

OPUS2

Manchester Arena Inquiry

Day 105

May 18, 2021

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1 Tuesday, 18 May 2021
 2 (9.30 am)
 3 (Delay in proceedings)
 4 (9.46 am)
 5 SIR JOHN SAUNDERS: Good morning.
 6 MR GREANEY: Sir, good morning, I'm very sorry that we're
 7 starting a little late this morning. I know you don't
 8 like that, but there was a lot to do before we began.
 9 SIR JOHN SAUNDERS: Fair enough. Thank you.
 10 MR GREANEY: The witness in the witness box is Deputy
 11 Chief Constable Debbie Ford.
 12 DCC DEBBIE FORD (affirmed)
 13 Questions from MR GREANEY
 14 MR GREANEY: I'm just being asked if you wouldn't mind
 15 keeping your voice up so that everyone in the -- you
 16 can't hear anything? Right.
 17 SIR JOHN SAUNDERS: We'll have to sort that out.
 18 (Pause)
 19 MR GREANEY: I'm going to try again. No? Still not
 20 working.
 21 Sir, would you rise for just a few moments so this
 22 can be sorted out? Now it's working. There we are.
 23 I'm very sorry for that, deputy chief constable.
 24 Let's hope things run smoothly from now on. Would you
 25 begin, please, by telling us your full name?

1

1 A. It's Deborah Ford.
 2 Q. In May 2017 were you an assistant chief constable with
 3 Greater Manchester Police?
 4 A. Yes, I was.
 5 Q. Did you have responsibility for the serious crime and
 6 public protection divisions of that force?
 7 A. Yes.
 8 Q. Did you from time to time perform duties as duty
 9 Gold commander?
 10 A. Yes, I did.
 11 Q. Were you the duty Gold commander on the night of
 12 22 May 2017?
 13 A. I was, yes.
 14 Q. Were you also the duty strategic firearms commander, or
 15 SFC, that night?
 16 A. Yes.
 17 Q. Did you perform both roles during the course of the
 18 response to the Manchester Arena attack?
 19 A. I did, yes.
 20 Q. I'm going to begin by dealing with your background,
 21 training and experience. So first, please, in summary
 22 your service history. Did you join Northumbria Police
 23 in October 1993?
 24 A. Yes.
 25 Q. And, in your first period with that force, serve in all

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1 ranks up to the rang of temporary assistant
 2 chief constable?
 3 A. Yes, I did.
 4 Q. In June 2016 did you transfer to Greater Manchester
 5 Police on promotion to the rank of substantive assistant
 6 chief constable?
 7 A. Yes, I did.
 8 Q. And then in June 2018, so 13 months after the arena
 9 attack, did you return to Northumbria Police, first as
 10 assistant chief constable?
 11 A. Did you say June 2018?
 12 Q. I did.
 13 A. It was December 2018.
 14 Q. Thank you. I have misread something from the internet.
 15 Then in March of 2019, were you promoted to the position
 16 of deputy chief constable in that force,
 17 Northumbria Police?
 18 A. I was promoted in June 2019; I sat the assessment
 19 process in March.
 20 Q. Thank you very much. And since June 2019, have you been
 21 the deputy chief constable of Northumbria Police?
 22 A. Yes, I have.
 23 Q. So effectively the number 2 within that force?
 24 A. That's right, yes.
 25 Q. Next, I'm going to turn to deal with your training and

3

1 experience. Rather than deal with that in chronological
 2 order, I'm going to seek to deal with it by topic area.
 3 The topics are: (1), the joint emergency services
 4 interoperability principles, JESIP; (2), command,
 5 including firearms command; (3), a very important issue
 6 for reasons that you'll understand, Operation Plato;
 7 (4), the role of the FDO; and (5), your
 8 counter-terrorism training and, in particular,
 9 experience. That's the way in which we're going to deal
 10 with the first chapter of your evidence.
 11 Let's begin with JESIP. As the chairman knows, this
 12 was first rolled out from 2012 to 2014. We have what is
 13 described as your combined training record. I'm going
 14 to ask that we have that on screen, please.
 15 Mr Lopez, it's {INQ041223/2}, please.
 16 The very bottom of that page indicates that on
 17 23 April 2014, so it's four entries up from the bottom,
 18 there was a course, "Joint Emergency Services
 19 Interoperability (JESIP) -- Tactical Commanders", but
 20 that you did not attend. Do you see that?
 21 A. Yes, I do.
 22 Q. Are you able to confirm whether you did or did not
 23 attend that course?
 24 A. I believe I did attend the course for two reasons -- and
 25 obviously when I did my first statement I asked for

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1 checks to be done about my training records. I believe
 2 I attended because I remember the training very clearly.
 3 It was being rolled out at the time. One of my roles
 4 was superintendent in the force resilience unit so
 5 I worked within the LRF functions, civil emergencies,
 6 in that role and as JESIP was being rolled out I was
 7 very aware, because I was part of the roll-out in the
 8 force, that this was mandatory training.

9 The second reason is I remember attending the
 10 training. It was at the Fire Service Headquarters in
 11 Tyne & Wear, Barmston Mere. I remember actually being
 12 on the course and when I have subsequently done checks
 13 with my HR department in Northumbria to say why is it
 14 recorded I didn't attend, it has been unclear in terms
 15 of the answers and the paperwork, so my evidence would
 16 be that I did attend that course.

- 17 Q. So what we can be clear about is that during the
- 18 roll-out --
- 19 A. Yes.
- 20 Q. -- you have a distinct recollection that you did attend
- 21 --
- 22 A. Absolutely, yes.
- 23 Q. -- JESIP training, so it would seem to follow that the
- 24 record is in error?
- 25 A. Yes.

1 Q. And what we're going to see as we look at some other
 2 aspects of this training record is that there are some
 3 quite stark omissions from it, do you agree?

- 4 A. Omissions in terms of?
- 5 Q. In terms of courses you did attend but are not recorded.
- 6 A. Yes.
- 7 Q. As you know from a discussion we had before we started
- 8 your evidence, you are not the first officer who has
- 9 given evidence whose training records have been not
- 10 complete or inaccurate and it may be in due course the
- 11 chairman will want to say something in his report about
- 12 that. I know you have a view and so would you express
- 13 it, please?
- 14 A. Yes, absolutely. As I said, when I did my original
- 15 statements I made requests of my force as was at the
- 16 time to get my training records and, similarly, when
- 17 I transferred to GMP there was an issue about
- 18 transferring the training records across to GMP. And
- 19 subsequent to that, this is a combined collection of
- 20 various systems that have been looked at to produce this
- 21 record and because of the need to demonstrate competence
- 22 and credibility in terms of training, and we do
- 23 undertake a substantive amount of training, so I think
- 24 it's important it's documented correctly. It does feel
- 25 there should be a solution or some kind of central

1 repository, whether that's the College of Policing who
 2 attend to accredit our courses who could do that on
 3 behalf of all forces, because it creates issues and
 4 tensions when we believe we have undertaken training,
 5 and it's important training, for us to be able to
 6 demonstrate that the appropriate records are being kept.

7 SIR JOHN SAUNDERS: I'm quite happy to make a recommendation
 8 if it's appropriate -- this must be something which
 9 comes up on a regular basis. Do you know why nothing
 10 has been done about it so far?

- 11 A. To be fair, sir, I don't think it does. I think the
- 12 issues in forces are that we all have technology systems
- 13 that are either old, antiquated or just they're not kept
- 14 up-to-date appropriately and some of that is because
- 15 some of those departments have been probably reduced in
- 16 staffing numbers, so the focus on this hasn't been
- 17 there. I do think there is something that could be
- 18 done, absolutely. We are putting a new HR IT system --
- 19 Q. I am just being asked if you would slow down a little
- 20 bit. It's not (inaudible: distorted), but for the
- 21 purposes of the stenographer.
- 22 A. Sorry. In terms of having that record, because most of
- 23 the training is centrally delivered training, so the
- 24 ability just to manage that process at the centre would
- 25 be beneficial, I think, and cuts out the issues of

1 individual forces.
 2 SIR JOHN SAUNDERS: Okay. I'm not computer literate, not
 3 very, but the idea of entering on to a computer that
 4 someone has attended a course and that being recorded
 5 doesn't seem very difficult --

- 6 A. I agree, sir, it seems a very straightforward thing,
- 7 however --
- 8 SIR JOHN SAUNDERS: -- or affected by cutbacks,
- 9 particularly.
- 10 A. But it's the people who then upload them on to the
- 11 system, it's dependent on when you attend a course, you
- 12 sign a sheet to say you have enrolled, that's a piece of
- 13 paper, there's not an electronic solution to that, and
- 14 then the record-keeping and transfer of those records on
- 15 to a central database that's easily accessible for the
- 16 purpose of things like public inquiries is an eminently
- 17 sensible approach, but IT systems are so different, they
- 18 don't talk to each other, so I think there is a role
- 19 somewhere. Certainly the College of Policing would be
- 20 the place that I would see as keeping the records up to
- 21 date, especially with accredited important training.
- 22 SIR JOHN SAUNDERS: Okay.
- 23 MR GREANEY: Nobody is going to think this is the biggest
- 24 learning point in this inquiry, but you regard it as
- 25 important there should be, in relation to each officer,

1 a complete record of the training that he or she has --
 2 A. Yes.
 3 Q. -- undertaken? And so far we have seen records both
 4 from GMP and now from Northumbria which seem to be
 5 incomplete, so there would appear to be a problem that
 6 needs to be resolved.
 7 In all events, back to your training. You make
 8 clear that you attended the roll-out of the JESIP
 9 training. In any event, I'm going to invite you to
 10 confirm that there were other courses that you attended
 11 that seemed to be relevant to joint working. First,
 12 although not on your combined training record, in
 13 November of 2015, did you attend and pass what is known
 14 as the Senior Police National Assessment Course?
 15 A. Yes, I did.
 16 Q. Then between January 2016 and March 2016 did you attend
 17 and pass the College of Policing strategic command
 18 course?
 19 A. Yes.
 20 Q. Did both of those courses have a JESIP input?
 21 A. The first one you referred to there is the actual
 22 assessment centre to get on to the SCC, that's just
 23 2 days of exercises, so no.
 24 Q. I see.
 25 A. The strategic command course has an operational policing

1 module and a large part of that is understanding
 2 strategic command in an operational setting. Part of
 3 that training is a full-day MAGIC course, so the
 4 Multi-agency Gold Incident Command, a full tabletop
 5 exercise attended by --
 6 Q. You're going quite quickly again, so I hope you won't
 7 think I'm rude when I slow you down from time to time.
 8 A. That's fine.
 9 So that MAGIC day is a full tabletop multi-agency
 10 exercise, so to tease out the JESIP principles, to talk
 11 about what we do. In addition, on the strategic command
 12 course, as well as doing that full day, there are inputs
 13 around JESIP, there are inputs about learning from other
 14 inquiries, we did a lot about CT command and how
 15 strategic command would link in with CT command.
 16 Q. I'm going to come to that, but that's very clear.
 17 Between January and March 2016, so ending 14 months
 18 before the arena attack, you attended the strategic
 19 command course, which you'll confirm, I'm sure, is
 20 a course designed to prepare police officers for
 21 promotion to the most senior ranks within the police?
 22 A. Yes.
 23 Q. It's open only to superintendents and chief
 24 superintendents?
 25 A. On the police side, yes.

1 Q. And as you have told us, it involved, among other inputs
 2 on JESIP, a full-day multi-agency exercise?
 3 A. That's right, yes.
 4 Q. If we can return to your training records and go please
 5 to the next page, {INQ041223/3}. We can see that on
 6 22 July 2016, you attended an emergency services
 7 interoperability tactical commander course.
 8 A. Yes, that's an NCALT training package that's online.
 9 Q. On 25 September 2016, you attended or took part in the
 10 multi-agency Gold incident command course or the MAGIC
 11 course?
 12 A. That entry there refers to the pre-course requirement to
 13 complete the NCALT training package, which is online,
 14 but I attended the MAGIC course for 3.5 days in October
 15 that year.
 16 Q. Is that a course -- I'm at paragraph 34 of your first
 17 statement -- that brings together category 1 responders
 18 and their key partners --
 19 A. Yes, that's right.
 20 Q. -- in order to understand the strategic command of major
 21 incidents or civil emergencies?
 22 A. Yes.
 23 Q. Did you on that course receive learning from, among
 24 other major incidents, the 7/7 bombings?
 25 A. Yes.

1 Q. When it came to your reaction on the night of the arena
 2 attack, how useful was that course in particular?
 3 A. It was particularly useful. There were certain elements
 4 of the course that I had in the forefront of my mind
 5 because the emphasis was very much on
 6 Lord Justice Clarke's findings in relation to the
 7 Marchioness disaster and the DVI process, but equally
 8 the learning from the 7/7 bombings in particular, the
 9 aspects where family members were left without
 10 information for many, many hours and not understanding
 11 what had happened to their loved ones, so there were
 12 some very useful inputs on that course. And working --
 13 and we did a Hydra exercise, a tabletop exercise, as
 14 well on that course but in my mind on the night they
 15 were the two things I recalled from the course as being
 16 most beneficial in helping me address the circumstances
 17 of that tragedy on that night.
 18 Q. So we can see that by the time we reach 22 May 2017, you
 19 had received extensive training in multi-agency working?
 20 A. Yes.
 21 Q. And moreover, would it be correct to say that you had
 22 substantial on-the-ground experience of working with
 23 your emergency service partners?
 24 A. Yes.
 25 Q. The way you put it in your witness statement, which I'll

1 ask you to confirm is this, this is paragraph 6:
 2 "Throughout my service I have had roles which have
 3 required me to work with other agencies and partners in
 4 pre-planned and spontaneous situations. The nature of
 5 the situation or incident determines who I have worked
 6 with."
 7 A. Yes.
 8 Q. Whilst you were within Northumbria Police and serving as
 9 a superintendent, did you set up a particular unit which
 10 is of relevance of this issue?
 11 A. Yes, I mentioned that earlier that's the force
 12 resilience unit.
 13 Q. And was that a unit designed to manage force resources,
 14 deliver events and operations, civil contingencies
 15 planning and preparedness, and also testing and
 16 exercising multi-agency responses for different
 17 scenarios?
 18 A. Yes. That's right.
 19 Q. Were you, whilst in Northumbria, also a member of their
 20 Local Resilience Forum?
 21 A. I was, yes.
 22 Q. Did that involve working with the Fire and Rescue
 23 Service and Ambulance Service?
 24 A. Yes.
 25 Q. And other agencies in emergency response planning?

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1 A. That's right, yes.
 2 Q. So I think it comes to this, just to finish off the
 3 first topic relating to your training and experience: we
 4 should, do you agree, have no doubt that, as of
 5 May 2017, you were familiar with the practice of joint
 6 working and would it also be reasonable to conclude that
 7 you recognised the importance of joint working,
 8 particularly in the context of responding to a major
 9 incident?
 10 A. Yes.
 11 Q. The second topic under this heading: command including
 12 firearms command. Could we have the second page of the
 13 training record on the screen, please? {INQ041223/2}.
 14 In 2010, did you become a temporary superintendent?
 15 A. Yes, I did.
 16 Q. In that role did it become necessary for you to receive
 17 a series of additional qualifications?
 18 A. Yes.
 19 Q. So we can see that on 1 April 2010, you became
 20 a strategic firearms commander; is that correct?
 21 A. No, that's not correct. I became a tactical firearms
 22 commander, TFC.
 23 Q. Is that an error in the training record or have
 24 I misread it in some way?
 25 A. No, I'd corrected that when I previously submitted it.

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1 Having seen this training record, I don't know they
 2 would have recorded me as a strategic firearms
 3 commander.
 4 Q. So you became a tactical firearms commander?
 5 A. I was a tactical firearms commander.
 6 Q. That's a helpful correction, thank you.
 7 The record reveals that you were operationally
 8 competent; is that correct?
 9 A. Yes.
 10 Q. And what does that term, which we'll come across again,
 11 mean?
 12 A. You attend to become a tactical firearms commander,
 13 at the time I attended, a spontaneous course and then
 14 subsequently a pre-planned course. So by completing and
 15 passing the assessment centres on those two courses
 16 I became occupationally competent to undertake those
 17 roles.
 18 In order to become operationally competent, each
 19 force has a structure and in Northumbria you're required
 20 to undertake a period of shadowing with a fully
 21 qualified TFC who would assess your competence and
 22 subsequently you would undertake two pre-planned and two
 23 spontaneous incidents in respect of firearms. And if
 24 you were assessed -- and on the particular occasion
 25 I was interviewed by the superintendent in charge of our

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1 operations department --
 2 Q. That's quite fast again, I'm sorry.
 3 A. So having completed shadowing and completed the two
 4 assessments, I was interviewed by the superintendent in
 5 charge of the operations department who was responsible
 6 for firearms commanders, and we had a kind of mini
 7 assessment and then he signed me off as being
 8 operationally competent to undertake the tactical
 9 firearms command role.
 10 Q. So it is done in stages?
 11 A. Yes.
 12 Q. Was 2010, this is my phrase, the first time that as
 13 a police officer you entered the firearms world or had
 14 you had previous experience in firearms?
 15 A. My only previous experience was obviously as an
 16 inspector, Bronze commander, working around firearms
 17 operations as a response inspector, but no qualification
 18 or any other contact with firearms.
 19 SIR JOHN SAUNDERS: Just help me: Mr Greaney introduced this
 20 as saying, because you became a temporary superintendent
 21 it became necessary for you to become a tactical
 22 firearms commander.
 23 A. Yes.
 24 SIR JOHN SAUNDERS: Is that true of everybody who becomes
 25 a temporary superintendent?

