I right that you were not at any
 15 of the 3 days when that joint commander training was
 16 done?
 17 A. I picked this up in evidence, I remember going to
 18 a joint training exercise at Thompson Street
 19 Fire Station. I've checked my Google account and the
 20 mapping system shows that I was there on one of the
 21 days.
 22 Q. So you were?
 23 A. I remember -- I need to 100% clarify it and I've given
 24 that to my legal... It's there.
 25 Q. Finally this, and it's a small but I think quite

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1 important point. Mr Greaney took you to the reference
 2 to the media, the press, that James Allen referred to.
 3 We don't need to put it up because we've looked at it.
 4 It was at 00.12 and he was asking about what was
 5 happening with the press. Mr Greaney put to you that
 6 you were presumably unimpressed by this enquiry. It may
 7 be obvious, but can you tell us why you were unimpressed
 8 by it?
 9 SIR JOHN SAUNDERS: I'm slightly reluctant about this.
 10 Mr Allen was never asked about it. We've already heard
 11 from GMP how important they thought it was to keep the
 12 press notified. I don't mind if he's going to be asked
 13 but I'm not sure (overspeaking) by what may be
 14 speculation by the witness as to why. Do you want to
 15 answer the question? No doubt you had better things to
 16 do, obviously.
 17 A. Unimpressed is probably strong. I certainly didn't
 18 think it was my priority but I did give him the press
 19 officer's number at the time. Warning and informing the
 20 press is important. James -- I didn't know James, I've
 21 obviously met him since. I didn't realise he was the
 22 venue manager, but as a venue manager, that would be
 23 at the forefront of his thinking.
 24 SIR JOHN SAUNDERS: So there may be a perfectly reasonable
 25 explanation?

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1 A. I didn't think it was anything I could resolve.
 2 MR WEATHERBY: I won't take that any further. Thank you
 3 very much for answering those questions. Those are all
 4 I have.
 5 MR GREANEY: The final advocate who wishes to and has
 6 permission to ask questions is Mr Davies, who represents
 7 the interests of the superintendent. Before he does
 8 that, both Mr Atkinson and Mr Cooper have indicated that
 9 they don't have questions but there is something that
 10 they would wish to say and, if they are allowed to say
 11 it now, it may be go some way to shorten the questions
 12 that Mr Davies feels he has to ask. I'm going to invite
 13 them to say what they wish to say in the order in which
 14 they raised it with me, so first of all Mr Atkinson,
 15 please.
 16 MR ATKINSON: Mr Dexter, just on behalf of those families
 17 that I have the privilege to represent, this was a very
 18 challenging job on the most challenging of nights, and
 19 we do wish to thank you for the dedication that you
 20 brought to this very difficult job.
 21 A. Thank you.
 22 MR COOPER: With the inquiry's leave, Mr Dexter, I too am
 23 instructed on behalf of the families we represent to
 24 thank you and commend you for attending on the night,
 25 doing your duty in the most trying of circumstances

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1 in the face of adversity. The families are grateful .
 2 A. Thank you very much.
 3 MR GREANEY: Mr Davies, please.
 4 Questions from MR DAVIES
 5 MR DAVIES: I'm just going to start, if I may, by indicating
 6 something that I'm not going to ask you about, which is
 7 your views on training and exercising. You will reduce
 8 that to writing as invited. I know you have more to
 9 say.
 10 The second issue, taking it very shortly. Did you
 11 read or follow the questioning on your behalf of
 12 DCC Ford --
 13 A. I did, yes.
 14 Q. -- by Mr Wood in relation to the use of the word "fire"
 15 and associated material?
 16 A. Yes.
 17 Q. Does that line of questioning reflect your
 18 interpretation in relation to that issue?
 19 A. Yes.
 20 Q. Again in relation to fire, in relation to your
 21 experience of major incidents, in particular perhaps
 22 training of major incidents, what would have been your
 23 expectation in terms of fire deploying to a scene if it
 24 wasn't able to obtain information through the force duty
 25 officer for whatever reason?

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1 A. To have gone to an RVP if there was one known.
 2 Q. But to send somebody to the scene as a matter of
 3 initiative ?
 4 A. Yes.
 5 Q. Let me go on then, please, because I want to concentrate
 6 in the time we have on considerations that may have
 7 a longer-term application to future incidents rather
 8 than further evidence as to the immediate incident,
 9 right?
 10 I come straightaway to the definition and role of
 11 a GATFC. Because I think it's common ground, this isn't
 12 a purely academic issue; do you agree?
 13 A. Yes.
 14 Q. It's not academic because if a GATFC in that role
 15 attends a mass casualty terrorist event, not knowing the
 16 parameters of their role, then operational compromise is
 17 likely to result, isn't it?
 18 A. Yes.
 19 Q. To the detriment of minimising loss of life ?
 20 A. Potentially, yes.
 21 Q. So it's important?
 22 A. Yes.
 23 Q. I'm going to take this at headline level because the
 24 documents are so familiar. JOPs, please, Mr Lopez,
 25 {INQ008372/1}.