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1 A. In Northumbria, the requirements of a superintendent or
 2 temporary superintendent was to work on the Silver
 3 cadre.
 4 SIR JOHN SAUNDERS: So you need to have it for that?
 5 A. And in Northumbria, the Silver commander has to be
 6 a tactical firearms commander as well. In GMP it's
 7 a split function, in Northumbria there was a requirement
 8 in order to undertake the duties expected of our Silver
 9 cadre at the time —
 10 SIR JOHN SAUNDERS: Sorry, draw breath for a moment. It's
 11 all right, I'm sorry to be rude. It's just that I want
 12 to go on to the next point about this.
 13 We have heard that Superintendent Nawaz, for
 14 example, did not have that qualification, he wasn't
 15 required to have it in GMP. Would it be a good idea, in
 16 your view, if the Northumbria model was followed now
 17 your loyalty has obviously changed, but looking
 18 objectively?
 19 A. When I came to GMP, I did look at the posts and think
 20 why are they split. I believe because of the scale and
 21 nature of firearms threat in this region compared to
 22 what we experience in the north—east, it felt to me that
 23 it was appropriate that the firearms command cadre was
 24 separate to the Silver. The advantages in Northumbria
 25 of being both are quite obvious in terms of you have

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1 that full responsibility, but the demands placed in
 2 Northumbria are far less in terms of firearms command,
 3 so the ability to do everything is probably better
 4 placed there. In GMP, there is a big demand from
 5 a firearms perspective.
 6 SIR JOHN SAUNDERS: Just stopping again, I've got the point,
 7 but it does mean that you do have the Night Silver
 8 commander, I don't know on how many times he will not
 9 have any firearms ability, but you must get lots of
 10 firearms incidents in Manchester during the
 11 night—time —
 12 A. Yes.
 13 SIR JOHN SAUNDERS: — which will have to be managed by the
 14 Night Silver.
 15 A. No, they'd be managed by the cadre, the TFC and the
 16 initial TFC as well, so the structure's entirely
 17 separate.
 18 SIR JOHN SAUNDERS: Okay.
 19 A. If it's a spontaneous firearms incident, the force duty
 20 officer, ITFC, will take immediate command. If it's
 21 going to be protracted, they will call the firearms
 22 cadre. I would utilise the unarmed Silver, the night
 23 duty Silver, for broader issues around community impact
 24 and consequence management, so they may be involved.
 25 I think there was an absolute case that there has to be

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1 an awareness of firearms command training and inputs and
 2 operation plans, ie Plato, for a night duty Silver to be
 3 able to understand the context in which they are
 4 operating.
 5 SIR JOHN SAUNDERS: Okay. For the purpose of an
 6 Operation Plato, which is very much, as we have heard,
 7 an armed response, particularly immediately, would it
 8 not be a benefit for the Night Silver to have that
 9 necessary firearms training? Was it a disadvantage
 10 having Superintendent Nawaz untrained in firearms,
 11 in the night duty, on a Plato?
 12 A. I think on this occasion, yes, the lack of knowledge of
 13 Plato was a significant issue on the night amongst not
 14 only Superintendent Nawaz but other members of staff who
 15 were directly involved.
 16 SIR JOHN SAUNDERS: Thank you.
 17 MR GREANEY: We're going to get on to this. It's helpful to
 18 start to focus the issues.
 19 But on the night, let's be frank about it,
 20 Superintendent Nawaz was far from being the ideal
 21 candidate for the role that initially he had?
 22 A. I believe as a Silver commander he would have been able
 23 to discharge his responsibilities as a tactical Silver
 24 commander and get grip and command over the incident if
 25 he understood what the on—scene police commander and the

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1 Bronzes were doing.
 2 SIR JOHN SAUNDERS: I'm really going to stop you on that
 3 because I find that really difficult. So immediately
 4 the Night Silver is told by the FDO, "This is a Plato
 5 incident and we have issued a", and I forget the
 6 technical term for the search.
 7 A. An emergency search.
 8 SIR JOHN SAUNDERS: Two critical pieces of information he is
 9 given about the incident, neither of which he
 10 understood. So to say he's ideally suited to deal with
 11 the immediate response just can't be right. He actually
 12 didn't know what was going on immediately.
 13 A. Yes, sorry, sir, I might have misunderstood or I have
 14 misrepresented what I was trying to say there. In terms
 15 of his ability — if he knew what Plato was and if he
 16 understood that Plato meant that we were responding in
 17 a tri—service way to this incident at the arena, and
 18 that an on—scene commander would be in place and that
 19 on—scene commander would have responsibility under JOPs,
 20 and we should have trained him on this, he should have
 21 understood his role within that, not to take scene
 22 command but to be able to look at the major incident
 23 arrangements, to understand what's happening at the
 24 scene to gain situational awareness. So I don't think
 25 it's necessary he needs to get himself involved in the

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1 immediate command, but he needs to find out what's
 2 happening because he should know, or should have known
 3 if he had been trained and was aware, that actually the
 4 structure would follow that ITFC would be running it as
 5 is, an on-scene commander would be identified, and that
 6 could have been the OFC or Mike, and ultimately it was
 7 Mark Dexter. And Superintendent Nawaz would have a role
 8 in that in terms of that broader tactical Silver
 9 command. It's just he clearly wasn't aware of how he
 10 plugged into that because he didn't know what Plato was
 11 so he didn't know what was happening under JOPs. If
 12 that makes sense, sir.
 13 MR GREANEY: It does make sense but I lost count of how many
 14 ifs there were in the explanation you gave. I do
 15 appreciate that you don't want to criticise
 16 Superintendent Nawaz and nor do I.
 17 A. Absolutely.
 18 SIR JOHN SAUNDERS: And nor do I. That was not a criticism
 19 of him; he hadn't been trained in those things at all.
 20 MR GREANEY: The criticism may well be a criticism of the
 21 organisation for failing to ensure he had the necessary
 22 training. But the upshot on the night, stripping away
 23 the ifs and stripping away the buts, was that he was not
 24 competent to perform the role that he was initially put
 25 into.

1 A. I think that's a fair assessment because he hadn't been
 2 given the training and knowledge that he should have had
 3 in order to fulfil that role that night.
 4 Q. That does or may reveal a systemic problem that you had
 5 someone in that critically important role that wasn't
 6 qualified for it.
 7 A. Absolutely. And finding out in the midst of an
 8 incident, an attack that someone doesn't know what Plato
 9 is -- and I have seen the broader evidence, sir, from
 10 the force duty officer's team -- the lack of awareness
 11 of Plato was something that organisationally GMP needs
 12 to or should have considered beforehand, which it
 13 certainly needs to consider now.
 14 Q. And as you'll appreciate, we'll come back to these
 15 issues -- or maybe we will stay with them for the time
 16 being.
 17 SIR JOHN SAUNDERS: We will. I have again forgotten the
 18 special meaning of the search.
 19 A. The emergency search, sir.
 20 SIR JOHN SAUNDERS: Thank you. In a way, that's as
 21 important to know what that means, is it, as what
 22 Operation Plato meant? He needed to know that he'd got
 23 armed police going in to an area with a specific
 24 authority to do certain things which were -- well, they
 25 were there to get rid of any gunmen. They had authority

1 to shoot people.
 2 A. Yes.
 3 SIR JOHN SAUNDERS: Isn't that absolutely vital? Even on
 4 different occasions, if you're going to manage an armed
 5 incident around Manchester of any sort, don't you need
 6 to know what an emergency search is?
 7 A. Again, from a firearms command perspective, as the
 8 firearms commanders we understand what that means and
 9 looks like, but I entirely take your point that if you
 10 were also tactical Silver commander and you have no
 11 understanding of what that tactic looks and feels like
 12 and how it's being undertaken, it will seriously inhibit
 13 your ability to carry out your functions, yes.
 14 SIR JOHN SAUNDERS: One more question and then I'll shut up
 15 and leave it to Mr Greaney; he's meant to be doing this.
 16 When do you know as the Gold commander on duty
 17 whether your Night Silver that you've got there, that
 18 night, whether he has that firearms training? Would you
 19 know yourself of each of your Silver commanders working
 20 with you whether they had that training, that knowledge?
 21 A. No, I would -- and obviously because the cadre is split,
 22 I wouldn't have an expectation that they would have
 23 firearms training. But it would only be if I'd worked
 24 with individuals to know whether they had that
 25 dual-hatting.

1 SIR JOHN SAUNDERS: Thank you.
 2 MR GREANEY: So it is tempting to start delving into these
 3 big issues with you right at the outset, but I'm going
 4 to step back and just return to your training and
 5 experience because it is going to inform some of these
 6 issues when we start to look at them in detail.
 7 We know that you became a tactical firearms
 8 commander in 2010. Your record indicates, tell me if
 9 this is wrong also, that you then gained qualifications
 10 as Silver, both in relation to firearms and public
 11 order.
 12 A. Yes, a Silver public order commander and tactical
 13 firearms commander, that's correct.
 14 Q. And subsequently, you gained practical experience as
 15 Silver, is that also correct?
 16 A. Yes.
 17 Q. So on the night of the arena attack you would have had
 18 a clear understanding of what the role and
 19 responsibilities of a Silver commander were?
 20 A. Yes.
 21 Q. Again, I can't find it in the combined training record,
 22 but I know from your witness statement that in
 23 September 2014, you attended a five-day Gold commander's
 24 course.
 25 A. Public order Gold commander, is that right?

1 Q. That was public order, was it?
 2 A. I think so, yes.
 3 Q. It's paragraph 9 of your — it leads into paragraph 9 of
 4 your statement. We'll get to that.
 5 A. Yes, that was public order.
 6 Q. Was that a nationally accredited pass—or—fail course?
 7 A. Yes, that's right.
 8 Q. And you passed?
 9 A. Mm—hm.
 10 Q. Did you become operationally competent as
 11 a Gold commander, public order, in January 2015?
 12 A. I did, yes.
 13 Q. And subsequently, did you retain that accreditation so
 14 that you still had it in May 2017?
 15 A. Yes, I did.
 16 Q. I think it would be right to say that you were
 17 Gold commander thereafter for many, many events?
 18 A. Yes, I was.
 19 Q. Including such things as the Great North Run?
 20 A. Yes.
 21 Q. Derby football matches?
 22 A. Mm—hm.
 23 Q. And the Sunderland International Airshow?
 24 A. Yes, that's right.
 25 Q. Shortly after becoming operationally competent as Gold

25

1 in that respect, did you attend a strategic firearms
 2 commander national course?
 3 A. Yes, I did.
 4 Q. I'm sorry to jump around so much in your witness
 5 statement, but your statement jumps around. It is
 6 paragraph 28 of your statement. Did you attend that
 7 course between 9 and 13 February 2015?
 8 A. Yes.
 9 Q. Again, was that a pass—or—fail course that you passed?
 10 A. Yes, I did.
 11 Q. What is the successful completion of that course
 12 a prerequisite of?
 13 A. A prerequisite of becoming a strategic firearms
 14 commander.
 15 Q. So what therefore is the aim of the strategic firearms
 16 commander course?
 17 A. To make sure that we are trained to provide effective
 18 strategic command to a firearms incident.
 19 Q. Having passed both your Gold public order and SFC
 20 courses, were you classed as occupationally competent?
 21 A. Yes, I was.
 22 Q. And subsequently did you shadow and undertake further
 23 force assessments to become operationally competent
 24 prior to full deployment in those functions?
 25 A. Yes, I did.

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1 Q. Did you become both occupationally and operationally
 2 competent in those roles, Gold public order and SFC, in
 3 early 2015?
 4 A. Yes.
 5 Q. And thereafter retained your accreditation in both
 6 disciplines so you held them in May 2017?
 7 A. Yes, that's correct.
 8 Q. Moving on in time to very near to the date of the arena
 9 attack, between 7 and 12 May 2017, I'm now at
 10 paragraph 36 of your statement, did you attend what was
 11 known as the specialist strategic firearms commander
 12 course?
 13 A. Yes, I did.
 14 Q. What was the purpose of that course?
 15 A. So the specialist course is designed to train currently
 16 accredited firearms commanders in dealing with
 17 operations which are more focused on either national
 18 security or counter—terrorism matters, so more kind of
 19 higher—threat incidents.
 20 Q. Both higher—threat and I suppose higher—risk situations?
 21 A. Yes, that's correct.
 22 Q. In short, is that course an advanced version of the
 23 SFC/TFC training that you had undertaken?
 24 A. I wouldn't say it's advanced, I'd say it's different in
 25 terms of its content and its focus.

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1 Q. I'm going to ask my next question in an open way because
 2 there may be a disagreement between you and another
 3 officer about it. During the course of that course, did
 4 Operation Plato feature?
 5 A. It did. It wasn't part of the course content, but it
 6 featured in terms of an input from government
 7 in relation to requests for specialist asset resources,
 8 I'll say.
 9 Q. So would it be fair to say that there was limited input
 10 during that course on Operation Plato?
 11 A. It was referenced but there was no direct input on Plato
 12 itself.
 13 Q. We were dealing, as you'll remember, with the topic of
 14 command, including firearms command. As for command we
 15 know that you attended and passed the strategic command
 16 course in early 2016.
 17 A. Yes.
 18 Q. That included training or instruction in major incident
 19 command; is that correct?
 20 A. That's right, yes.
 21 Q. And at paragraph 41 of your statement, you draw matters
 22 together in the following way which I'll ask you to
 23 confirm:
 24 "My learning and knowledge from attendance on the
 25 specialist firearms course, learning from the strategic

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1 command course and MAGIC course, along with my
 2 experience as an SFC, and undertaking strategic and
 3 tactical command roles over the previous 7 years
 4 provided me with some knowledge and experience which
 5 I was able to draw on when faced with the
 6 Manchester Arena attack on 22 May 2017.”
 7 A. Yes, that’s correct.
 8 Q. I’ve emphasised the word, you said “some knowledge and
 9 experience”. Did you feel as a result of the training
 10 and experience that you had that you were fully equipped
 11 to perform the role that you performed on 22 May or
 12 something less than fully equipped?
 13 A. I think what I mean by that is I was as equipped as
 14 I could be to undertake those roles, given I had never
 15 dealt with or been faced with a terrorist attack as
 16 we were faced with on the night of the 22nd. But that
 17 experience at strategic and tactical level set me in
 18 good stead to deal with the incident that was unfolding
 19 on the night.
 20 Q. Were there, as you look back after 22 May, any areas in
 21 which your training was deficient or could have been
 22 improved upon?
 23 A. I wouldn’t say it was deficient. I think that the
 24 application of Operation Plato, for example, bearing in
 25 mind this is the first time we had applied

1 Operation Plato, our training is done in the firearms
 2 environment, and we talk about Operation Plato as the
 3 response, but I do think on reflection we could do much
 4 more in terms of awareness and understanding and
 5 application of Operation Plato because we do CPD days,
 6 we have 6–hour or 3–hour refresher training sessions.
 7 But was that sufficient in terms of how it was applied
 8 on the night? We were doing it live time for the first
 9 time. I do feel there was much more that we could have
 10 done previously, perhaps, which would have assisted on
 11 the night.
 12 Q. That’s a very frank answer that we’ll come back to and,
 13 as you will maybe appreciate, one of the other issues
 14 in relation to Plato that I’ll want to explore with you,
 15 which is connected with but separate from training, is
 16 the issue of the policy itself, that is to say is it too
 17 rigid, should it involve a greater degree of discretion,
 18 but we’ll get to that issue in due course.
 19 The third topic on training and experience, we’ve
 20 covered to some extent already, it’s Operation Plato.
 21 You have told us that there was limited input on the
 22 specialist strategic firearms commanders course. We’ll
 23 come back to what materials you had read about Plato in
 24 due course. Had you received any other training in
 25 Plato prior to 22 May 2017?

1 A. Yes. So in terms of tactical firearms command, yes, and
 2 in terms of being a strategic firearms commander and
 3 undertaking CPD and annual refreshers, certainly in the
 4 kind of previous 12 months, Plato formed part of that
 5 refresher training that we received in firearms. And
 6 also under Operation Tempered, a tabletop exercise,
 7 Plato was referred to there as Tempered might be part of
 8 a response ultimately to a Plato.
 9 Q. And you have helpfully explained already that you felt
 10 you could have done with more training on that topic and
 11 we will return to that.
 12 The fourth experience issue, counter–terrorism.
 13 When you were the temporary assistant chief constable in
 14 Northumbria did you have responsibility for
 15 counter–terrorism for a period of time?
 16 A. Yes.
 17 Q. Are you able to remember now for what period you had
 18 that responsibility?
 19 A. I was temporary ACC for approximately 10 months before
 20 I went to the strategic command course, so 10 months.
 21 Q. Furthermore, whilst in GMP did you have responsibility
 22 for counter–terrorism for a period of time?
 23 A. Yes, the North–west Counter–terrorism Unit, 6 months.
 24 Q. Was that 6 months during 2016?
 25 A. That’s correct, yes.

1 Q. In summary therefore, subject to the proviso that you
 2 indicated earlier, would it be fair to say that you had
 3 been extensively trained in the role that you had to
 4 perform on the night of 22 May?
 5 A. Yes, that’s correct.
 6 Q. Let’s turn then to 22 May and deal, first of all, with
 7 the early stages of that day.
 8 Was the 22 May a normal tour of duty to begin with?
 9 A. Yes, it was.
 10 Q. We know that you were duty Gold that night. Had you in
 11 fact started a period of duty Gold on 21 May?
 12 A. Yes, I did.
 13 Q. Was duty Gold a 24–hour–a–day role?
 14 A. Yes.
 15 Q. Was it a role that required you to be at a police
 16 station throughout all of those 24 hours?
 17 A. No, it didn’t. You could take periods of rest,
 18 obviously, throughout that 24–hour period.
 19 Q. And indeed we’re going to discover that when you
 20 received the first call about the arena attack you were
 21 in fact at home and in bed.
 22 A. Yes.
 23 Q. Did being duty Gold in GMP also involve undertaking the
 24 strategic firearms commander responsibility?
 25 A. Yes, it did.

1 Q. And also Gold public order responsibilities ?
 2 A. Yes, it did.
 3 Q. In May 2017, did duty Gold form just part of, although
 4 a very important part of, a 24-hour on-call command
 5 structure?
 6 A. Yes.
 7 Q. Which included duty Silver?
 8 A. Yes, correct.
 9 Q. A tactical firearms commander?
 10 A. Yes.
 11 Q. A senior investigating officer ?
 12 A. Yes.
 13 Q. And of course there was an FDO 24 hours a day?
 14 A. Yes.
 15 Q. By May of 2017, you had been an officer of Greater
 16 Manchester Police for 11 months; is that correct?
 17 A. Yes.
 18 Q. Had you first performed Gold duty in early July of 2016?
 19 A. Yes, I did.
 20 Q. And thereafter had you performed Gold duties on a number
 21 of occasions prior to 22 May?
 22 A. Yes.
 23 Q. So would it be reasonable to conclude that Gold duty was
 24 a responsibility that you were familiar with?
 25 A. Yes, I was.

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1 Q. As you took to your bed on the night of 22 May, did you
 2 know that there was a concert on at the arena?
 3 A. No, I didn't.
 4 Q. In your witness statement, paragraph 52, you tell us:
 5 "I didn't know there was a concert on at
 6 Manchester Arena, but that was not unusual as there was
 7 no GMP policing for the event and the arena fell under
 8 the responsibility of BTP to police."
 9 A. Yes.
 10 Q. What do you mean by that?
 11 A. I mean that generally if there is an event or operation
 12 anywhere, and GMP have some policing footprint, I would
 13 be aware of that as the GMP Gold. So in this
 14 circumstance, what I'm saying is I didn't know there was
 15 a concert at the arena, but my understanding was that
 16 we wouldn't necessarily have been notified because it
 17 was generally undertaken by BTP.
 18 Q. Again, I'm going to ask you to help us in relation to
 19 the issue of what might be improved. Do you think, now
 20 that you look back, that it would be better if GMP did
 21 know ahead of time about such events taking place?
 22 A. Yes, absolutely.
 23 Q. Would it be better if GMP moreover was provided with any
 24 risk assessment that had been carried out by those
 25 responsible for the safety and security of those

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1 attending such a concert?
 2 A. I think it would be beneficial if there was risk
 3 associated with it which would lead to GMP needing to
 4 support that event or have some policing input.
 5 Q. Really, that leads into the next thing I was going to
 6 ask about because I was going to suggest that without
 7 being provided with such information, including as to
 8 risk, GMP will lack information about the likelihood of
 9 any security issue to which you may be required to
 10 respond?
 11 A. Yes.
 12 Q. It will lack information about the form that that
 13 security issue may take?
 14 A. Yes.
 15 Q. Because at the very least, do you agree, GMP, when there
 16 is an event on at the arena, may have to deal with
 17 a very large number of people leaving that venue at
 18 about the same time?
 19 A. Yes, that would naturally follow and I think if there
 20 was a profile of an audience at the arena that night
 21 that may go on to cause issues within the city centre,
 22 and that's anticipated, I believe GMP would have been
 23 made aware for that very purpose.
 24 Q. Let's just turn to the night, because I believe that
 25 a consequence of you not knowing that there was

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1 a concert on, let alone who the artist was, was that
 2 during the very early stages of having been informed you
 3 had to go on to the internet in order to look up who
 4 Ariana Grande was?
 5 A. I did, yes.
 6 Q. In order that you could work out the likely audience
 7 profile, which took up, I'm not suggesting a lot, but it
 8 took up some of your time on what was a critical period,
 9 do you agree?
 10 A. It took a few seconds to do, but yes, it give me an
 11 indication of the audience profile.
 12 Q. At 22.52 --
 13 SIR JOHN SAUNDERS: Sorry, do you mind if I just ask a
 14 question about that?
 15 I thought the evidence was that in general terms,
 16 actually GMP did know about the fact that there was
 17 a concert, because they were invited to the monthly
 18 meetings, but we'll just check on that.
 19 The fact that there's an audience of 14,000 going to
 20 be at something and they're all going to come out on the
 21 street, irrelevant of the audience profile, is that not
 22 something that GMP ought to at least be aware of?
 23 A. I think there's probably two things there. One is GMP
 24 may have been aware of the event, but it would have been
 25 within the events planning team, I suspect, and if there

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1 is nothing to indicate that there is a risk associated
 2 with it, there will be lots of events running every
 3 night, I'm sure, at the arena, the necessity for them to
 4 tell GMP and that then to be articulated to the people
 5 on the command structure would depend, I think, if there
 6 were other factors that may come into it, so it's not
 7 necessarily the case that we need to know. I can
 8 understand why people are looking and saying, actually,
 9 it's a huge arena, lots of people, but these events run
 10 all the time across the country in big arenas. The
 11 necessity for the local police to know would probably be
 12 born of if there were factors of note or interest or
 13 things that might need policing and responding to.

14 SIR JOHN SAUNDERS: We've been hearing a lot about the risks
 15 associated with this concert and risk assessments, and
 16 one of the things that's been identified is that people
 17 look at risk basically in terms of, as you've just been
 18 doing, the sort of people who go to the concert, or
 19 whatever the event is, and there's some sort of separate
 20 category talking about the national threat level being
 21 severe. If you have an event attracting 14,000 people
 22 and you've got a threat level which is severe, why
 23 is that not something which, put together, GMP should be
 24 aware of and conscious of?

25 A. Yes, I agree that that would make sense. But in terms

1 of that severe, an attack is highly likely in that
 2 environment, you could make the case that, yes, we
 3 should have been aware that there was a big concert with
 4 a large audience in a crowded place.

5 SIR JOHN SAUNDERS: Because there's potential for attack?
 6 A. Yes, because there's potential for attack, absolutely.

7 MR GREANEY: It might be thought there are any number of
 8 reasons why GMP should have been aware. Obviously you
 9 were to become aware.

10 A. Yes.

11 Q. The audience profile was going to involve a lot of
 12 children and young people attending?

13 A. That's correct, yes.

14 Q. So just to give one example, there was an obvious
 15 prospect that GMP might have to deal with children
 16 outside the venue, lost or unable to find parents?

17 A. That is a possibility, yes. But obviously, at that type
 18 of event, which probably had an age restriction and
 19 parents attending with their children -- I've dealt with
 20 events in football stadiums where we've put in place
 21 a huge safeguarding operation outside the footprint of
 22 the event, but that depends on the circumstances. So
 23 maybe not on this occasion it would be necessary because
 24 there were parents in attendance.

25 Q. The other reason, as the chairman has identified,

1 is that you knew as a force that the threat level was
 2 severe.

3 A. Yes.

4 Q. And here was an American singer playing to
 5 a predominantly young audience. Is it not obvious that
 6 that's something that GMP ought to have been aware of?

7 A. I think it would have been useful for us to be aware
 8 that there was an event at the arena, but again these
 9 events do take place on a very regular basis, so
 10 knowledge that there was an event taking place perhaps
 11 would have been of benefit in terms of just reporting it
 12 in so we know. But necessity -- because in terms of
 13 prevention and preparedness and CTSA assessments of the
 14 arena, I would expect those had already been undertaken
 15 and risk assessments are in place, which in this case
 16 meant that we weren't notified of the event.

17 Q. I was moving on to 22.52, you are at home, in bed, and
 18 at that time were you awoken by a telephone call?

19 A. I was, yes.

20 Q. Was the call from Night Silver, Superintendent Nawaz?

21 A. Yes.

22 Q. We know from an audio schedule that we will need to look
 23 at from time to time, but I don't think we need to turn
 24 it up at the moment, that that call lasted for 2 minutes
 25 and 58 seconds. And obviously, I would like to hear

1 from you what you were told. A way to enable you to
 2 help us with that is to look at a document that you
 3 prepared in the aftermath.

4 A. Yes.

5 Q. In the period after the arena attack were you invited on
 6 a number of occasions to give a presentation to those
 7 who might benefit from the experience --

8 A. Yes.

9 Q. -- the very particular experience you'd had? Was the
 10 purpose of the presentation to enable others to learn
 11 from that experience?

12 A. It was, yes.

13 Q. And it would seem to follow that when you prepared that
 14 presentation, things would have been clear in your mind;
 15 is that correct?

16 A. Yes.

17 Q. So I'm just going to ask that we put on the screen
 18 a page of that presentation in which you deal with what
 19 you were told by Superintendent Nawaz. It's
 20 {INQ040503/11}.

21 Could you go back to -- it might be {INQ040503/8} of
 22 the document. That isn't the correct page. No, the
 23 wrong reference. We'll come back to it.

24 I'd ask you to help us from your own memory and the
 25 research you have done and tell us what it was that

1 you were told by Superintendent Nawaz in that call.
 2 Paragraph 55 of your statement addresses this if that
 3 helps.
 4 A. Yes, of course. So Arif Nawaz rang me, woke me up, and
 5 he said to me that he was sure the FDO would have
 6 contacted me already, but a lone male had walked into
 7 the Manchester Arena, detonated a vest and blown
 8 themselves up. He went on to tell me that a number of
 9 people had been killed and that Operation Plato had been
 10 called by the force duty officer. He didn't have much
 11 information, I recall, at the time, and suggested to me
 12 that 10, 12 or possibly 20 people were dead or injured.
 13 He didn't have any information...
 14 Q. Don't worry, it is quite quick. You've got all this
 15 information in your head. I followed what you were
 16 saying.
 17 SIR JOHN SAUNDERS: It's also very difficult, I do
 18 understand, for people who talk quickly to suddenly try
 19 and slow down. Take the odd breath, that's a good idea.
 20 MR GREANEY: He told you that he thought that the FDO would
 21 have been in touch with you?
 22 A. Yes.
 23 Q. I'll ask in a moment if that was correct. There had
 24 been an explosion at the arena and there were multiple
 25 fatalities. Would you pick it up from there, please?

1 A. He didn't have any information as to who was actually
 2 involved. He told me that the concert was at the arena
 3 and it was an Ariana Grande concert. And I think, in
 4 terms of my recollection, that was probably about as
 5 much information as he had at the time.
 6 Q. Do you remember that he also said at the end of the
 7 conversation, "What do you want me to do"?
 8 A. Yes, I do.
 9 Q. Just a small number of things arising out of that.
 10 First of all, Superintendent Nawaz said he thought
 11 that the FDO would have been in touch with you. Had you
 12 in fact been contacted by the FDO by that point?
 13 A. No.
 14 Q. Should he have contacted you?
 15 A. At some point, given that a firearms authority had been
 16 given and Operation Plato had been called, I would have
 17 expected that Dale would have, at the appropriate
 18 moment, made contact with me to discuss the firearms
 19 authority and seek ratification.
 20 SIR JOHN SAUNDERS: Could you explain "appropriate moment"
 21 for me?
 22 A. Yes. It varies, sir, to be honest. An appropriate
 23 moment would be when there's a natural pause point --
 24 SIR JOHN SAUNDERS: So it's when he is not busy with other
 25 things?

1 A. Absolutely, yes.
 2 SIR JOHN SAUNDERS: Thank you.
 3 MR GREANEY: Would it be fair to say that bearing in mind
 4 that you were Gold that night, he really needed to make
 5 it a priority to speak to you?
 6 A. It would have been very beneficial to have spoken to me,
 7 yes.
 8 Q. And so your answer was certainly diplomatic, it might be
 9 thought generous. This was now 21 minutes after the
 10 bomb had gone off, it was well over 10 minutes,
 11 approaching 20 minutes, after he had found out. Should
 12 he have made contact with you by 22.52?
 13 A. Again, like I say, it would have been beneficial if
 14 he had, but I understand why he would have found that
 15 very difficult.
 16 SIR JOHN SAUNDERS: Are you, as someone who's
 17 a Gold commander, aware, and no doubt we're going to
 18 come to this, of the fact that the FDO can just get
 19 overburdened very quickly and overwhelmed?
 20 MR GREANEY: We're coming to that in some detail in due
 21 course.
 22 SIR JOHN SAUNDERS: I will leave it for the detailed answer.
 23 MR GREANEY: But your answer does accommodate the fact that
 24 you understood that he would have been under a lot of
 25 pressure.

1 A. Absolutely, and my experience is that force duty
 2 officers in both GMP and the FOMs in Northumbria would
 3 contact us as soon as they were able to or in order to
 4 hand over command or seek ratification. So that is my
 5 experience, they do, but it can take some time.
 6 Q. Or if they are under enormous pressure, to delegate it
 7 to someone else to make contact with Gold?
 8 A. Yes.
 9 Q. But that hadn't happened by 22.52?
 10 A. No.
 11 Q. When you were interviewed by Lord Kerslake you explained
 12 that the FDO had subsequently apologised to you for
 13 that; is that correct?
 14 A. Yes, Dale and I actually had our first conversation on
 15 the Tuesday evening and we discussed that, and when we
 16 spoke he apologised and my response was: there's no need
 17 to apologise, I understand the pressures you were under.
 18 Q. In the presentation that we tried to look at but didn't,
 19 you said of the FDO that, and this was I think
 20 understatement, "There was quite a lot for the FDO to
 21 do"?
 22 A. Yes.
 23 Q. "He did a great job"?
 24 A. He did, yes.
 25 Q. That was, no doubt, your view then, that the FDO did a

1 great job, does it remain your view now?
 2 A. Yes, it does. I think the point I'd make about all the
 3 staff on that night, including the FDO, was they did an
 4 exceptional job in the circumstances they were facing.
 5 They did the best they possibly could, but certainly
 6 I thought Dale Sexton in particular, given that
 7 significant role he had, did an outstanding job.
 8 SIR JOHN SAUNDERS: And that also includes the decisions
 9 that you now know he made?
 10 A. No, sir, not in respect of that. I think it was an
 11 incredibly difficult position, but the decision, no,
 12 definitely not.
 13 MR GREANEY: Again, that's something that, as you will
 14 appreciate, we will need to come to in some detail.
 15 The second thing arising out of that first call is
 16 that it ended with Superintendent Nawaz asking you what
 17 you wanted him to do. What did you say in response?
 18 A. I asked him to make sure -- I believe it was the SIO was
 19 contacted, that media were contacted, and that -- my
 20 kind of initial response to this, bearing in mind I was
 21 just woken up, was that we would need to get command and
 22 control as quickly as possible established. So I asked
 23 him to open up the Gold and Silver rooms at force
 24 headquarters.
 25 Q. This is another thing we're going to get to in due

1 course. In giving him the instruction to open the Gold
 2 and Silver rooms, did you anticipate that he would open
 3 them in the same place or in different locations?
 4 A. In the same locations.
 5 Q. And it would seem to follow from what you've said that
 6 you anticipated that Superintendent Nawaz would go not
 7 to the scene but instead to force headquarters?
 8 A. In terms of what I said, I didn't consciously direct him
 9 to not go to the scene or to go to force headquarters,
 10 but I was comfortable with the fact that he went to
 11 force HQ.
 12 SIR JOHN SAUNDERS: Did you know by the end of the phone
 13 call that that's where he was going to go?
 14 A. Again, it's difficult for me to say 100%, but yes,
 15 I would suspect, given the direction I'd given him, that
 16 he would go to the FCM.
 17 MR GREANEY: Given where you expected the Gold and Silver to
 18 be opened, he was hardly going to be able to open them
 19 unless he went to the force headquarters?
 20 A. Given the fact that the purpose of the request was to
 21 establish tactical command and strategic command at
 22 a location, that's where I'd have expected him to be,
 23 yes.
 24 Q. One thing I think that you've been told by
 25 Superintendent Nawaz during that first call was that

1 Operation Plato had been declared by the force duty
 2 officer .
 3 A. Yes, that's right .
 4 Q. And you, of course, knew what Operation Plato was.
 5 A. I did, yes.
 6 Q. And did you know in particular that zoning was
 7 an important part of Operation Plato?
 8 A. I knew zoning was part of Plato, yes.
 9 Q. Did you give him any instruction or seek any information
 10 from him about, for example, zoning?
 11 A. No, the conversation I had with Arif in that initial
 12 call, he had very little information to offer me. And
 13 I repeatedly asked him, "Is there anything else, is
 14 there any other information", and he had nothing. So
 15 I didn't in that initial call have a conversation about
 16 that.
 17 Q. The third issue relating to that conversation: before
 18 that night, did you know Superintendent Nawaz?
 19 A. Yes, I did.
 20 Q. From what you knew, would you have expected him to have
 21 been up to the job of Night Silver in the situation into
 22 which he was placed?
 23 A. Yes, I would.
 24 Q. Did you know that he didn't know what Operation Plato
 25 was?

1 A. No.
 2 Q. When you first discovered that he didn't know what
 3 Operation Plato was, did that surprise you?
 4 A. Yes, it did.
 5 Q. Would you have expected him to have told you that he
 6 didn't know what Operation Plato was?
 7 A. Yes.
 8 Q. But as we know, he didn't do so?
 9 A. No, he didn't.
 10 Q. And I think you've probably answered this question along
 11 the way in any event, but was he able to perform his job
 12 properly that night without knowing what Operation Plato
 13 was?
 14 A. No.
 15 Q. Let's introduce some of the documents --
 16 SIR JOHN SAUNDERS: Before we do that, I'm really sorry, you
 17 were aware that some Night Silvers would have the
 18 necessary training to know what Operation Plato was, but
 19 you also knew some wouldn't?
 20 A. I'll put it like this: I would know, if you were not the
 21 TFC, you would not have a detailed understanding of
 22 Operation Plato. But given, as you've mentioned
 23 yourself, the threat assessment and given the fact that
 24 Plato had played such a major part in joint training
 25 over the previous couple of years, I would have expected

1 everybody to know what Operation Plato actually was,
 2 even if they didn't know the finite detail of it, but
 3 understand it's a response to a marauding terrorist
 4 firearms attack.
 5 SIR JOHN SAUNDERS: Okay. So knowing now the reality of the
 6 situation that some, presumably in the same position as
 7 Mr Nawaz don't know, looking back and again with the
 8 benefit of hindsight, which we have to do to an extent
 9 in this inquiry, would it have been a good idea if you'd
 10 asked him whether he knew what Plato was?
 11 A. Yes, it would have been.
 12 SIR JOHN SAUNDERS: Thank you.
 13 MR GREANEY: Fourth issue. At that time, as an ACC in
 14 Greater Manchester Police, did you keep something called
 15 a daybook?
 16 A. Yes.
 17 Q. What was a daybook?
 18 A. A daybook is a hardback bound notebook that I utilise to
 19 make notes in meetings, actions, activities in my
 20 general portfolio of responsibilities.
 21 Q. Did you also keep something called a Gold book?
 22 A. Yes, I did.
 23 Q. What was your Gold book?
 24 A. The Gold book is a separate book, a similar handbound
 25 book, that I would utilise as the duty Gold commander to

1 record meetings, discussions, incidents, activities that
 2 I'm undertaking as the Gold commander.
 3 Q. So presumably you kept that book separate from your
 4 daybook?
 5 A. Yes.
 6 Q. So you'd have a ready resource for what you'd done or
 7 been told as Gold?
 8 A. Yes, and in it are documents such as my firearms
 9 commander NDM, that type of thing.
 10 Q. And having been called by Superintendent Nawaz and
 11 before you left home, did you make some notes that night
 12 in your Gold book?
 13 A. Yes, I did.
 14 Q. Why did you make those notes rather than immediately
 15 setting off for force headquarters?
 16 A. I made the notes, firstly, because he'd woken me up so
 17 I'd literally stepped out of bed, got my notebook, took
 18 a pen, and tried to make notes of what he was saying to
 19 me as he was speaking.
 20 Q. So this isn't a note you make afterwards, it is at the
 21 time that he is speaking?
 22 A. So I am scribbling down as he is talking to me.
 23 Q. That's my misunderstanding. I'm just going to make sure
 24 that I can understand your note. {INQ029053/2}, I think
 25 is where it starts.

1 We can see about a quarter of the way down the page,
 2 there's a heading "Telephone call". Then there's
 3 presumably a phone number and the date, "22 May 2017".
 4 A. Yes.
 5 Q. Is this the note that you made as you were given
 6 information by Superintendent Nawaz?
 7 A. Yes.
 8 Q. I can read most of it, but I can't read the top line.
 9 What does that say?
 10 A. It says:
 11 "Lone male detonated vest."
 12 Q. And then, "Operation Plato called by FDO"?
 13 A. Yes.
 14 Q. "Arif Nawaz", the person making the call. What does the
 15 next line read?
 16 A. "Call out media."
 17 Q. And then the name of the artist?
 18 A. Yes.
 19 Q. "Single male, explosion."
 20 The line beneath that?
 21 A. "10 dead."
 22 Q. And then beneath that?
 23 A. "Arena MEN."
 24 Q. We'll get to "threat" in a moment. To the right-hand
 25 side it reads "Silver". What does it say under that?

1 A. "SIO investigation."
 2 Q. And then "C&C"?
 3 A. Command and control.
 4 Q. And then "threat". What were you recording here?
 5 A. In this note, Arif must have told me the threat
 6 assessment. He didn't say where that threat assessment
 7 had come from, but in terms of threat assessment,
 8 I would recognise that as being a firearms threat
 9 assessment and "public/police/armed/unarmed" as being
 10 high in terms of the threat level.
 11 Q. So a high risk to all of the persons falling into those
 12 categories?
 13 A. Yes.
 14 Q. And then as you have told us:
 15 "Arif, FHQ, Silver and Gold open"?
 16 A. Yes.
 17 Q. So just reading that, it seems as if you probably gave a
 18 direction that he was to go to force HQ.
 19 A. That would appear to be the case.
 20 Q. One thing I will just ask you about at this stage,
 21 although it is going to crop up later, is this: we can
 22 see that one of the first entries that you made was
 23 "call out media".
 24 A. Mm—hm.
 25 Q. And then indeed something you did at a very early stage

1 when you arrived at force headquarters was to approve
 2 a press release.
 3 A. Yes.
 4 Q. And members of the public might think that, as
 5 Gold commander, addressing media issues would be
 6 something that ought to be very low down on your list of
 7 priorities. So I'm going to give you an opportunity to
 8 address any concern that someone might have about that.
 9 A. So in terms of these types of incidents, what happens
 10 very quickly is information is out in the public domain,
 11 that's been part of our training both in public order
 12 and major incident training, that the need to utilise
 13 the media effectively in an incident is really
 14 important, but particularly in a case like this because
 15 it's Plato, it's the warning and form aspect of
 16 messaging and notifying the public of any information
 17 that we do have that will keep them as safe as possible
 18 is a primary objective.
 19 Equally, going back to this type of incident, and
 20 the fact in my head it's a terrorist attack, there will
 21 be lots of people worried and concerned for loved ones
 22 and the victims, so the need to have that media
 23 structure in place is really, really important.
 24 Q. So insofar as anyone might have imagined this was
 25 anything to do with the reputation of the force or

1 anything of that sort --
 2 A. Absolutely not, no. This is all about: how do I best
 3 get into a position to communicate with the public, not
 4 communicate with the media, it's not about the story,
 5 it's about loved ones, families, victims, those who have
 6 come out of the scene as well, being able to access
 7 information that will be of use either in terms of
 8 direction or support, and it links to the direction
 9 around the casualty bureau as well.
 10 Q. A very clear answer. Thank you very much.
 11 SIR JOHN SAUNDERS: You've obviously thought, or the force
 12 have thought, very carefully about the need to do that
 13 in a structured way, so no doubt the press release was
 14 prepared by a media representative at GMP?
 15 A. Yes. So Ben Ashworth was the media rep in. Ben had
 16 already sent out a tweet to say we're responding but we
 17 had no other information and it was important to put
 18 a statement out --
 19 SIR JOHN SAUNDERS: It's also very important that clearly
 20 dealing with this very important part, which
 21 I understand to be important, doesn't interfere with the
 22 very important business of saving lives.
 23 A. No, not at all.
 24 SIR JOHN SAUNDERS: That doesn't seem to be thought of
 25 in relation to the press going straight through to the

1 FDO, which we've heard of, which really does cause
 2 a problem.
 3 A. It does, yes.
 4 SIR JOHN SAUNDERS: Why hasn't that been thought about
 5 before?
 6 A. I think it is in the plans. I think Ben's
 7 responsibilities when he's first contacted are to start
 8 to take away that line of the force duty officer and
 9 then to direct the media in to a different source, and
 10 I think his original information was telling the media
 11 to contact the press office and stop ringing the FDO
 12 line. I understand that they continued to do so, and
 13 then a further statement was put out saying, "Please
 14 contact the GMP press office", and they have a media
 15 plan that kicks in on the back of that. But it doesn't
 16 take away the fact that, yes, they were still able to
 17 access the FDO line and the out-of-hours call-out.
 18 SIR JOHN SAUNDERS: People are just ringing in from all over
 19 the world and going to the FDO's line because that is
 20 the number they get. Is that still the position or have
 21 you no idea?
 22 A. As I'm not in GMP, I can't speak for GMP at this moment.
 23 I think it has been resolved --
 24 SIR JOHN SAUNDERS: We'll find out.
 25 MR HORWELL: There is evidence about a dedicated media line,