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1 In seeking to summarise your position, I hope not
 2 oversimplifying, your position is that as a matter of
 3 definition, function and purpose, on-scene commander, as
 4 used here, in relation to the police GATFC is the
 5 on-scene Plato commander?
 6 A. That's my understanding, sir, yes.
 7 Q. And the document, not that we need reminding, page 1, i
 8 after all entitled :
 9 "Responding to a marauding terrorist firearms attack
 10 and terrorist siege."
 11 A. Correct.
 12 Q. If we could go to page 2, please {INQ008372/2}. The
 13 passage you've been referring to, I believe, in terms of
 14 its interrelationship with other major incident
 15 procedures is in paragraph 2, line 4:
 16 "This guidance should be used to inform existing
 17 major incident procedures and must be used in
 18 conjunction with local and national standard operating
 19 procedures."
 20 A. Yes.
 21 Q. That's the interrelationship you're identifying .
 22 {INQ008372/4}, please, the glossary. You gave
 23 answers to Mr Greaney on the first day of your evidence.
 24 Again summarising it, that this is a dynamic operational
 25 role in the context of responding to a terrorist attack,

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1 where the fundamental objective is to get emergency
 2 resources into a scene to minimise loss of life rather
 3 than putting a cordon around it to keep people out?
 4 A. Yes.
 5 Q. So it's a question of defining a dynamic boundary, isn't
 6 it, limits of exploitation ?
 7 A. Yes.
 8 Q. Which may move in a marauding attack with you?
 9 A. Correct, yes.
 10 Q. And you define that limit of exploitation with other
 11 on-scene commanders under this policy?
 12 A. Yes.
 13 Q. And having so defined the limit of exploitation, as
 14 GATFC to some extent you may give direction to so-called
 15 unarmed assets?
 16 A. Correct, yes.
 17 Q. But in terms of a Silver unarmed commander, it would
 18 enable you to turn to them and say, "You deal with the
 19 consequences, here's the zone"?
 20 A. Yes.
 21 Q. Is that oversimplifying or is that a fair summary?
 22 A. It's a fair summary.
 23 SIR JOHN SAUNDERS: Mr Davies, let me stop you for a moment.
 24 No one is doubting for a moment that Mr Dexter's
 25 view, as he has given, of what is meant and what his

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1 role was is absolutely a genuinely held view. No doubt
 2 others who have given a contrary view have genuinely
 3 held views. I have already indicated that it seems to
 4 me it's for the people who devised Plato and JOPs and
 5 the major incident manual to actually say which is
 6 right. I do not expect it to be part of my job to do
 7 that and it seems to be inappropriate for me to do it.
 8 So I am grateful for what Mr Dexter said, I do
 9 understand what he's saying, and certainly if he wants
 10 to put it in writing in more clarity, I'm sure you've
 11 already told people you work for what your view is. But
 12 by all means add that to the recommendations you would
 13 wish to make in writing and I will make sure it gets to
 14 the right authorities and hopefully they will sort it
 15 out sooner rather than later, and waiting for my report
 16 is not appropriate.
 17 MR DAVIES: I understand. I do agree that the definitional
 18 approach in the document is not necessarily for this
 19 witness. I was going to take him to the limits of
 20 exploitation definition but I won't.
 21 The document can come down and I will move on, sir.
 22 SIR JOHN SAUNDERS: I wasn't meaning to stop you, I was just
 23 indicating my position.
 24 MR DAVIES: I don't wish to labour an interpretive approach
 25 to every witness.

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1 Practicalities . You have confirmed, as the chairman
 2 put it, the impossibility of handling two radios at once
 3 plus a mobile phone.
 4 A. Yes.
 5 Q. When AFOs are deployed in vehicles together, are they
 6 ever given responsibility for concurrent radios in that
 7 way are or they separated?
 8 A. Within a vehicle they'll have access to more than one
 9 radio, so they will have the vehicle set and each AFO
 10 will have a radio so there is an option to monitor other
 11 channels, but once out on the ground I think that would
 12 be quite difficult .
 13 Q. Just one question: DCC Ford said she thought there would
 14 be command conflict if you were other than in command of
 15 all the assets on the ground. Do you think there would
 16 be a command conflict?
 17 A. No, I think that's part of the reason that you have them
 18 at the scene so you can communicate together to deal
 19 with that issue .
 20 Q. Right. A simple question: we've seen, dramatically,
 21 that there came a point where you clearly believed there
 22 was a secondary attack at Oldham Hospital.
 23 A. Yes.
 24 Q. Had that proved to be what it appeared to be, would you
 25 have had operational capacity as GATFC to deal with that