1 which I mentioned a week or two ago.
 2 A. I would say, sir, in my own force I've checked and we
 3 don't routinely give out the FDO or FOM, as we call
 4 them, we have two FOMs on duty, and they don't have
 5 access to our FOM line.
 6 SIR JOHN SAUNDERS: And never did?
 7 A. I checked that as well. I think I would probably
 8 suggest, hand on heart, that the local media in some way
 9 will have found their way into it, but I've spoken to
 10 some of our FOMs recently and they reassure me that the
 11 media don't ring on to those lines.
 12 MR GREANEY: Is that because obviously it's a bad idea that
 13 the media have the FDO number?
 14 A. It is, yes.
 15 Q. Because even if you do have a press officer who's going
 16 to eventually take that burden away, it's going to take,
 17 as in fact was the case here, that person a period of
 18 time to get in situ and start sending out those
 19 messages.
 20 A. Yes.
 21 Q. And I think you'll readily accept that this did create
 22 a real problem on the night for the FDO?
 23 A. Yes.
 24 Q. Having concluded your telephone conversation with
 25 Superintendent Nawaz at 22.54.58, what did you do? I'm

1 at paragraph 58 of your statement if that helps.
 2 A. Obviously I had to, as I say in my statement, take
 3 a minute to compose my thoughts. Obviously, that's
 4 a significant incident and a significant update that
 5 I've been given by Arif, so I was quite shocked, I have
 6 to say, for about the first minute. But I then kicked
 7 into getting on with the job and thinking about what
 8 needed to be done. I talked to, as I said previously,
 9 understanding who Ariana Grande was, I could see already
 10 that social media was escalating and there were varying
 11 reports coming in and significant coverage, which again,
 12 when I talk about the media aspect, told me again how
 13 important that element was going to be.
 14 I could already see reports from the scene, and
 15 obviously that led me to that comment earlier around the
 16 need to quickly get —
 17 Q. A little fast again, but just to be clear, this is all
 18 happening before you have left your home?
 19 A. Yes, absolutely, in the first couple of minutes after
 20 the call with Arif. So I'm thinking about that. I was
 21 thinking about Plato as well. Obviously, I understood
 22 the significance of that as a response. And obviously
 23 in my head, the FDO had called it believing this was
 24 potentially a terrorist attack, that the likelihood is
 25 firearms had been involved, and that this would — other

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1 attacks would follow because —
 2 Q. Can I ask you to pause? Because this is an issue that
 3 has arisen a number of times. You've equated what
 4 you have just said, although you did mention firearms,
 5 Plato with a terrorist attack.
 6 A. Yes.
 7 Q. In your mind at that stage, stripping away what you have
 8 learned since, was Operation Plato a tactic, plan, that
 9 was appropriate to deploy in response to any terrorist
 10 incident or only in relation to a particular type of
 11 terrorist incident?
 12 A. My training at the time told me that it would be
 13 deployed to a marauding terrorist attack involving
 14 firearms.
 15 Q. So when you were told that Plato had been declared,
 16 though Superintendent Nawaz didn't understand what that
 17 meant, you knew that it meant that there was, my phrase,
 18 a material prospect that not only had there been an
 19 explosion but also that there was a terrorist armed with
 20 a firearm and marauding, intent upon causing carnage?
 21 A. That was my belief that that would be the case, yes.
 22 Q. At that early stage before you have left home you're
 23 thinking about Plato?
 24 A. Yes.
 25 Q. We'll park that for the time being because I do want to

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1 return to Plato as a discrete topic in due course.
 2 SIR JOHN SAUNDERS: And I want to come back to your thinking
 3 at the time. We know what the definition of Plato is.
 4 But if there has been a bomb gone off, which is
 5 terrorist related or at least suspected to be terrorist
 6 related, because of recent incidents, will there not
 7 always arise a material risk that there will be
 8 a marauding firearm gunman somewhere around following it
 9 up?
 10 A. I think that's the mindset we were in because if you go
 11 back to Mumbai, that was a very clear terrorist attack
 12 in terms of the use of firearms. If you roll forward to
 13 Paris, a lot of what happened post-Paris played into
 14 firearms training. So whilst it's defined very clearly
 15 as being this, this and this, my understanding and my
 16 kind of knowledge of it in terms of incidents and
 17 methodology was that this was evolving all the time. So
 18 this could be a precursor attack and we were trained
 19 around people drawing in assets and then further attacks
 20 taking place. We knew in Paris it started with a bomb
 21 at Stade de France and then evolved into other things.
 22 So my mindset at the time was to keep a very open mind
 23 in terms of it is going to be people with guns going
 24 round, but actually we've got an explosion, Arif had
 25 told me it was somebody with a vest. To me, that meant

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1 there was a high prospect of further attacks to come.
 2 The methodology, I think, starts to vary because the
 3 training was kind of taking us down the route of things
 4 have evolved, we'd had Westminster as well, we were in
 5 a state of high alert, and things were kind of changing
 6 all the time.
 7 SIR JOHN SAUNDERS: We get the picture. Thank you.
 8 MR GREANEY: You can see the chairman's point and we are
 9 going to come on to this.
 10 Operation Plato dictates that there should be a very
 11 particular response, does it not?
 12 A. Yes.
 13 Q. And in particular, as we are going to see, where there
 14 is a hot zone, that is not a zone, even into which
 15 specialist emergency responders are going?
 16 A. Yes, as per the plan, yes.
 17 Q. That is going to have very significant consequences for
 18 casualties —
 19 A. It would if it was applied, yes.
 20 Q. — who are in that area? Whether it actually happened
 21 on the night, we're going to look at. That is what
 22 ought to happen when Plato is declared?
 23 A. Yes.
 24 Q. The point the chairman is making, that I think you're
 25 agreeing with, is that in any situation in which there

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1 was an explosion, there was, because of what had
 2 happened in Mumbai and what had happened in Paris,
 3 a material risk that it would be associated with someone
 4 else coming in with a firearm and seeking to kill
 5 people?
 6 A. Yes, or elsewhere in the city, so that was what was in
 7 my mind, yes.
 8 Q. Would it be fair, drawing all that together, to suggest
 9 that there was a risk that Plato, with those very rigid
 10 and particular consequences, might be called too
 11 readily?
 12 A. No, I don't think so. I think again training tells us
 13 that if you think you've got a Plato, declare it, which
 14 was done. I think if you look at the purpose of Plato
 15 as a response plan, it's an eminently sensible approach
 16 to coordinate and communicate and share the information
 17 with those people best placed to respond. I think
 18 JOPs 3 -- my personal view of JOPs is it's quite
 19 straightforward, it deals with the evolving picture, but
 20 allows flexibility within that. So I don't think Plato
 21 constrains activity, I think it actually should enhance
 22 the activity that takes place because you are actively
 23 putting together units of people to deal with an
 24 incident.
 25 Q. So is the problem then not the declaration, because

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1 I have fully understood your answer, but what the
 2 consequences of the declaration are? Because where
 3 there is a hot zone and casualties are already being
 4 treated, no one wants to pull out from that area --
 5 A. No.
 6 Q. -- those who are carrying out the treatment. And yet
 7 Plato dictates that that should happen, does it not?
 8 A. It does, but wasn't applied on the night, and I think
 9 that's part of -- as this evolves, because we weren't
 10 constraining activity into the scene by declaring a hot
 11 zone, it has enabled responders to be in there -- or
 12 people even to leave that scene, I think that's the
 13 issue.
 14 So I think Plato gives a framework, it enables the
 15 joint understanding of risk as opposed to, in my view,
 16 constraining the activity, because each commander can
 17 make their own assessment of that risk as long as we all
 18 understand that Plato has been called, which is
 19 obviously another issue. But we're able then to get the
 20 best capabilities and response in place. So I don't
 21 think JOPs is a problem: I think it's the application of
 22 JOPs and how it was done on the night (overspeaking).
 23 SIR JOHN SAUNDERS: It absolutely needs to be that Plato is
 24 kept under very constant and very immediate review, so
 25 as soon as it's not necessary and as soon as we know

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1 that there is not a gunman to be found there, it's
 2 called off?
 3 A. In terms of rescinding Plato ...
 4 SIR JOHN SAUNDERS: That's a requirement of JOPs, isn't it,
 5 to keep it under constant review?
 6 A. To keep it under constant review, yes --
 7 MR GREANEY: As per the refreshed guidance --
 8 A. Yes, and I think ... It's ... To rescind it, I always
 9 thought the actual rescinding of Plato was when you
 10 fundamentally had made a mistake in terms of its
 11 declaration. So it's an incident happens and it very
 12 quickly transpires that it just isn't a terrorist attack
 13 or it's something else. To rescind Plato in those
 14 circumstances, I think, was exceptionally difficult
 15 because we were in a situation where to negate the risk
 16 entirely and to be absolutely certain that nothing else
 17 was going to happen, which would have led to standing
 18 down the firearms authority because the criteria would
 19 no longer be met, and the circumstances are such that
 20 there's so much misinformation in the initial stages,
 21 being able to say, "Actually, this isn't Plato", at any
 22 point up until certainly -- I mean, my position was
 23 getting the identification of the attacker at the scene
 24 and understanding what else may evolve.
 25 As for other incidents happening around us, I think

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1 it was very difficult for me, ultimately, to say, or the
 2 TFCs when reviewing it, to say, "This isn't Plato any
 3 more because these things haven't happened". You know,
 4 this was a very, very sophisticated attack --
 5 SIR JOHN SAUNDERS: What happened was suspending Plato
 6 I think eventually, is that right, or do you not know
 7 that either?
 8 MR GREANEY: Plato standby.
 9 SIR JOHN SAUNDERS: Plato standby? I am so sorry.
 10 A. Plato standby. I actually thought that was a very
 11 pragmatic and sensible position to get to because --
 12 SIR JOHN SAUNDERS: But it doesn't actually appear in JOPs
 13 anywhere, does it?
 14 A. No, it doesn't. It's a bit like Temperer was declared
 15 the next night and we used a slightly lighter version of
 16 Temperer because we had to adapt to the circumstances
 17 that we were faced with and I think that's the same with
 18 JOPs. I thought when Mark Dexter talked of standby it
 19 made a lot of sense.
 20 MR GREANEY: That was hours later.
 21 SIR JOHN SAUNDERS: I have, as usual, butted in and taken us
 22 down a line where Mr Greaney is not going to come to for
 23 some time now.
 24 MR GREANEY: It is always helpful to focus in on issues and
 25 I did want to pick up on two things that you said along

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1 the way.
 2 First of all, in an answer you gave, you may have
 3 identified yourself one of the problems with Plato, at
 4 least as it existed then. Because I pointed out to you
 5 the rigidity of the scheme, so Plato is declared, there
 6 is a hot zone, no one is going to that hot zone apart
 7 from armed officers in order to neutralise the threat
 8 and they are not going to be treating any casualties.
 9 A. Yes.
 10 Q. And you acknowledged that that is the scheme. But you
 11 pointed out that isn't what was done that night.
 12 A. Mm—hm.
 13 Q. And you're quite right that although the FDO has told us
 14 that he considered the City Room a hot zone, he didn't
 15 want those who were treating casualties to be withdrawn,
 16 so he didn't tell anyone that Plato had been declared.
 17 A. Yes.
 18 Q. Your mindset seems to have been relatively similar. You
 19 knew that there were people treating casualties in the
 20 City Room, but you didn't want them to withdraw, did
 21 you?
 22 A. No.
 23 Q. And doesn't that illustrate, bearing in mind that an
 24 experienced FDO and an experienced Gold commander did
 25 not want the full consequences of Plato to be applied,

1 doesn't that demonstrate that there needed to have been
 2 at the time a greater degree of discretion than the
 3 strict scheme provided for?
 4 A. Yes, if that had been declared as a hot zone and it was
 5 being applied as a hot zone, I can see why that would be
 6 the case. But people were being treated in there, there
 7 were no active shooters present in that scene, and we
 8 understood that. So that application of hot zone by the
 9 definition of the plan was not being applied, and that
 10 wasn't made — if it had been made aware to me, I would
 11 have challenged that significantly to say what's
 12 happening in that scene that makes it hot there and
 13 then.
 14 SIR JOHN SAUNDERS: That's the point: we know there's no
 15 active shooter there or threat there, therefore it
 16 shouldn't be a hot zone.
 17 A. And I wasn't aware that he'd declared that a hot zone
 18 and that we had constraining activity —
 19 MR GREANEY: This is the second issue that in a moment
 20 I want to come to. I think what effectively you're
 21 saying to us is that you knew that the FDO had exercised
 22 a discretion to keep people in the City Room and you
 23 were supportive of the exercise of that discretion?
 24 A. Yes — well, in the sense of I didn't know there was
 25 a hot zone declared, if that was the case —

1 Q. Even if it was a warm zone, there ought not to have been
 2 emergency services —
 3 A. We can operate in a warm zone in different ways. There
 4 can be police officers with PPE in there and other
 5 emergency services' on—scene commanders could make
 6 a judgement as to whether people move forward as well if
 7 there's that shared understanding of the risks.
 8 Q. My understanding is that within the warm zone those who
 9 are able to operate are the specialist resources of the
 10 Fire and Rescue Service, the SRT, and the specialist
 11 resources of the Ambulance Service —
 12 A. Mm—hm.
 13 Q. — HART. You knew, didn't you, at the time — and you
 14 must understand that I'm not criticising you because it
 15 may be completely understandable why you were making the
 16 decisions you were making not to pull people out. But
 17 you knew that within the City Room there were people
 18 treating casualties who were not members of HART and who
 19 were not members of SRT. In fact, no member of SRT ever
 20 got there.
 21 A. Yes. I knew there was risk in there but I was satisfied
 22 that we didn't have an active shooter because the
 23 reports from the scene were there was nothing ongoing
 24 in the City Room that was causing an effect which meant
 25 that people could not be treated.

1 Q. What I'm asking you to accept, and it may be you won't,
 2 is what was happening was that a discretion was being
 3 exercised, which was for the good as it turned out, my
 4 description, but that was a discretion that Plato,
 5 strictly applied, didn't allow for and that was the
 6 problem with it.
 7 A. Yes.
 8 Q. Do you agree with me?
 9 A. I agree with that, yes.
 10 SIR JOHN SAUNDERS: We will have a break fairly soon,
 11 I think.
 12 MR GREANEY: I will just pick up on the second issue and
 13 then we will break.
 14 The second point arising out of what you said in
 15 answer to the chairman, the idea of a review. Certainly
 16 the refreshed guidance issued by CTPHQ — do you know
 17 what I'm talking about?
 18 A. Yes.
 19 Q. Certainly the refreshed guidance talks about a need to
 20 review Plato.
 21 A. Mm—hm.
 22 Q. When one thinks about it for a moment, the reason for
 23 that is obvious because if Plato is being applied
 24 casualties in the hot zone are not being treated, are
 25 they?

1 A. Mm.
 2 Q. So you need to review it regularly and Mr Sexton
 3 accepted that.
 4 Do you think that you had an obligation to carry out
 5 your own review from time to time of Plato as
 6 Gold commander?
 7 A. Yes.
 8 Q. And did you carry out such a review from time to time?
 9 A. I did in terms of my conversations with Mark Dexter
 10 at the scene, yes.
 11 SIR JOHN SAUNDERS: Without knowing about the hot zone?
 12 A. I didn't know about the hot zone, sir.
 13 SIR JOHN SAUNDERS: How do you review Plato without knowing
 14 that there's been a hot zone declared?
 15 A. Because I was basing my review on the information that
 16 mark was giving me a the scene as the on-scene
 17 commander, describing the fact that casualties had been
 18 evacuated and that he was treating it as a warm zone, is
 19 what he said to me ultimately at about 00.20, but this
 20 ongoing assessment of wider risk, other attackers, that
 21 type of thing. So I didn't know about the hot zone --
 22 again, I think that would have led me to a different
 23 conversation to say, "Why is this a hot zone", but
 24 we weren't treating it as a hot zone.
 25 MR GREANEY: Furthermore, the first discussion you had with

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1 Superintendent, as he now is, Dexter, was at 11.41.
 2 A. Yes.
 3 Q. So that is 54 minutes after Plato has been declared and
 4 that sounds like quite a long time to wait before
 5 reviewing that declaration; would that be fair?
 6 A. I would agree, yes. But that was the first opportunity
 7 I had to do that with somebody at the scene.
 8 MR GREANEY: Sir, you are quite right to suggest that we
 9 ought to take a break. Would now be convenient, please?
 10 SIR JOHN SAUNDERS: Okay.
 11 I think you do need to understand we're not here to
 12 criticise people and say, this person didn't do that, or
 13 anything like that, but we are needing to look
 14 critically at what happened and the decisions people
 15 made for future benefit and so we actually understand if
 16 things went wrong, what they were.
 17 Thank you.
 18 (11.15 am)
 19 (A short break)
 20 (11.32 am)
 21 MR GREANEY: We were dealing with things that you had done
 22 having spoken to Superintendent Nawaz, but before you
 23 left from home to go to force headquarters.
 24 You had explained to me earlier that one of the
 25 things it was necessary for you to do was to go online,

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1 spend a little time finding out about Ariana Grande, so
 2 that you could make a judgement about the likely profile
 3 of the audience.
 4 A. Yes.
 5 Q. Mr Cooper has invited me to draw to your attention
 6 a particular page of some handwritten notes of yours in
 7 order to see to what extent this may be relevant to
 8 an issue that we were discussing, namely whether GMP
 9 should have known ahead of time the likely audience
 10 profile for that concert. So that's where we are. I am
 11 going to ask that Mr Lopez put on the screen
 12 {INQ040516/22}.
 13 These are described as notes that you prepared ahead
 14 of a presentation.
 15 A. Yes.
 16 Q. Were they ahead of a presentation that I tried to ask
 17 you about earlier?
 18 A. Yes, they are.
 19 Q. Slide 11, and it reads "Ariana", and then the other word
 20 is?
 21 A. "Courteeners."
 22 Q. So that would be the back-up act, I suppose:
 23 "What you don't want as the Gold are lots of
 24 high-profile events, crowded places and public shows of
 25 defiance and unity in a high-threat, high-risk

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1 scenario."
 2 So I don't want to put words in your mouth, you'll
 3 tell me. Is what you're saying there really what you
 4 want when you are duty Gold is to be on a Sunday night
 5 when it's pouring down, there are no events on anywhere
 6 in Manchester, so that there is less risk of something
 7 happening that you'll have to deal with?
 8 A. That particular slide note refers to the fact that
 9 in the days that followed the attack at the
 10 Manchester Arena on Monday, 22 May, we had a series of
 11 high-profile events taking place, and this is talking to
 12 the fact that, following the attack at the arena, quite
 13 rightly, the City of Manchester and families wanted to
 14 come together in a show of unity following a terrorist
 15 attack and we saw that happen in Manchester that week.
 16 But we had equally gone to critical on the 23rd, so the
 17 explanation of this is that I was expressing to the
 18 audience the challenge of the fact that the public,
 19 quite rightly, want to come together, but we've had an
 20 incident at the arena and we are now faced with a series
 21 of high-profile events. We had the Greater Manchester
 22 Games that following weekend, the Courteeners was a big
 23 concert that was taking place that following Friday, all
 24 in the backdrop of having had a significant terrorist
 25 attack.

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1 Q. And a Champions League game, I think, as well in the
2 days that followed?
3 A. Yes, that's right, on the Wednesday night. So that note
4 talks to the challenge that that presents following an
5 incident of this nature.
6 Q. That's extremely helpful. It sounds as if this note
7 isn't relevant in the way it was thought to be relevant
8 to the point we were discussing. Is what this reveals
9 that in the period after the arena attack, there were
10 many events and GMP was keen to understand as much as it
11 could about those events, including audience profile, in
12 order to protect those who were attending?
13 A. Yes, that's correct.
14 Q. So no doubt the point Mr Cooper would invite you to
15 agree with, if he was asking these questions, would be
16 that was something you did after the arena attack,
17 it would have been sensible to have done that sort of
18 thing before the arena attack in relation to the
19 Ariana Grande concert?
20 A. Yes, I would agree.
21 Q. We're going to come on in a moment to some calls that
22 you made, both before leaving home and on leaving home,
23 but I just want to touch on something that we'll return
24 to, which is at that early stage, within the minutes of
25 concluding the telephone conversation, did you start to

1 give consideration to your strategy as Gold commander?
2 A. Yes, I did.
3 Q. Because after all, that was a critical part of your
4 role, was it not, to devise the strategy?
5 A. Yes.
6 Q. And we'll come to the note you made of it in due course.
7 I said that we would come to the schedule of audio
8 and we're going to do that next. I hope you have a copy
9 of that?
10 A. I do, yes.
11 Q. Thank you. We'll start at the first page. I'm just
12 going to work through these calls and we'll deal with
13 them as efficiently as we can.
14 So the first call that you made, just over 2 minutes
15 after you came off the phone from Superintendent Nawaz,
16 was our line 3204, timed at 22.57 hours, when you called
17 Mr Hopkins, the chief constable, and there was
18 a discussion lasting, it would seem, for 1 minute and
19 3 seconds.
20 A. Yes, that's right.
21 Q. Do you recall that call?
22 A. Yes, I do.
23 Q. What was the purpose of it?
24 A. It was twofold. Firstly, I thought it was necessary
25 that the chief constable knew what had happened at

1 a very early juncture because it was highly likely that
2 people would make contact with him anyway, so it was to
3 brief him on what had happened. Secondly, because in
4 line with my developing thoughts around a media
5 approach, it would be necessary to have what we would
6 call a talking head, and that the chief constable, given
7 the scale and nature of the attack, would be the best
8 person and best placed to deal with the media.
9 Q. And did you communicate both of those things to the
10 chief constable?
11 A. That was the discussion that we had, yes.
12 Q. Next, you made a call almost as soon as you came off the
13 phone from the chief constable to Russ Jackson, who the
14 inquiry is familiar with, Detective chief superintendent
15 as he then was, head of the North-west Counter-terrorism
16 Unit. What was the purpose of that call?
17 A. Because of the fact that I'd been informed it was
18 Operation Plato and obviously terrorism would be
19 involved, I needed to make sure that Russ was aware
20 at the earliest possibility and opportunity so he could
21 start to put in place that CT Network requirement and
22 contact.
23 Q. I don't know if you saw it, there's no particular reason
24 why you needed to, but we have heard from Neil Basu
25 about that network --

1 A. Yes.
2 Q. -- and indeed from Lucy D'Orsi. It seems from
3 lines 3331 and 3452 that you called him and then he
4 called you back and there was a connection for a total
5 period of 43 seconds.
6 A. Yes.
7 Q. Next, at 23.01 hours, again very shortly after the Russ:
8 Jackson call, you telephoned Alison Thornton and that
9 contact lasted for 17 seconds.
10 A. Yes.
11 Q. First of all, who is she and, secondly, the purpose of
12 that call, please?
13 A. Alison Thornton was my staff officer at the time, so she
14 worked with me on a daily basis, and the purpose of the
15 call was I knew that I would need a loggist once
16 I arrived at force headquarters and my request to her
17 was to attend and perform that function.
18 Q. What I think we know is that not only was she a loggist
19 but she did perform various functions for you in terms
20 of seeking out documentation and so on?
21 A. Yes.
22 Q. Because we heard from Mr Sexton that he received
23 a message from her, saying that she wanted a copy of the
24 Operation Plato plan.
25 A. Yes, because I became aware that neither her or Arif

1 knew what Operation Plato was.
 2 Q. You became aware that neither she nor Arif?
 3 A. Yes.
 4 Q. That I think is new information. What at the time was
 5 the rank of Alison Thornton?
 6 A. Sergeant.
 7 Q. Did she have any kind of background in firearms?
 8 A. Not that I was aware of, no.
 9 Q. Whatever her background, it had not informed her about
 10 Operation Plato?
 11 A. No.
 12 Q. The next call you made, our line 3819, was to
 13 John O'Hare, I think a chief superintendent at the time.
 14 A. That's right, yes.
 15 Q. What was the purpose of that call, which lasted for
 16 2 minutes and 25 seconds?
 17 A. My thinking at that point was, given the nature of
 18 Plato, terrorism, he was the only person I knew that was
 19 a specialist strategic firearms commander other than
 20 myself, and --
 21 Q. And you, of course, had only very recently qualified --
 22 A. I was occupationally competent, but had just come back
 23 from the course, and it would be useful to have that
 24 skill set available to us as the situation developed.
 25 Q. In fact, was he available in the sense of being

1 physically available to provide on the ground help?
 2 A. No, he was out of the country at the time.
 3 Q. In fact, he was out of the country in connection with
 4 his duties?
 5 A. Yes.
 6 Q. But we can see you spoke to him for a little under
 7 2.5 minutes.
 8 A. Yes.
 9 Q. Did you manage to obtain information from him that was
 10 of value to you?
 11 A. My experience with John, and he'd worked as a temporary
 12 ACC when I first arrived, was that he was very, very
 13 familiar with the multi-agency arrangements in
 14 Manchester and we discussed, relatively briefly, how
 15 that multi-agency partnership would develop in the
 16 course of this incident. I took some advice from him
 17 and he said, GM is in a good place to do this, I wish
 18 I could be there, and there was a conversation around
 19 whether he could find his way back to the UK to assist,
 20 but that was the gist of the conversation.
 21 Q. So this was a conversation that was about joint working
 22 with emergency partners?
 23 A. Yes.
 24 Q. As we have heard, you were trained in that, you had
 25 experience of it --

1 A. Yes.
 2 Q. -- you understood its importance and here you are at a
 3 very early stage taking steps to make sure that happens?
 4 A. Yes.
 5 Q. We are going to get to it in due course, but to say the
 6 least, I think you'll be able to acknowledge that there
 7 were JESIP failures that night, were there not?
 8 A. Yes.
 9 Q. And bearing in mind your background and experience,
 10 is that a matter of considerable disappointment to you?
 11 A. It is, yes.
 12 Q. Throughout that period, up to and including the call to
 13 Mr O'Hare, you were, I think, at home?
 14 A. Yes, I was.
 15 Q. Had you by that stage, before you departed home, made
 16 any attempt to get through to the FDO?
 17 A. I had, yes.
 18 Q. One attempt or more than one attempt?
 19 A. Certainly having spoken to Arif, I tried to call the
 20 FDO, but my phone didn't connect to that line. I made
 21 those calls and I made another attempt to recontact the
 22 FDO and couldn't get through and didn't connect. And
 23 then my thought process was getting to force
 24 headquarters as quickly as possible and establishing
 25 contact in that way.

1 Q. This proved to be a real problem, did it not, during the
 2 night, actually getting hold of the FDO on the FDO line?
 3 A. Yes, it did.
 4 Q. From what you have said, it sounds as if, having
 5 finished your call with Superintendent O'Hare, you set
 6 off for force headquarters; is that correct?
 7 A. It is, yes.
 8 Q. On your journey did you make and receive a call or
 9 calls?
 10 A. Yes.
 11 Q. Again, I think we can see these on the record. At
 12 line 4228, you're called by the chief constable, the
 13 contact lasts 1 minute and 7 seconds.
 14 A. Yes.
 15 Q. Do you recall what that was about?
 16 A. The first question from the chief was asking whether
 17 I had spoken to John Rouse, who worked in the Manchester
 18 equivalent of NHS England at the time, to which
 19 I replied no, and then asked if I had any further
 20 information. That was the general conversation.
 21 Q. So that call, as we can see, started at 23.05.00. So
 22 should we take it that by that stage you were on the
 23 road?
 24 A. Yes.
 25 Q. At 23.10, I think still on the road, you made the first

1 of two calls in quick succession to
 2 Superintendent Nawaz?
 3 A. Yes.
 4 Q. The first lasting, I think, 13 seconds, and the second
 5 1 minute and 50 seconds.
 6 A. Yes.
 7 Q. Again, can you recall the purpose of those calls?
 8 A. I don't recollect exactly, but my need at that time was
 9 for more information, so my contact with Arif was
 10 probably to find out more information and what had
 11 progressed since he'd initially told me at 22.52.
 12 SIR JOHN SAUNDERS: You are giving the lengths of these
 13 calls. Mr de la Poer remarked yesterday that they all
 14 appeared to start at 00, which may just be a function of
 15 the recording of times. I'm not complaining about that
 16 in any way, but are the lengths of the calls accurate,
 17 as far as we know?
 18 MR GREANEY: We'll need to check that. I hadn't heard
 19 Mr de la Poer say that, but looking at the schedule,
 20 he's right.
 21 MR HORWELL: I have sought an explanation and I haven't yet
 22 received it, but they plainly are unreliable if they are
 23 being looked at by the second, because they cannot all
 24 have started at 0 seconds as Mr de la Poer said.
 25 SIR JOHN SAUNDERS: It may have been that they are

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1 compensated for so the times are accurate.
 2 MR HORWELL: The moment I have the answer, I'll let you
 3 know.
 4 SIR JOHN SAUNDERS: Thank you.
 5 MR GREANEY: That's very helpful, Mr Horwell.
 6 I'm now properly informed, I'm sorry I wasn't
 7 before. At all events, you are describing conversations
 8 that last for a period of time, are you not?
 9 A. Yes.
 10 SIR JOHN SAUNDERS: Let's assume they're an accurate length
 11 of time until we're told to the contrary.
 12 MR GREANEY: Yes. In those calls with Superintendent Nawaz,
 13 did you receive any further information or substantial
 14 information about what had happened?
 15 A. No, other than I believe it was updates to confirm the
 16 actions that we discussed and particularly around the
 17 media and the SIO being notified, I believe that was the
 18 calls where I was told that.
 19 Q. The next is a call to you from Mark Dexter, who as we
 20 know was to become the ground-assigned tactical firearms
 21 commander. In fact, that call, if these timings are in
 22 any way accurate, occurs during the course of your
 23 discussion with Superintendent Nawaz.
 24 A. Mm—hm.
 25 Q. So can I be clear, do you recall having any conversation

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1 with Mr Dexter during your journey to force
 2 headquarters?
 3 A. Not that I recall. I believe he left me a voicemail and
 4 I also think that Arif had mentioned that Mark Dexter
 5 was travelling in as well. So I don't think I spoke
 6 directly to Mark Dexter in that call, but I had an
 7 understanding that Mark was on his way in at that time.
 8 Q. And then the final call that I'll ask you about at this
 9 stage, line 5410, a call from Chris Hill, from whom we
 10 heard yesterday, to you, timed on the schedule at
 11 23.15 hours. Do you recall whether you spoke to
 12 Chris Hill at that stage and if so the purpose of that?
 13 A. I thought I had spoken to Chris and I'm not aware what
 14 Chris' recollection is. I thought I had because
 15 I thought that was the point at which Chris and I had
 16 a discussion where he offered to come in and act as the
 17 Silver commander.
 18 Q. Can we be clear that at or about that stage, or shortly
 19 after that stage, you did have a discussion with Mr Hill
 20 and he did offer to come in and be Silver?
 21 A. Yes.
 22 Q. In that conversation what did you say to him about that
 23 proposal?
 24 A. I agreed with it. Obviously, I had worked with Chris
 25 previously in a number of operations, I knew him to be

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1 a firearms commander, and I thought his skill set and
 2 his offer was very valid and very welcome at that stage.
 3 Q. You did have a Silver at force headquarters at that
 4 time —
 5 A. Yes.
 6 Q. — you weren't aware of the flaws in his knowledge and
 7 understanding, but it seems as if you were proposing,
 8 even at that early stage, that he should be replaced.
 9 Have I understood correctly?
 10 A. Yes. I would probably suggest that that was a growing
 11 unease on my part due to the updates I was receiving
 12 from Arif that he had a clear view as to what was going
 13 on, but equally when you've got a terrorist attack,
 14 marauding, potential firearms, there is an advantage if
 15 there are other scenes going to develop that you have
 16 another qualified tactical commander who's got
 17 a firearms background in play as well.
 18 Q. I think you said, I may have misheard, that you had
 19 a developing unease as a result of the conversations you
 20 had with Superintendent Nawaz.
 21 A. I felt that in terms of tactical command and updates and
 22 command being applied to the situation that little had
 23 moved on or progressed since the original conversation.
 24 So whilst I hadn't — I don't believe I'd consciously
 25 decided at that point that Arif didn't really understand

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1 or didn't know what Plato was, but the fact that Chris
 2 had offered and I had previous experience of him as an
 3 experienced commander, that gave me reassurance that he
 4 would be able to come in and apply the command and
 5 control needed.
 6 Q. Again, I have no doubt you're being careful and fair in
 7 what you're saying, but it sounds as if what was
 8 happening was that, even at that early stage, as you're
 9 driving to force headquarters, you were developing
 10 a sense that Superintendent Nawaz was not the right man
 11 for this job in these circumstances?
 12 A. Yes, and when I operate as Gold, I'm not used to,
 13 because commanders evolve and learn and gain experience
 14 over time, but I would expect to be briefed and given
 15 information that was of use to me, using the NDM, but
 16 being much more proactive in providing information
 17 rather than asking things such as, "What do you want me
 18 to do", so you know, you get a sense of somebody's
 19 comfort zone when you are dealing with them, especially
 20 at the early stages of a major incident.
 21 Q. Yes, I'm certain you do. I'm not for a moment
 22 suggesting that this is any criticism of you at all, it
 23 can't be logically, but in the result, I think it's the
 24 position that Superintendent Hill arrived at force
 25 headquarters at about midnight to replace

1 Superintendent Nawaz. The upshot therefore is that for
 2 a prolonged period, you did not have available to you a
 3 Silver who was qualified and equipped to the extent that
 4 you were entitled to expect?
 5 A. Yes.
 6 Q. Obviously bearing in mind where you now work, you live
 7 somewhere very different, but nonetheless I'm not going
 8 to identify where you were living at the time. You
 9 weren't very far away from force headquarters, were you?
 10 A. No.
 11 Q. In fact, the distance was just under 5 miles?
 12 A. That's right, yes.
 13 Q. As a result, you believe that you arrived at force
 14 headquarters at about 11.15, and entered the command
 15 room at about 11.20?
 16 A. Yes.
 17 Q. I'm going to get to what happened once you were in the
 18 command suite in a moment, but first, as you know,
 19 I need to ask you about the evidence of retired
 20 Inspector Andrea Bradbury of Lancashire Police. Did
 21 you have a chance to watch her evidence?
 22 A. Yes.
 23 Q. And have you had a chance to have a look at the
 24 transcript?
 25 A. Yes.

1 Q. I'm going to put it on the screen and then seek your
 2 views about it. It's not the most important case in the
 3 world, but it is something which has arisen and that you
 4 ought to have a chance to comment upon.
 5 This is the transcript for Day 89, internal page 143
 6 {Day89/143:21}, first of all. Towards the bottom of the
 7 page:
 8 "Question: I next want to ask you about what
 9 happened when you arrived at force headquarters.
 10 Could you describe in your own words what you did and
 11 what happened?"
 12 She then described going to the gatehouse and having
 13 a discussion with a civilian who was ex-military.
 14 SIR JOHN SAUNDERS: I think we need to turn over the page,
 15 thank you.
 16 MR GREANEY: Thank you.
 17 And having a discussion with the gentleman at the
 18 gatehouse, who told her that she smelt of explosive:
 19 "Question: As it happened, did someone else turn up
 20 while you were at the gatehouse?"
 21 "Answer: Yes, I was getting the message someone's
 22 coming to see you and I said, don't -- 'I don't want
 23 them to come and see me, just put someone on the phone,
 24 just put me on to a boss now, I need to speak to a boss
 25 now and tell them to formulate that response'. We went

1 round in circles, then he got busy and the buzzer went
 2 at the door, so I hobbled over to the door and I looked
 3 down and all I had was a woman shoving a warrant card at
 4 me and saying, 'I'm Gold'.
 5 "Question: This is a female police officer?
 6 "Answer: Yes, and not one I recognised.
 7 "Question: And she was saying she was Gold?
 8 "Answer: Yes.
 9 "Question: And when she said Gold, did you
 10 understand that in terms of a command structure?
 11 "Answer: Absolutely. Absolutely.
 12 "Question: Did you tell her a little about your own
 13 background?
 14 "Answer: I just basically screamed at her."
 15 And then she indicates what she gave by way of
 16 information, which was to some extent a situation report
 17 about what she had seen at the arena:
 18 "Question: Can I just make sure we've understood
 19 a number of things. First, would it have been obvious
 20 to the officer to whom you spoke that you had first-hand
 21 information from the scene?
 22 "Answer: Absolutely.
 23 "Question: Were you invited into force headquarters
 24 to provide further information?
 25 "Answer: No. If I'm being totally honest and

1 frank -- and that's how I've been brought up, to be
 2 honest and frank -- she looked like a rabbit in the
 3 headlights and I was the one that was injured."
 4 Then she confirms that it probably wouldn't have
 5 been obvious that she was injured.
 6 I don't know what your reaction was when you saw
 7 that evidence, but do you agree that retired
 8 Inspector Bradbury seems to be describing you?
 9 A. She does, yes.
 10 Q. Do you accept -- first of all, do you remember seeing
 11 her there?
 12 A. No.
 13 Q. Do you have any recollection of a woman at the
 14 gatehouse, screaming the sort of information she says
 15 she screamed?
 16 A. No. I didn't have any conversation with anyone on my
 17 way into headquarters.
 18 Q. You have given there a very straightforward answer. Let
 19 me make sure I've understood it. There are obviously
 20 a number of possibilities within your answer. One
 21 is that the discussion did occur but not in the form
 22 that it was described by Inspector Bradbury and/or that
 23 you can't recall it, and secondly that you remember full
 24 well what happened when you arrived at police
 25 headquarters and you had no discussion of that sort with

1 anybody.
 2 A. I do remember arriving at force headquarters, and I'm
 3 not disputing that Ms Bradbury's account and
 4 recollection of what happened at the gatehouse is what
 5 she says, but that conversation did not take place with
 6 me. I had let myself into force headquarters. As
 7 I always do, with my pass. I arrived on blues and twos
 8 and went straight through. Having read and re-read what
 9 Ms Bradbury said, if I was spoken to by a member of the
 10 public at the gatehouse, telling me that she had been
 11 the victim of this attack, I would have done something
 12 far more than leave her outside, I would have done
 13 something very positive to support her and help her.
 14 That's a very detailed account she's provided in terms
 15 of her experience and that would have been invaluable
 16 information. It just was not me that she spoke to.
 17 Q. That's very clear. I hope you understand why I felt it
 18 was important to give you an opportunity to give your
 19 evidence.
 20 One of the things you said along the way of that
 21 answer is that if that information had been provided to
 22 you by someone who had obviously been there and had
 23 a background in policing, and indeed in
 24 counter-terrorism policing, she would have provided
 25 a source of situational awareness?

1 A. Mm--hm.
 2 Q. I'm going to leave that there.
 3 Once in the command suite, did you have further
 4 telephone conversations? I'm back at the schedule, I'm
 5 at line 6491, and a call timed at 23.26, which on your
 6 evidence would be once you're in the command suite.
 7 A. Yes.
 8 Q. It's the longest call that you've had so far, if the
 9 timings are accurate, nearly 3.5 minutes, and it's you
 10 calling the chief constable. Do you remember that call?
 11 A. Yes.
 12 Q. The purpose of it was?
 13 A. Again, to give him a further update. I think our
 14 original conversation was around, "Keep me informed".
 15 I knew that Ian Hopkins was making his way in, and this
 16 was to update him as to the position once I'd arrived at
 17 force headquarters. I believe it was to also discuss
 18 with him what I was doing in terms of setting up
 19 structures, where things were taking place, and that
 20 I was gathering people together in a command function
 21 at the FCM.
 22 Q. Then there are two contacts that I think we can probably
 23 pass over. First of all, an attempted call by
 24 Mr Pilling to you. Then at some stage, a text message
 25 from Chris Hill to you.

1 A. Yes.
 2 Q. Do you recall the text message?
 3 A. I don't, no. I would be guessing it would be about the
 4 casualty bureau or time of arrival, but I don't remember
 5 what it said.
 6 Q. You're now in the -- is the right description command
 7 room or command suite?
 8 A. Yes, either.
 9 Q. Your Gold book indicates that at that stage, you
 10 received a briefing from Superintendent Nawaz; have
 11 I understood correctly?
 12 A. Yes.
 13 Q. We'll look at that on the screen. It's {INQ029053/3}.
 14 Is that headed "Initial brief, 11.20 pm"?
 15 A. Yes.
 16 Q. So is this one of things which enables us to be
 17 confident that by 11.20, you are within the command
 18 suite?
 19 A. Yes.
 20 Q. "Arif Nawaz [you give the FWIN number]. Explosion
 21 Manchester Arena in foyer. FWIN dozens of calls."
 22 Then an entry:
 23 "BTP/NWAS."
 24 What does that mean?
 25 A. These are me taking notes as Arif is talking to me, so

1 I'll have written "BTP/NWAS" as being at scene.
 2 Q. As will be obvious, there is no reference there to the
 3 Fire and Rescue Service.
 4 A. Mm—hm.
 5 Q. What conclusion should we draw from the absence of such
 6 a reference, if any?
 7 A. That the briefing I was given by Arif was I'd written
 8 down.
 9 Q. So you were not told at that stage that Fire and Rescue
 10 Service were present?
 11 A. No, were not present.
 12 Q. And indeed that would, no doubt, be because they weren't
 13 present.
 14 Then "Radio transmission". What does that mean?
 15 "Radio transmission — suicide vest. Explosives
 16 strapped to him."
 17 A. I can't say why I have written "Radio transmission", but
 18 again this is Arif briefing me, so I will be writing
 19 down the things that he's saying to me and I'd be
 20 guessing if I was to say that that's suicide vest
 21 explosives is a result of a radio transmission, but I'll
 22 have been writing as he was talking.
 23 Q. When you're doing this, obviously there's a huge amount
 24 going on —
 25 A. Yes.