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1 and potentially go to that scene as well as retaining
 2 command of unarmed assets at the arena?
 3 A. No.
 4 Q. Had you left the scene in that context, would there have
 5 been a vacuum created in terms of situational awareness
 6 as you left it , literally , in your memory?
 7 A. Yes.
 8 Q. Next question, and I will again take it briefly . You
 9 followed the evidence and from multiple parties, but
 10 what was your expectation culturally of whether NWS and
 11 fire would have deployed their, even specialist , assets
 12 into a warm zone?
 13 A. I think culturally , they would.
 14 Q. Right.
 15 A. Certainly my experience of working with NWS and fire
 16 is that they were quite committed to this.
 17 Q. Yes. What about non-ballistically protected?
 18 A. I think that would have been a bit more of a problem in
 19 an MTFA, yes.
 20 Q. Final point. This inquiry, quite properly, is reviewing
 21 in granular detail each person's role from each
 22 organisation on the night of this terrorist atrocity .
 23 No doubt many who were directly involved are following
 24 it . But should this happen again, different people
 25 would be involved, different place, different

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1 circumstances --
 2 A. More than likely, yes.
 3 Q. -- and so on and so forth. It might be said that the
 4 Plato principles here in a sense were a distraction on
 5 the night operationally and complicated what may have
 6 been approached as a mass casualty, spontaneous major
 7 incident, requiring cross-agency response but with
 8 a firearms response integrated to that.
 9 A. Yes.
 10 Q. Do you follow?
 11 A. Yes.
 12 Q. In other words, individuals and agencies falling back on
 13 what's been described more than once as individual and
 14 organisational muscle memory for how to respond to
 15 a major incident.
 16 A. Yes.
 17 Q. What is your view as to whether a distinct
 18 Operation Plato model of some kind adds to the
 19 situation , bearing in mind the difficulties of training ,
 20 the rarity of these events, and so on, or subtracts from
 21 it -- please don't refer to any specifics in the new
 22 policies -- as a matter of principle based on your
 23 specialisation ?
 24 A. I think the principle of Plato is absolutely right .
 25 Certainly in the most severe circumstances, which it was

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1 written for, as terrible as this was, but the ongoing
 2 element of it, I think Plato works. The scaling-up and
 3 activation works. And I think the JOPs can work as can
 4 JESIP. As long as we get the right people -- and there
 5 are some issues around training, aren't there? The
 6 right people and communicating together, it can work.
 7 Q. Fundamental is early cross-agency communication, isn't
 8 it?
 9 A. Yes.
 10 MR DAVIES: Sir, I think that's all I need to explore.
 11 SIR JOHN SAUNDERS: Thank you.
 12 Pursuing that for a moment, has it got too
 13 complicated? Never mind about the principle of Plato,
 14 but has the whole thing got too complicated now? Could
 15 we reduce its complexity?
 16 A. I don't think it's too complicated, I think it's about
 17 training it properly. That's not a criticism , it's very
 18 difficult to get lot of people trained, so you're really
 19 looking for different levels of training and whether you
 20 target ... But I don't ...
 21 SIR JOHN SAUNDERS: You know it really well because you're
 22 a geek, you said?
 23 A. Yes.
 24 SIR JOHN SAUNDERS: Not everyone is going to be a plans
 25 geek. You can't reach for the plan on the night,

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1 can you?
 2 A. No, but if you look at the major incident plan, people
 3 say it's 200-plus pages, but actually, when you condense
 4 it down into the parts that you're likely to take,
 5 actually it's relatively clear.
 6 SIR JOHN SAUNDERS: Should someone condense it down then?
 7 A. It almost is, isn't it? So if you go to the tactical
 8 commander section, there's an annex around what the role
 9 is of the tactical commander versus the room manager.
 10 So I think it's about people being clear on where they
 11 need to look for their role. I'm not saying there can't
 12 be improvements, sir, but I think actually, as a plan,
 13 broadly speaking, it's not a bad plan.
 14 SIR JOHN SAUNDERS: Okay.
 15 A. Plato and JOPs have moved on as well. Inevitably, they
 16 deal with an evolution of the threat.
 17 SIR JOHN SAUNDERS: Thank you. Thank you very much,
 18 Mr Davies.
 19 MR GREANEY: Sir, thank you. I don't have any further
 20 questions. Unless you do, that is the end of the
 21 evidence today.
 22 SIR JOHN SAUNDERS: You volunteered to go in on the night,
 23 you didn't have to, but you did, and it's to your great
 24 credit that you did. When you got there, you took
 25 decisive action and you were doing your best to ensure

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1 that lives were saved and, as far as you could, you did.
 2 All the other details we will need to work on, but I'd
 3 be very grateful to get your recommendations in writing.
 4 I'm also very grateful that you have thought so deeply
 5 about it and so constructively about what's gone wrong
 6 and how to put it right.
 7 A. Thank you.
 8 MR GREANEY: Thank you, sir. 9.30 on Monday morning,
 9 please.
 10 SIR JOHN SAUNDERS: Thank you very much.
 11 (3.05 pm)
 12 (The inquiry adjourned until 9.30 am on
 13 Monday, 24 May 2021)
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