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1 Q. — which we can all understand and you've got a really
 2 very important job. Are you just trying to capture the
 3 essence of what he's saying to you?
 4 A. Yes.
 5 Q. "Operation Plato called."
 6 So he's referred to that again. Then:
 7 "Denise Walsh, deputy SIO, en route."
 8 A. "Duty SIO."
 9 It's:
 10 "Denise Worth, duty SIO, en route."
 11 Q. Sorry:
 12 "Press office."
 13 So is that an indication that the press office have
 14 been contacted?
 15 A. Yes.
 16 Q. Then "NWS" with a dash alongside it. What does that
 17 indicate?
 18 A. That NWS are present and aware.
 19 Q. "CT aware."
 20 So that's a reference to North—west
 21 Counter—terrorism Unit; is that right?
 22 A. Yes.
 23 Q. And then:
 24 "Ground commander, Mark Dexter"?
 25 A. Yes.

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1 Q. Did you have an understanding of what that meant, ground
 2 commander, in the context of what you were dealing with?
 3 A. Yes.
 4 Q. What to your mind at that stage did it mean?
 5 A. It meant that Mark Dexter was attending as the
 6 ground—assigned tactical firearms commander or what we'd
 7 refer to as the police on—scene commander.
 8 Q. And he was someone known to you; is that correct?
 9 A. Yes.
 10 Q. I can't remember if you told us earlier, but he had been
 11 on the same specialist strategic firearms course as you?
 12 A. He was, yes.
 13 Q. Over the page to {INQ029053/4}, please, Mr Lopez. Is
 14 this part of the same briefing that you received from
 15 Arif Nawaz?
 16 A. No, I think as the notebook progresses, when I speak to
 17 a different person, I would probably write on
 18 a different page, so I think this was probably the
 19 conversation between myself and Ben Ashworth when he was
 20 developing the press release, at 23.45.
 21 Q. Which goes out at 23.45?
 22 A. Yes.
 23 Q. And I think, looking at other entries in your book, that
 24 this must have occurred, this discussion, before 11.41?
 25 A. Yes.

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1 Q. And the reason I say that is because when we go, as
 2 we will in a moment, but not now, Mr Lopez, to
 3 {INQ029053/5}, we see reference — we see the content of
 4 a discussion that you had with —
 5 A. Mark Dexter, yes.
 6 Q. We won't read through all of this, but one of the things
 7 that is written is:
 8 "NWS Tactical."
 9 Do you see that?
 10 A. Yes.
 11 Q. What should we understand from that?
 12 A. The NWS tactical commander was in the room with us, so
 13 that is possibly a reference to the conversation with
 14 Annemarie Rooney or Annemarie Rooney being present when
 15 Arif was briefing.
 16 Q. The NWS Silver?
 17 A. Mm—hm.
 18 Q. And was she someone with whom you had discussions that
 19 night?
 20 A. I have a recollection of arriving with Annemarie and
 21 a conversation taking place very early on when there was
 22 probably still just myself and Arif in the room, so one
 23 of the first conversations would have been with
 24 Annemarie, yes.
 25 Q. Under that "Explosion", and then beneath that, "No

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1 gunshots".
2 A. Mm—hm.
3 Q. And from where did the information "no gunshots" come
4 and what did you understand from it?
5 A. So my recollection of this is in Arif's briefing, and
6 please bear in mind that the note I took is not
7 comprehensive or kind of verbatim.
8 Q. Is this the 11.20 briefing you're talking about?
9 A. Yes. Arif, in my head, had got some information from
10 the log and he was using that to brief, so there was
11 a lot of discussion in the room and information being
12 shared around it's an explosion, there's gunshots,
13 there's not gunshots. I think that is particularly
14 a conversation with Annemarie where Arif briefed us and
15 my recollection is I offered to Annemarie Rooney the
16 fact that there was no active shooter in the scene at
17 that time. That was my — because that was my
18 understanding of what was happening.
19 Q. So it seems to follow from that that before 11.41, you
20 were aware that there was no active shooter at the
21 scene?
22 A. Yes.
23 Q. As you're obviously aware, Annemarie Rooney's
24 recollection is that she was told, both by you and by
25 Superintendent Nawaz, that there was no gunman.

1 A. Yes.
2 Q. And that as a result, she was surprised when later she
3 found out that Operation Plato had been declared.
4 A. Yes and I'm aware of that. My response to that would be
5 that bearing in —
6 SIR JOHN SAUNDERS: Sorry, when you say you're aware of
7 that, are you aware subsequently of that or were you
8 aware at the time?
9 A. I'm aware subsequently, sir.
10 SIR JOHN SAUNDERS: We just need to make that clear.
11 A. As I believed that we had obviously declared Plato and
12 notified fire and ambulance, my conversation with
13 Annemarie Rooney in that context, bearing in mind I'd
14 just arrived, was to reassure her as the tactical
15 commander that there was no active shooting taking place
16 in the arena at that stage. Because as somebody who
17 would have staff in the arena myself, it's a vital piece
18 of information in terms of that reassurance that her
19 staff were not being attacked at that point. So that
20 was the purpose of my conversation with her.
21 Q. So you don't dispute that you had such a conversation
22 with her?
23 A. No, I don't.
24 Q. I don't suppose you're in a position to challenge her
25 suggestion that she didn't know at that stage, or indeed

1 until later, that Plato had been declared?
2 A. I was having the conversation on the premise that she
3 knew that this was Operation Plato.
4 Q. That I have understood, and I am coming to that in one
5 moment, but it would seem from what you said that you
6 were not saying to her, perhaps for good reason,
7 "Operation Plato has been declared, but there is no
8 gunman", you didn't say anything about Plato?
9 A. I didn't mention Plato. My point to her was: there is
10 no active shooter in that scene.
11 Q. The reason why you didn't consider it was necessary to
12 say to her, or perhaps to anyone in the command suite,
13 that Operation Plato had been declared was because you
14 assumed that the FDO would have informed your emergency
15 service partners?
16 A. Yes.
17 Q. Because after all, that was an important responsibility
18 that rested upon him?
19 A. Yes.
20 Q. Was the fact that there was no active shooter at the
21 scene, by which I mean the City Room, an indication that
22 the City Room was not a hot zone?
23 A. Yes.
24 Q. Was it an indication that it was not even a warm zone?
25 A. Not to me, no, because this is one piece of information

1 and there was other information in that room and being
2 discussed, and other incidents ongoing. So in terms of
3 it being a warm zone, I believed that we'd had an
4 attack, there was reports of gunshots and gunshot
5 wounds, I didn't think it was a hot zone on the basis
6 that I didn't believe there was an active shooter in
7 there, and that this was a warm zone where we couldn't
8 declare it safe or say that people would not return to
9 it —
10 Q. I see.
11 A. — and that there weren't other secondary devices or
12 attackers in that vicinity. That was the position
13 we were in at that stage.
14 Q. So your view, not hot but warm, therefore an area in
15 which, even on a strict application of Plato, specialist
16 resources could treat casualties?
17 A. Yes.
18 Q. And we've already discussed the fact that, as a matter
19 of discretion, others might go in there on your view in
20 any event.
21 Did you discuss with Annemarie Rooney, or indeed
22 anyone within the command suite, the issue of zoning
23 within the arena?
24 A. No.
25 Q. At any stage?

1 A. In the command suite?
 2 Q. In the command suite. I'm going to come on to Mr Dexter
 3 in due course, but in the command suite.
 4 A. Not that I recall. I think my conversations were with
 5 Mark Dexter in response to what was happening at the
 6 scene at the arena.
 7 Q. There is a discussion with Mr Dexter and we'll come on
 8 to that --
 9 SIR JOHN SAUNDERS: I find it somewhat odd, no doubt
 10 it isn't, but the main part of your strategy is saving
 11 life.
 12 A. Mm--hm.
 13 SIR JOHN SAUNDERS: Plato and zoning is absolutely critical
 14 to that?
 15 A. Plato response and the tri-service element. Zoning, we
 16 had never applied before, so -- I'm sure zoning is
 17 critical to that, and especially because we knew that
 18 people were already being treated at the scene.
 19 SIR JOHN SAUNDERS: I find it therefore, in those
 20 circumstances, perhaps odd -- and tell me if it isn't --
 21 that Plato is never mentioned in the command suite, so
 22 Annemarie Rooney would hear it. And also zoning or
 23 what's hot and what's warm were never talked about.
 24 A. Not in those early stages from me to the tactical
 25 commander from NWAS. I was working on the assumption

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1 and bearing in mind I'm trying to get to grips with
 2 what's happening, that NWAS knew it was Plato, so they
 3 would understand, she was the tactical commander for
 4 NWAS, she had contact directly with her scene
 5 commanders, and at the scene the application of zoning
 6 and the discussions that would be taking place would be
 7 being driven by the police on-scene commander and the
 8 NWAS tactical commander and preferably the GMFRS
 9 tactical commander. So I don't think it's unusual in
 10 the early circumstances of that force command module for
 11 us not to be discussing it, whereas as the SFC I'd be
 12 discussing that with Mark Dexter.
 13 If I'd thought for a second that there was a gap in
 14 information and knowledge and understanding, I would
 15 have sought to address that.
 16 SIR JOHN SAUNDERS: So Silver deals with the tactics. You
 17 have given them a strategy to save life.
 18 A. Yes.
 19 SIR JOHN SAUNDERS: The tactics are, from NWAS' point of
 20 view, when can we get paramedics into the place where
 21 the injuries actually are?
 22 A. Mm--hm.
 23 SIR JOHN SAUNDERS: Critical to them?
 24 A. Yes.
 25 SIR JOHN SAUNDERS: But it sounds to me like there was just

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1 no discussion in the command suite about that.
 2 A. There was no informed conversation because the
 3 information was so difficult to understand. In my head,
 4 the response to the arena in the initial stages was very
 5 much a bottom-up approach, it was happening at the scene
 6 and it was evolving from the scene, so the people with
 7 the best decision-making capability and the most
 8 relevant information as to whether they'd applied zones
 9 or otherwise, but what was happening at the scene that
 10 would allow people to get into the actual area to deal
 11 with the casualties was there. I could have applied my
 12 limited understanding and made assumptions that
 13 I thought I was not in a position to make because
 14 I would then have applied something to a situation that
 15 I couldn't assess.
 16 SIR JOHN SAUNDERS: So in the command suite what you're
 17 actually all saying is: on the ground, they know what's
 18 going on, they've got -- we just have to leave it to
 19 them?
 20 A. Leave it to them whilst you start to understand what's
 21 going on and also that broader kind of understanding of
 22 what else needs to be done. But the there--and--then
 23 situation needs to be addressed by those who are
 24 physically present at the scene and they understand what
 25 should be done, and then seek resources, seek an

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1 understanding, and then, when we're able to, step back
 2 from it.
 3 SIR JOHN SAUNDERS: How long does this early stage of
 4 getting to grips with it, getting to realise what's
 5 going on so we can get to a top-down situation rather
 6 than a bottom-up situation --
 7 A. In a spontaneous attack like this, and this is the only
 8 experience I've had of this --
 9 SIR JOHN SAUNDERS: Just tell me how long it took for you on
 10 this incident.
 11 A. For me to be comfortable with where we're at, probably
 12 until about midnight, because then I had tactical
 13 firearms commanders who'd taken handovers from the ITFC,
 14 had a ground-assigned tactical firearms commander,
 15 police on-scene commander at the scene from 11.20. It
 16 took some time to get that sense and understanding,
 17 otherwise I'd have been assuming or presuming and making
 18 decisions which could have been fundamentally wrong.
 19 SIR JOHN SAUNDERS: By 12 o'clock, all the injured who are
 20 capable of being removed from the City Room have been
 21 removed.
 22 MR GREANEY: That's correct, 20 minutes earlier.
 23 SIR JOHN SAUNDERS: So when you take top-down control, or
 24 are in a position to do that, you're then dealing with
 25 people being removed from the casualty clearing station?

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1 A. Yes, the CCP, yes.
 2 SIR JOHN SAUNDERS: So your control room had no part
 3 whatsoever in getting people out of the hot zone? I'm
 4 not saying that's wrong, because you're telling me it
 5 has to be bottom-up, you have to just leave it to them.
 6 A. I don't think there was any direction or activity that
 7 would have come from the FCM that would have -- in that
 8 very initial stage (inaudible: distorted) evacuation
 9 made any difference to what was happening in that scene.
 10 MR GREANEY: You say the very initial stage, but the
 11 practical reality is by midnight the golden hour was
 12 long gone, was it not?
 13 A. Yes.
 14 Q. And, as the chairman has pointed out, the last casualty
 15 who was capable of being treated had been removed?
 16 A. Yes.
 17 Q. Which, to use a phrase I have used sometimes, sounds
 18 less than ideal?
 19 A. It's less than ideal, but the reality is in spontaneous
 20 situations the bulk of the activity in the initial
 21 response phase will be undertaken by those first
 22 responders going into the scene.
 23 SIR JOHN SAUNDERS: So doesn't it make it even more
 24 important to get senior commanders down to the scene
 25 where they can actually have some effect?

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1 MR GREANEY: Or to the FCP?
 2 A. It does in the sense -- and you're right, sir, having
 3 that on-scene commander is an important function, and
 4 under JOPs that FCP and that joint understanding is
 5 necessary. But it will always take time to happen.
 6 You're always going to be left in a position, I believe,
 7 in a spontaneous response, such as this was, that you're
 8 reliant on your sergeants and your inspectors and those
 9 people already on the ground to make some of those
 10 assessments and judgements as to what's best to do.
 11 Getting scene command in is always going to take
 12 time and for them to be effective what you are always
 13 seeking is -- somebody else is having to brief and give
 14 that information, which slows the process down
 15 significantly.
 16 SIR JOHN SAUNDERS: But without it, do you actually get
 17 joint command at the scene, people actually
 18 coordinating, talking to each other?
 19 A. Again, I think a police on-scene commander should be
 20 identified and then Mark Dexter replaces that police
 21 on-scene commander. The problem is that nobody wants to
 22 undertake the function of on-scene commander and stand
 23 back because you, naturally, as everyone did, want to
 24 get on with the job, which Mike Smith did fantastically.
 25 But if Dale had said, "Mike, you are the on-scene

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1 commander, I need you to stand back and give me an
 2 assessment and understanding", I think Mike said it
 3 himself, he would not really think that was his role.
 4 But somebody has to do that, because otherwise how do
 5 the three emergency services come together at the scene
 6 in the very early stages --
 7 SIR JOHN SAUNDERS: I read in Kerslake that this all worked
 8 very well with Mr Smith being in there because he had
 9 a constable who was communicating with other commanders.
 10 Really? I'm not sure we've heard from a constable who
 11 was actually communicating with other commanders on
 12 scene or indeed from Inspector Smith. I just wondered
 13 where that came from.
 14 A. I don't know, sir. I think the Bronze role at the scene
 15 is the coordination role from the police and that's the
 16 way it happens --
 17 SIR JOHN SAUNDERS: Inspector Smith, perfectly
 18 understandably, didn't actually fulfil that role.
 19 A. No, he saw his role as being getting in there and
 20 getting on with it (overspeaking).
 21 SIR JOHN SAUNDERS: -- it needed somebody else need to be
 22 doing it?
 23 A. Sorry, sir, you were saying something.
 24 SIR JOHN SAUNDERS: I said it needed somebody else to be
 25 doing it.

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1 A. It did. It needed, in the very first minutes,
 2 identification of a commander who was sent to the scene,
 3 who will form that FCP and the emergency services
 4 co-locate and say, "Right, what's happening", and that's
 5 the issue.
 6 SIR JOHN SAUNDERS: Sorry if all this is very general, but
 7 the first thing we were told by the FDO is actually what
 8 you need is the RVP. The RVP is where people meet and
 9 discuss, then they get the FCP, and then -- but this
 10 thing -- didn't it fail from the outset because there
 11 was no RVP point that anybody went to? Sorry, all going
 12 together.
 13 A. Unless the officers have turned up at the scene and
 14 there was somebody with a gun there, I think they would
 15 have then withdrawn and firearms command would have
 16 said, "That is a hot zone", and people would have taken
 17 cover, they would have directed people away from that
 18 threat. I think if you then -- we all know we have to
 19 put in place RVPs for lots of operations but that's
 20 a platform from which you push your resources forward,
 21 as we know. This was a situation in the City Room where
 22 you already had BTP, you already had members of the
 23 public, and families trying to deal with a horrendous
 24 situation. Creating an RVP and moving forward from
 25 there -- whereas the best thing, in my logical head, is

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1 to get in there, look and see what's going on, and deal
 2 with that.
 3 But then once you've dealt with it as the Bronze --
 4 and this is no criticism of Mike at all -- somebody had
 5 to step out of there and say: right, we need to get NWAS
 6 in quickly, we need fire here, what is missing, what can
 7 we do to best deal with that situation? I don't think
 8 in reality in a spontaneous attack you're always going
 9 to have that initial response into the scene, but it's
 10 getting control of that. Sending a tactical commander
 11 down there will take time, so in effect, probably what
 12 I'm saying to you, sir, is you're always going to get
 13 that response from those front line staff and we need to
 14 make sure those front line staff are fully equipped and
 15 understand that role and function at the scene for us to
 16 be more effective. I'm not criticising at all what was
 17 done because I thought he did a brilliant job.
 18 That's -- otherwise it's slow command that's coming
 19 on the back of it who all need information, who need
 20 briefing, and it just slows it down.
 21 MR GREANEY: I'm going to come back in a moment to where
 22 this all started, which was zones, but what I have taken
 23 from what you said is that there just wasn't tactical
 24 grip at this scene. There wasn't grip by Silver at this
 25 scene for far, far too long.

1 A. There needed to be more understanding through tactical
 2 as to what was happening at the scene and that goes back
 3 to my view that as this developed, the need for me to
 4 have more information, that information vacuum needed to
 5 be closed down by tactical. At the scene though, you've
 6 got your on-scene commander arriving, but that's not
 7 until 23.20, so accepting that, but even if Arif --
 8 Q. And, as you will appreciate, there is an issue about
 9 when you say on-scene commander, you're referring to
 10 Mr Dexter, there is an issue about whether he was
 11 commanding all of those there, both armed and unarmed,
 12 or just the armed resources. So --
 13 A. The role of on-scene commander is clear in JOPs. It's
 14 a police on-scene commander and you will have -- because
 15 in firearms threats in your --
 16 SIR JOHN SAUNDERS: When you're saying, "It's clear in
 17 JOPs", what is clear in JOPs? That he is the on-scene
 18 commander for everybody, armed and unarmed?
 19 A. Yes, that's my understanding and interpretation of JOPs.
 20 SIR JOHN SAUNDERS: We've had about three different accounts
 21 of this so far from police officers who know.
 22 A. Again, maybe it is my interpretation, but logically, if
 23 you are the police on-scene commander in an incident
 24 where we've deployed huge amounts of firearms officers,
 25 in your threat assessment and working strategy, even

1 from a firearms perspective, within your working
 2 strategy maximising the safety of unarmed responders is
 3 always in your strategy and you do that by utilising
 4 your commanders at the scene to do that or you brief
 5 staff, et cetera.
 6 I've heard Dale's evidence as well because he
 7 separated out his role as ITFC and his role as the force
 8 duty officer and I think there is a problem in our
 9 understanding and interpretation of JOPs because, in my
 10 view, the role is all-encompassing. It's: don't just
 11 deal with the firearms assets, deal with the other
 12 emergency services and bring it together. The
 13 considerations I have had on many reflections since this
 14 is that the firearms commander is best placed to
 15 understand the threat and risk and then apply the safe
 16 principles or apply mitigation and control for all
 17 people in the vicinity of that scene, all people we
 18 identify in the strategy.
 19 If you've got an unarmed tactical in there as well
 20 there's a risk that you've got cross-command issues, no
 21 command protocols set, and who is assessing the risk,
 22 who's got that overall understanding of exactly what's
 23 happening? The information has to be assessed and some
 24 of it's fact and assumption. Does that make sense?
 25 SIR JOHN SAUNDERS: I've got the point, thank you.

1 MR GREANEY: A couple of things to pick up. First of all,
 2 as you'll appreciate from what the chair has said and
 3 indeed from your own researches, I'm sure there most
 4 certainly has not been universal support for the
 5 proposition that Chief Inspector Dexter was in charge of
 6 unarmed assets as well as armed assets. But one thing
 7 that has emerged is that if he was to be in charge of
 8 both armed and unarmed, someone ought to have told him
 9 that that was his role. Did you tell him that he was in
 10 charge of both armed and unarmed or did you just assume
 11 that he would take upon himself that responsibility?
 12 A. I didn't and perhaps I should have made his role clear
 13 and maybe that's something that, reflecting on it,
 14 I should seek to do if I'm ever in this situation again,
 15 to give absolute clarity. As I say, the very fact --
 16 I'll take it two ways.
 17 Firstly, my belief is the role is everything and
 18 that was my understanding in terms of JOPs; that's why
 19 it's called police on-scene commander. Secondly, the
 20 updates and conversations I was having with Mark Dexter
 21 at the scene led me to believe that he understood his
 22 role was more broad than that because he identified
 23 an FCP, he made requests of me around transport of
 24 casualties, explosive dogs, all those kind of things.
 25 So he was having those conversations, which made me

1 think he was thinking broadly about the issues.
 2 Q. I understand. But then there may therefore have been
 3 something of a breakdown in communication. You assumed
 4 that he was doing one thing (overspeaking) --
 5 A. It comes down to our training and our understanding
 6 of -- if we both read the same document or plan, what's
 7 our individual interpretation of that, given the wording
 8 because then ground--assigned is used in some -- the
 9 ground--assigned tactical firearms commander could lead
 10 the TFC to believe that's their role whereas the use of
 11 police on--scene commander, in my view, when I read that,
 12 is much more broad.
 13 Q. That's your account and obviously Mr Dexter will give
 14 his account and no doubt others in due course.
 15 Secondly, even assuming for the moment that
 16 Mr Dexter was the person to take tactical grip on this
 17 situation, he arrived at 11.23. That's the time he's
 18 outside the station. I'm not for a moment criticising
 19 him for the period it took him to get there, after all
 20 he volunteered to go. Isn't it reasonable to suggest
 21 that for the person, even on your view of events, who
 22 was going to take tactical grip to not arrive until
 23 11.23 is simply far too late?
 24 Shall I develop that? What I mean is what was
 25 needed was for a Silver commander to get to the FCP or

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1 the scene really very quickly indeed, to get situational
 2 awareness, to speak to the other commanders, and to
 3 decide who was going to do what.
 4 A. I think there was a need for somebody at the scene to be
 5 the police on--scene commander. Did that need to be
 6 a tactical commander? Not necessarily because again, if
 7 for example Superintendent Nawaz had been many, many
 8 miles away, he wouldn't have arrived for some time.
 9 I think the necessity is for somebody at the scene to
 10 have been identified and we had very competent
 11 inspectors who can perform that function and are more
 12 likely to arrive beforehand.
 13 SIR JOHN SAUNDERS: Perhaps it shouldn't be rank dependent?
 14 A. Yes, it's functional.
 15 SIR JOHN SAUNDERS: So there are a number of inspectors
 16 there pretty quickly. Whether you call it tactical or
 17 on--scene commander, you actually need somebody who's not
 18 in Inspector Smith's position, who's actually dealing
 19 with the casualties, you need someone who is standing
 20 back and coordinating with other people?
 21 A. Yes. And that could be for Silver. But in the context
 22 of this, was he the most appropriate person to go to the
 23 scene? I didn't think so (overspeaking) --
 24 SIR JOHN SAUNDERS: Let's forget about that for the moment.
 25 So there are inspectors on the scene. When you got

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1 there, did you identify whether there was someone, an
 2 inspector there, who was in a position to be the
 3 on--scene commander?
 4 A. I was aware that Mike Smith and Lee Cooklynn were both
 5 at the scene as Bronze commanders.
 6 MR GREANEY: I said that we'd just come back very briefly to
 7 where this particular discussion started and it was
 8 zoning. As you fairly accepted, there was no discussion
 9 about zoning --
 10 A. No.
 11 Q. -- within the command suite. But, as I think you'll
 12 know, it goes well beyond that, because the FDO never
 13 said a word about zoning so far as the evidence reveals.
 14 And actually, at the scene, at the arena,
 15 Constable Richardson has a recollection that he
 16 broadcast a message, but that can't be heard in any of
 17 the recordings. Leaving that on one side for a moment,
 18 no one else is talking about zoning until much later on.
 19 Chief Inspector Dexter starts to discuss it in what
 20 might be thought less than satisfactory terms.
 21 So really, no one is talking about zoning, wherever
 22 they are, and yet zoning is such an important part of
 23 Plato, do you agree?
 24 A. In Plato it is highlighted as being important, yes.
 25 Q. Do you have any insight for us into why it was that

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1 no one seems to have been treating zoning seriously that
 2 night?
 3 A. My understanding would be on the basis that people were
 4 already in that scene dealing with casualties, that
 5 zoning wasn't applied in its truest sense, and that
 6 assessment wasn't done at the outset.
 7 Q. That's a very clear and helpful answer, thank you.
 8 We had been dealing with the briefing that you
 9 received from Superintendent Nawaz. Your staff officer
 10 was also in the command suite by that stage;
 11 am I correct?
 12 A. Yes.
 13 Q. And indeed we know that by 11.25 she was making notes
 14 and there's one particular aspect of her notes that
 15 I wanted to take you to. {INQ029052/1}.
 16 I think you'll have had an opportunity to see this
 17 fairly recently. We can see that at 23.25, we won't
 18 pick over every entry, one of the things that is noted
 19 is:
 20 "Obtain Plato plan."
 21 So does it follow that you had given an instruction
 22 that the Plato plan was to be obtained?
 23 A. Yes.
 24 Q. Should the inquiry regard it as undesirable that a copy
 25 of the Plato plan was not to hand within the command

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1 suite?
 2 A. Yes.
 3 Q. Do you recall whether you ever obtained a copy of the
 4 Plato plan that night?
 5 A. The request wasn't for me personally, because I'd
 6 already seen the Plato plan, but it was because Arif and
 7 Ali clearly didn't know what it was and my request to
 8 them was to find out in terms of notifications and
 9 progress against the FDO's responsibilities where
 10 we were. I wouldn't have expected and I believe that
 11 request was subsequently made of Dale Sexton.
 12 Q. It was?
 13 A. I wouldn't have expected that they had to go anywhere
 14 other than the Silver room for the plan.
 15 Q. As we know, that was not the position. A little further
 16 down that page, very much towards the bottom, there's an
 17 entry that reads:
 18 "Who have we called?"
 19 Do you see that?
 20 A. Yes.
 21 Q. Should we understand that that is a reference to
 22 emergency service partners?
 23 A. Again, these are Ali's notes but I would expect that is
 24 Ali noting the fact that I have asked, probably a few
 25 times since I have arrived, who's been called, where are

1 we at, what's the update, where are we in relation to
 2 Plato.
 3 Q. The question might have been broader than emergency
 4 service partners, but it included emergency service
 5 partners?
 6 A. In my head, obviously bearing in mind I'm aware of the
 7 plan and the notifications that Dale had to undertake,
 8 what I wanted to know was: is anybody else -- I knew
 9 myself I hadn't been contacted and I'm one of those 16
 10 notifications, so I wanted that reassurance that we had
 11 done all the things we should have done.
 12 Q. Okay. So you had no doubt in your mind that to notify
 13 emergency service partners was the responsibility of the
 14 FDO, Mr Sexton?
 15 A. Yes.
 16 Q. And it's obvious from what you've said, and would be
 17 surprising otherwise, that you are aware that the FDO
 18 did not that night inform the Fire and Rescue Service or
 19 Ambulance Service that Operation Plato had been
 20 declared?
 21 A. Yes, correct.
 22 Q. And do you have from your position as Gold commander any
 23 comment to make upon that failure or decision by him,
 24 whichever it was?
 25 A. Yes. Obviously, if the decision I was made aware of,

1 obviously, following the expert report had never come to
 2 light before that, I knew obviously that there were
 3 issues that ambulance and fire both felt they hadn't
 4 been told, but I was not aware that Dale had made the
 5 decision to not notify them on the night. If I had been
 6 made aware of that decision -- do you want me to deal
 7 with that now?
 8 Q. Let's deal with it in the stages that you're indicating.
 9 Let's proceed for the moment on the basis that
 10 a decision was made by the FDO, "I am going to conceal
 11 the fact that Operation Plato has been declared", which
 12 was his very firm position in evidence.
 13 A. Yes.
 14 Q. So first of all, if that proves to be correct and he
 15 made that decision, your view is?
 16 A. That that was incorrect and his responsibility was to
 17 notify the emergency services of Operation Plato.
 18 Q. And if it was not a decision, because this was an issue
 19 that was explored with him, as you'll know, it was not
 20 a deliberate decision but in fact was an oversight and
 21 with everything else he had on, he simply forgot to do
 22 it, would that in your view be a serious failure by the
 23 FDO?
 24 A. I think it would be considered understandable due to the
 25 stress and pressure and explainable in the sense that he

1 may have forgotten to do it, but it would have been
 2 a serious failure because our approach to this incident
 3 is dependent on our emergency services colleagues being
 4 aware of Plato.
 5 Q. So a serious failure but one that you could have
 6 a degree of understanding for --
 7 A. Yes.
 8 Q. -- bearing in mind the significant burden that he was
 9 under?
 10 I think it must follow that you were never told by
 11 the FDO that he had made this decision, if decision he
 12 made?
 13 A. No, I wasn't told.
 14 Q. And you were unaware, is this correct, that your
 15 partners had not been informed that Plato had been
 16 declared?
 17 A. Absolutely, yes.
 18 Q. When did you discover that that was the position?
 19 A. That they hadn't been told about Plato?
 20 Q. Yes.
 21 A. In relation to the inquiry in terms of the expert report
 22 I realised that it had been concealed, but I think it
 23 was Kerslake, when we were preparing for Kerslake, I was
 24 aware that obviously the information had not been
 25 passed.

1 Q. So you became ---
 2 A. I didn't know the reason why.
 3 Q. You became aware that it hadn't happened during the
 4 Kerslake process?
 5 A. Yes.
 6 Q. And very much more recently you have discovered ---
 7 A. The reason why.
 8 Q. --- the reason why?
 9 SIR JOHN SAUNDERS: You told us that you got together with
 10 Mr Sexton the day after this, on the Tuesday?
 11 A. He and I had a conversation on the Tuesday evening.
 12 SIR JOHN SAUNDERS: Right. Maybe not detailed discussions
 13 then about what had happened, but did you have other
 14 discussions in the days following with him about what
 15 had happened or not particularly? Or did you leave that
 16 to a debrief process?
 17 A. Yes. It's fair to do that in a debrief and obviously
 18 we were very, very busy for the following 3 weeks.
 19 I certainly had a conversation with him on the Tuesday
 20 to thank him, more than anything, for the work he had
 21 done and he just said, "I'm sorry I didn't get a chance
 22 to call you last night", but we didn't discuss ---
 23 SIR JOHN SAUNDERS: He didn't say anything about ---
 24 A. No, and I really wish he had because it would have been
 25 helpful in the following months, but equally because

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1 probably the impact on him in terms of holding that
 2 decision.
 3 MR GREANEY: At 23.41, as I have mentioned a couple of
 4 times, you spoke on the telephone to Mark Dexter and
 5 we'll get to that in due course, although probably after
 6 lunch.
 7 Before that, I just want to deal with four general
 8 topics that will assist the chairman in due course.
 9 (1), Operation Plato. We've spent a lot of time
 10 talking about it already, I appreciate, but I want to
 11 understand in particular your level of understanding of
 12 Plato and understand also some the things that you have
 13 said about Plato in the past. And I have got Kerslake
 14 in mind. That is issue (1).
 15 (2) is major incident. (3), your role as Gold and
 16 SFC. And (4), an issue I promised the chairman we would
 17 come to, the burden upon the FDO in the event of an
 18 incident such as this.
 19 First of all, your knowledge of and attitude towards
 20 Operation Plato.
 21 I want to begin by understanding what you understood
 22 the GMP plan to be. At paragraph 93 of your witness
 23 statement, you identified a GMP document that we have
 24 been describing as "the Whittle plan" as the one that
 25 you read as part of your work on the specialist

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1 strategic firearms commander's course.
 2 A. Yes.
 3 Q. Let's remind ourselves, that was the course that you
 4 attended between 7 and 12 May?
 5 A. Mm--hm.
 6 Q. Let's put this on the screen. It's {INQ029178/1}.
 7 I think at {INQ029178/4} we can see the burden upon the
 8 FDO. We've seen this many, many times now. I think
 9 you've probably had an opportunity to refresh your
 10 memory from it recently.
 11 A. Yes.
 12 Q. So just take that from the screen, Mr Lopez, please.
 13 This is a plan that was created following the
 14 refreshed CTPHQ Plato guidance that we discussed
 15 earlier. It was completed on 4 May 2017 and it was sent
 16 out to FDOs and others, which others included you ---
 17 A. Yes.
 18 Q. --- and we can look at the email, but it seems not
 19 necessary --- on 12 May.
 20 So let's just think about those dates. It was
 21 finalised 3 days before your course started and it was
 22 circulated to FDOs and to you on the last day of your
 23 course. So let me ask you a direct question: are you
 24 clear that that was the plan that was the plan in
 25 operation on the night of the arena attack?

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1 A. Yes.
 2 Q. Are you aware that some people thought that that was the
 3 plan that was in force and others, for example
 4 Superintendent Giladi, thought that an earlier version
 5 of the plan, namely SOP 47 v5, was in force?
 6 A. I'm aware of that through the inquiry, yes.
 7 Q. Is it in your view undesirable, indeed highly
 8 undesirable, that different people with roles or
 9 potential roles to play should have different views
 10 about which plan was in operation?
 11 A. Yes.
 12 Q. I'm not singling you out for any criticism at all, you
 13 weren't responsible for this. I'm inviting you to agree
 14 the obvious, namely that that is highly undesirable.
 15 We now know to which plan you were personally
 16 working and I just want to delve a little deeper into
 17 your attitude towards Plato. I know that the inquiry,
 18 in terms of making recommendations for the future, will
 19 welcome your further views.
 20 Plato was, do you recall, something to which you
 21 made reference during the course of Lord Kerslake's
 22 process?
 23 A. Yes.
 24 Q. Indeed, Lord Kerslake was the person who interviewed you
 25 as part of this process?

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1 A. That's correct.
 2 Q. Although at very substantially shorter length than I've
 3 achieved even so far. I'm going to ask that we see what
 4 you said to him. I assure you, there's no trick in
 5 this. I want to draw attention to it and ask you what
 6 you meant by some of it.
 7 First of all, this is {INQ026715T/34}.
 8 SIR JOHN SAUNDERS: This looks like a transcript.
 9 MR GREANEY: It is a transcript, yes.
 10 SIR JOHN SAUNDERS: So it was recorded, this particular
 11 interview?
 12 A. Yes, sir, it was.
 13 SIR JOHN SAUNDERS: Thank you very much. It's just helpful
 14 to know.
 15 MR GREANEY: I'm actually not aware of any that weren't
 16 recorded, but I could be easily wrong about that.
 17 SIR JOHN SAUNDERS: You could. We've had another witness
 18 who said, when shown the notes of the interview, that
 19 they didn't match actually what was said.
 20 MR GREANEY: I know for example of ones that I have looked
 21 at that Mr Sexton's certainly was recorded and also
 22 Mr Dexter's, as we'll discover, tomorrow, I hope.
 23 We can see on the screen that the person who is
 24 identified as questioning you is Alan Goodwin, a member
 25 of the panel. That's a mistake, it was Lord Kerslake

1 himself.
 2 A. It was, yes.
 3 Q. {INQ026715T/34} then. Lord Kerslake:
 4 "What was the most -- what was the significance of
 5 calling Plato for you? What were you thinking at that
 6 point?"
 7 And you answered:
 8 "The bit for me around Plato is that we -- it was
 9 our response to that ongoing threat. So the fact that
 10 Dale called it -- and again this is a point that's been
 11 considered by many people, I think, over the last few
 12 months. I don't claim to be any expert in firearms
 13 command or anything, but everyone's got a different view
 14 on Plato. I think what Plato enabled us to do was to
 15 have the response ready should we need it. So the fact
 16 that he called it within the first 20 minutes, it
 17 initiates a series of events that gets... group heading
 18 in our direction."
 19 I'm drawing your attention to that to begin with.
 20 I'm not going to ask you a question at the moment, but
 21 you'll appreciate that what I'll want to ask you about
 22 is, "Everyone's got a different view on Plato", and so
 23 we will come to that in a moment.
 24 A. Yes.
 25 Q. Next, {INQ26715T/39}, please, the very bottom of that

1 page. Lord Kerslake:
 2 "The challenge or the issue comes, I think, less
 3 with that interpretation of Plato, 'We've stood up
 4 resources, they're on standby, let's have them here in
 5 case', and more with what other people understood by
 6 Plato and what they did and, in particular, how did NWAS
 7 respond by way of presence on the foyer and the
 8 concourse. Was Plato an issue or not for them? Did it
 9 influence the point you were making about -- because
 10 your judgement was a much more pragmatic one which is
 11 whether we call it hot, warm or cold, we've got people
 12 there."
 13 So you are making the point that whatever zoning you
 14 apply, there are already people in the City Room;
 15 am I right?
 16 SIR JOHN SAUNDERS: Could you go back a page?
 17 MR GREANEY: Of course, sir {INQ026715T/38}.
 18 SIR JOHN SAUNDERS: The bit you read out is not what -- it's
 19 the question, I think.
 20 MR GREANEY: I thought I was...
 21 SIR JOHN SAUNDERS: I may have got lost.
 22 MR GREANEY: That's entirely my fault. It is the question,
 23 you're quite right.
 24 What's being suggested to you is that the decision
 25 you had made was a pragmatic one, namely whether you

1 call the City Room hot, warm or cold, there are actually
 2 people in there?
 3 A. Yes.
 4 Q. And you replied:
 5 "Who were in it, yeah."
 6 And Lord Kerslake said:
 7 "You didn't at any point think, 'I need to take
 8 people out that', you thought --"
 9 And you added:
 10 "As I said earlier, one of my considerations because
 11 if I take my -- a friend of mine was doing this whilst
 12 driving a car. My head was very much around: this is
 13 a terrorist attack, we don't know what's coming next and
 14 I've got a load of people in that scene, can
 15 I practically now withdraw from that scene and keep
 16 people safer by doing that? There was nothing I had
 17 that told me that would be the case because we were
 18 already there."
 19 So I emphasised the wrong point. What you are
 20 emphasising is: whatever zone the City Room is, there
 21 are people in there and one needs to respect the
 22 practical consequences of that.
 23 Then if we finally go to {INQ026715T/50}, please.
 24 Then Lord Kerslake:
 25 "How firm was this warm, hot, cold? Technically, if

1 it was warm, they shouldn't be there, but as you say,
 2 the practical reality was they were there."
 3 So Lord Kerslake appears to be making the point that
 4 you had non-specialist resources in an area which was
 5 a warm area. You replied:
 6 "They were there anyway, yes."
 7 Lord Kerslake:
 8 "So in a sense did you simply -- did that just not
 9 feature very strongly, the designations, or was it
 10 not --"
 11 And you replied:
 12 "In the conversations that I had, my conversations
 13 with Mark at the scene were very much about how does it
 14 feel, how does it look, have you got what you need?"
 15 Over the page {INQ026715T/51}:
 16 "So who made the decision on what was hot or warm or
 17 cold?"
 18 You reply:
 19 "Mark, I think, did some assessment of that at the
 20 scene. I know that post-event that Mark had had a
 21 conversation, I think, with the Fire Service, hadn't he
 22 around..."
 23 Then a little bit further down, Lord Kerslake:
 24 "In truth, it wasn't the driving force of what
 25 happened on the ground with context or reference to

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1 zoning?"
 2 And you replied:
 3 "No."
 4 I hope that I have drawn attention to the relevant
 5 parts; if I haven't I know someone else will.
 6 So now my questions. First, what did you mean by
 7 saying that "everyone has a different view on Plato"?
 8 A. So in the context of being interviewed by Lord Kerslake,
 9 obviously we'd had a few months since the bomb, and
 10 in the debriefs that I attended and the conversations
 11 that I had with colleagues, and also presenting to the
 12 specialist tactical and strategic firearms courses three
 13 times, everyone had a different perspective on whether
 14 Plato should have been called on the night, whether it
 15 was applicable, and how it was applied. So that's what
 16 I meant in the context of that bit.
 17 Q. We have been over this already and I'm not going to
 18 traverse the same ground at length, but the whole point
 19 about Plato, good or bad, is that it is rigid, is it
 20 not?
 21 A. Mm-hm.
 22 Q. And so there ought not really to be much scope in terms
 23 of its interpretation, do you agree?
 24 A. I agree in terms of if you read it, it tells you what
 25 you should do and what should happen, but I think

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1 equally it talks to -- it's an evolving picture. And
 2 I think ahead of the arena attack, the picture was
 3 changing anyway in terms of the way people were
 4 discussing it in firearms CPD. So I think it was --
 5 I think the NPCC guidance that came out in the March 17
 6 started almost to expand what a marauding terrorist
 7 firearms attack could have in terms of the early
 8 considerations, so I think when I talked around people
 9 having different views, everyone will always judge
 10 a situation differently and apply their own thought
 11 process and rationale as to why they do things.
 12 But in terms of Plato, it felt very much, both pre
 13 the arena and post, that there was still huge
 14 uncertainty and difference of opinion as to whether this
 15 was Plato or wasn't Plato, what people would have done
 16 differently.
 17 Q. Secondly, Lord Kerslake made the point to you that you'd
 18 adopted a pragmatic approach --
 19 A. Yes.
 20 Q. -- to the warm zone but you had people in there and you
 21 agreed with him that zones did not feature strongly.
 22 A. No, they didn't.
 23 Q. Is really what you were accepting in those frank
 24 exchanges with Lord Kerslake something that we discussed
 25 earlier, that you recognised that night that on a strict

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1 interpretation of Plato, some of the responders who were
 2 in the City Room just should not have been there?
 3 A. In a strict application of Plato, yes.
 4 Q. But you took a pragmatic view that the people who were
 5 there needed to stay in order to give treatment?
 6 A. Yes.
 7 Q. This really I think, takes us back to something you
 8 accepted earlier, that this would seem to be an
 9 indication that Plato at that time was or was capable of
 10 being too rigid.
 11 A. Yes, but equally that it should be adapted according to
 12 the circumstances that you find yourself in.
 13 Q. And this is the same point, we're back to it again, the
 14 need for commanders to be afforded a degree of
 15 discretion, even in a true Plato situation?
 16 A. Absolutely, and to make decisions based on that.
 17 Q. Second topic, major incident. Have you had a chance to
 18 look at the GMP major incident plan?
 19 A. I have, yes.
 20 Q. Were you familiar with the plan before the arena attack?
 21 A. I had not read it cover to cover, but I had looked at it
 22 when I first went to GMP in order to acquaint myself
 23 with its contents ahead of being the Gold commander.
 24 Q. It's well over 200 pages long.
 25 A. 225, I think, yes.

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1 Q. 225. This is just one of hundreds of plans and policies
 2 that GMP has?
 3 A. Yes.
 4 Q. It is obviously an important one, but is your position
 5 that you couldn't reasonably be expected to know every
 6 line of every single plan and policy?
 7 A. Yes.
 8 Q. I am just going to take you to this particular plan and
 9 I'm sure you'll appreciate I'm going to be asking you
 10 whether you should have brought it into effect. The
 11 plan is {INQ007279/1}.
 12 Let's have page 1 and then {INQ007279/7}, please.
 13 There is the plan. On page 7 I hope we'll find the
 14 definition of a major incident. Yes, we will.
 15 Under "Notes":
 16 "A major incident is beyond the scope of
 17 business—as—usual operations, and is likely to involve
 18 serious harm, damage, disruption or risk to human life
 19 or welfare, essential services, the environment or
 20 national security."
 21 Can we agree that the Manchester Arena attack was
 22 certainly a major incident?
 23 A. Yes.
 24 Q. And do you accept that you should have declared it as
 25 such?

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1 A. Yes.
 2 Q. And do you agree that you did not do so or direct anyone
 3 else to do so?
 4 A. When I became aware that we hadn't declared the major
 5 incident, Chris Hill added to the log.
 6 Q. That was at 1 am?
 7 A. At 1 o'clock in the morning, yes.
 8 Q. And isn't that just far too late?
 9 A. Yes, it should have been declared at the outset, in the
 10 early minutes basically.
 11 Q. What is the explanation, if there is one, for why it was
 12 not declared?
 13 A. I can't account for what others did or did not do prior
 14 to me being made aware that we hadn't declared it. It
 15 was obviously a major incident. I would expect in
 16 everything else that was happening it was an oversight
 17 but I can't speak for others as to why it wasn't done.
 18 Q. There was, as we heard from Superintendent Nawaz
 19 yesterday, a contingency plan for Manchester Arena.
 20 A. Yes.
 21 Q. I think very recently, you've been asked to have a look
 22 at that.
 23 A. I have, last night.
 24 Q. I'm sorry for the shortness of notice, that's down to
 25 me. I'm going to ask that we look at a couple of very

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1 short parts of it. {INQ007219/4}, first of all, please.
 2 This is a site—specific plan I promised you:
 3 "This is the contingency plan for the arena,
 4 designed as an aid to assist officers responding to an
 5 incident. It must be used in conjunction with the GMP
 6 major incident plan."
 7 That night, was this contingency plan ever drawn to
 8 your attention by Superintendent Nawaz?
 9 A. No.
 10 Q. Were you aware of it that night in any other way?
 11 A. No, I wasn't aware of the plan.
 12 Q. So it follows that you didn't have it available to you
 13 that night?
 14 A. No.
 15 Q. So you weren't able to refer to it?
 16 A. No.
 17 Q. In those circumstances, I won't ask you about any
 18 further aspects of it.
 19 SIR JOHN SAUNDERS: So obviously, it could have been of use
 20 to you on this night? That's what it's there for.
 21 A. Yes.
 22 SIR JOHN SAUNDERS: Is there any way in which
 23 Gold commanders like you should have been made aware of
 24 it so you do have it there when you need it or is it
 25 something that they would expect you to think of or

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1 what?
 2 A. I think it's one of those things that if you are dealing
 3 with an event at a particular location, and it applies
 4 to the earlier conversation, should we have been aware
 5 of the arena and its contingency plans, because we may
 6 have had to apply our policing support to it. If I am
 7 dealing with an event I would always look at the plans
 8 and have meetings with the Silver in pre—planned
 9 situations so I was aware of other plans and evacuation
 10 plans but not this specific location because I haven't
 11 had to deal with an event there.
 12 SIR JOHN SAUNDERS: I understand on pre—planned incidents
 13 that people have plenty of time to look through and find
 14 out whether there is one and things like that. Would it
 15 have helped you on this night to have this or might it
 16 have helped you?
 17 A. I don't think there's an awful lot in the plan that is
 18 any different to what's in the major incident plan
 19 anyway. But you could always — additional information,
 20 maps, you know, views of or pre—identified RVPs, which
 21 I know was raised yesterday, could be of benefit in
 22 a response, but that information would have been
 23 available to me in the Silver and Gold rooms if we'd
 24 needed to access it.
 25 SIR JOHN SAUNDERS: Right. So if it might be of use, what

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1 can be done to try and make sure that you on
 2 a spontaneous incident will know that it's there?
 3 A. I think it's a case of, well, we need to have fewer
 4 plans and we need to be very clear, based on the threat
 5 assessment, of the key locations, iconic locations and
 6 event locations, so they're all readily available and
 7 that the Silver room staff, who are effectively doing
 8 this all the time, and the events planning teams can
 9 say, "Here's the plan, it's happened here, here it is".
 10 SIR JOHN SAUNDERS: Thank you.
 11 MR GREANEY: We will in fact just look at a couple of pages
 12 of the contingency plan in light of the questions the
 13 chairman has posed. Let's have it back on the screen,
 14 please, {INQ007219/4}. We'll look at the checklist on
 15 pages 5 and 6 {INQ007219/5-6}.
 16 I'm not going to read through each one, but:
 17 "Declare a major incident. Ensure other emergency
 18 services and support agencies are aware. Request OCR to
 19 assign a Talk Group. Identify a forward control post."
 20 Having this kind of checklist would have been of
 21 assistance to you that night, do you agree, to ensure
 22 that the things that needed to be done and that you
 23 expected had been done had in fact occurred?
 24 A. That kind of checklist helps, but certainly the first
 25 four there are in JOPs as well, and the others are

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1 in the major incident plan.
 2 Q. There's a column headed "Action".
 3 A. Yes.
 4 Q. And it seems obvious that if you'd had to go through
 5 a process, going down and --
 6 A. Yes.
 7 Q. -- (overspeaking) some of the things that hadn't
 8 happened might have been revealed to you?
 9 A. Yes. Again, that's something that the tactical
 10 commanders should do.
 11 SIR JOHN SAUNDERS: You're saying this is generic, it's not
 12 particular to the arena. Do we have something in here
 13 which is --
 14 MR GREANEY: This is particular to the arena, this one.
 15 SIR JOHN SAUNDERS: I know it is, but the actual actions are
 16 not arena-specific, they would be applicable to any
 17 major incident.
 18 MR GREANEY: I take your point, yes.
 19 A. They look very familiar in terms of the major incident
 20 plan and JOPs.
 21 Q. I understand, thank you.
 22 A. But yes, an action sheet with a checklist would be
 23 beneficial.
 24 Q. Would help?
 25 A. Yes.

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1 MR GREANEY: Sir, I'm told we can sit on for another
 2 10 minutes or so. That should enable me to finish those
 3 four topics, then we can return after lunch to the
 4 chronology if the witness is content to carry on.
 5 A. No problem.
 6 Q. No more than 15 minutes.
 7 So I indicated the next was your role as Gold and
 8 SFC. Would it be an overstatement or accurate to say
 9 that, as Gold that night, the buck stopped with you?
 10 A. Yes.
 11 Q. It would be accurate to say that?
 12 A. It is, yes.
 13 Q. A place to look at your role that evening is the major
 14 incident plan, so this is {INQ007279/11}. 3.1.1, "The
 15 strategic/Gold commander".
 16 Have you had a chance to look through this list of
 17 things?
 18 A. Yes.
 19 Q. And do you agree that it represents your
 20 responsibilities that night?
 21 A. Yes.
 22 Q. Do you consider in relation to any of them that you
 23 didn't discharge that aspect of the responsibility?
 24 A. Yes, I mean, there's areas within there that clearly, on
 25 the night, for example communicating the strategy more

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1 broadly with other organisations, I would say, yes,
 2 albeit I would suggest that it was obvious that
 3 protecting life was our overarching aim.
 4 The SCG obviously, I suspect, is a topic you wish to
 5 discuss in more detail.
 6 Q. Indeed, after lunch.
 7 A. "Consider appointing a separate police Gold commander."
 8 I did -- and I have talked about John O'Hare being
 9 involved in the structure. My view on that was somebody
 10 had to hold all the information because, bearing in mind
 11 there was almost the overt and then the covert side of
 12 this, I felt that one person needed to have the
 13 situational awareness throughout the early stages.
 14 I didn't consult with partner agencies and community
 15 groups in determining the strategy. I did feel the
 16 strategy spoke for itself and community groups would
 17 have been impossible at that stage.
 18 Q. Yes.
 19 A. "Support decision-making at tactical level."
 20 I was available to the tactical commanders
 21 throughout, so I feel that was done. I didn't need to
 22 set parameters within the tactical command work.
 23 Perhaps, again on reflection, I should have given
 24 clarity to both Mark Dexter and to Arif and subsequently
 25 Chris in terms of my expectations of them, both within

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1 the FCM and at the scene. That could have been
 2 improved.
 3 Briefings. I briefed a lot of staff individually
 4 around the strategy, predominantly those people were
 5 within CT and GMP initially when I arrived, so again you
 6 could argue that should be more broad, but for me it's
 7 when is the most appropriate time to do that. I was
 8 available, I was there in the command suite to ensure
 9 that communication in the absence of formalised
 10 meetings.
 11 Command protocols had been agreed between the ITFC
 12 and TFC around the scene management and within the room
 13 in terms of the TFC that had arrived.
 14 Resourcing was a big part of my responsibility and
 15 I think I did that adequately in terms of providing
 16 resources to the scene, asking Mark Dexter what he
 17 needed.
 18 Q. In fact, ultimately, he was to consider that he had too
 19 many resources at the scene?
 20 A. Yes, but equally understanding the resources that are
 21 needed more broadly across GMP to continue as well.
 22 Clear lines of communication. That obviously is
 23 an issue. Communication did not work well for a number
 24 of reasons.
 25 Q. Indeed.

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1 A. The resilience and effectiveness of the command team,
 2 the consequence management—type side. Yes, I think
 3 I did that by putting the command structures in place
 4 and planning beyond the immediate response phase by
 5 asking Mr Pilling to deal with the business as usual and
 6 the wider force needs over the coming few days. So
 7 I think elements of that I certainly did. There are
 8 areas certainly that I could do better or differently
 9 and areas that I just couldn't do on the night because
 10 they were not things that I could have achieved.
 11 Q. We'll just go over the page to make sure there's nothing
 12 else. If there is, it will deal with subsequent events.
 13 {INQ007279/12}:
 14 "Has overall responsibility within the command
 15 structure for [a number of]" —
 16 A. Health and safety, yes, and all those other aspects as
 17 well, so that's reflected in the kind of second strategy
 18 around ensuring — maximising the safety of our
 19 emergency services responders.
 20 "Identifying the level of support required to
 21 resolve the incident."
 22 Again, making sure there's sufficient assets at the
 23 scene and available to respond to anything else. I put
 24 in place the SIO, Denise Worth, and I contacted the
 25 Senior Identification Manager John Chadwick subsequently

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1 to deal with the DVI process.
 2 I dealt with communication and media strategies.
 3 I didn't have responsibility for post—incident
 4 debriefing, although I did attend to speak to staff who
 5 had been at the scene in the early hours before I did
 6 the SCG to get a feel for how they'd experienced this
 7 and just to discuss with them generally because they
 8 were very distressed having returned to HQ.
 9 I did participate in the structured debriefs,
 10 although I wasn't responsible for undertaking it, that
 11 was done by Mr Pilling.
 12 Organisational learning. An action plan was again
 13 done through the debrief process with Mr Pilling.
 14 Q. Thank you very much for going through that so clearly.
 15 I believe that one thing that needs to be kept in mind
 16 is that you had that day, even before these things
 17 happened, worked a long day, had you not?
 18 A. Yes, I'd been at work all day.
 19 Q. And to say the least, the events in the command suite
 20 must have been demanding ones?
 21 A. They were, yes.
 22 Q. The fourth topic and then we will break for lunch, the
 23 burden on the FDO.
 24 HMIC visited GMP in October 2016 and it appears that
 25 you had some involvement in the preparation for that.

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1 The reason I'm suggesting that is because of
 2 a particular email chain. The reference is
 3 {INQ041073/1}.
 4 We can see this is an email dated 19 October 2016,
 5 and it's been sent from you to you, but I think in fact
 6 the recipient was Catherine Hankinson —
 7 A. Yes.
 8 Q. — who was another ACC.
 9 A. Yes, that's right.
 10 Q. "As mentioned here are some notes from my conversation
 11 with Chris Byrne at ACPO TAM yesterday."
 12 We know that that was the predecessor organisation
 13 to CTPHQ:
 14 "He's not our inspector but he's floating and said
 15 he will most likely drop into GMP with Andy (Buckle
 16 I think he said)..."
 17 I think that's presumably a reference to Mr Buchan?
 18 A. Mr Buchan, yes.
 19 Q. "... during our 3 days."
 20 This is a reference, is it not, to HMIC paying a
 21 visit to GMP?
 22 A. Yes.
 23 Q. "Chris has confirmed what we know anyway but this is
 24 very much focused on force duty officers and how they
 25 would respond in the first 4 hours of an MTFA."

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1 So this is really precisely on the point that I'm
 2 exploring with you.
 3 A. Yes.
 4 Q. "Work ahead of the inspections has shown that although
 5 everyone has comprehensive plans in place, actually
 6 knowing them, testing them and checking responses is
 7 limited."
 8 Then the final line on that page:
 9 "I did talk to Chris about the proposed move of FDOs
 10 to force headquarters (I hope that's still the case)."
 11 This was, I think, the proposal we heard about from
 12 Mr Booth --
 13 A. Yes.
 14 Q. -- and former Inspector Roby, that they were talking
 15 about moving the FDOs from where they were to force
 16 headquarters?
 17 A. Yes.
 18 Q. Over the page {INQ041073/2}, please. I'm not going to
 19 read out every line:
 20 "Specific questions will focus on..."
 21 And then a little further down:
 22 "What knowledge, training and experience is there
 23 among FDOs and commanders in this response plan?
 24 Tested, exercised and evidenced?
 25 "Still in general, Chris is of the view that all

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1 forces will have comprehensive plans but does not feel
 2 that they are fully understood and ready to go with full
 3 confidence that each person involved knows their role
 4 and how we cross over into the CT world. He emphasised
 5 this is very much about initial response and will be
 6 spending a lot of time in OCB and with FDOs and also
 7 wants to interview the strategic lead, ie you."
 8 Then back to page 1 {INQ041073/1}, ACC Catherine
 9 Hankinson replies the same day:
 10 "Really helpful, thanks. Hopefully Shelly will ring
 11 me late so I can ensure correct people from CT able to
 12 articulate that bit."
 13 So we can take that from the screen. So there was
 14 no doubt in October 2016 that of the things that HMIC
 15 was coming to GMP to consider and review as part of CT2,
 16 was the role of the FDO and how it was liable to work in
 17 practice in the event of an MTFA?
 18 A. Yes.
 19 Q. Why was it that you were sending that email?
 20 A. Because I had CT policing responsibility at the time for
 21 North-west CTU. As I said in the email, I attended the
 22 ACPO TAM meeting in the October. At that meeting
 23 I think, as I recall, it was Neil Basu's first as the
 24 SNCs. There was a series of presentations and Mr Byrne
 25 had given a presentation to those attending outlining

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1 the purpose of CT2. I took notes during that, had
 2 a conversation with Chris, and then I compiled them and
 3 shared them with Catherine.
 4 Q. What was the role of ACC Hankinson that made it relevant
 5 that she should receive that information?
 6 A. Catherine had recently taken over as temporary ACC
 7 responsible for specialist operations and the OCB.
 8 Q. So did that mean it was going to be her responsibility
 9 if problems were identified with the FDO --
 10 A. Yes.
 11 Q. -- to ensure that they were resolved?
 12 A. Yes, it was her business area.
 13 Q. Right. Just whilst we're dealing with this, you had
 14 come into force, GMP at any rate, after Exercise
 15 Winchester Accord, had you not?
 16 A. Yes, I started in June 2016.
 17 Q. So the next month. Were you made aware, or did you
 18 become aware from any source, that Exercise
 19 Winchester Accord had identified a problem with the FDO
 20 becoming overburdened?
 21 A. I wasn't aware of that, no.
 22 Q. Next I'm going to invite your attention to an email that
 23 Catherine Hankinson sent to chief officers as a result
 24 of an HMIC hot debrief that was carried out with her by
 25 Mr Buchan. Can I make plain that we have you to thank,

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1 I believe, for locating this email chain; is that
 2 correct?
 3 A. Yes, that's right.
 4 Q. Could we have on the screen, please, {INQ041272/1}.
 5 The email from ACC Hankinson is dated 3 November
 6 timed at 19.36, and it's sent to chief officers. Does
 7 that mean it would have been received by the
 8 chief constable, the deputy chief constable, and the
 9 assistant chief constables, including you?
 10 A. And the ACO, yes.
 11 Q. The?
 12 A. The assistant chief officer.
 13 Q. If we turn over the page {INQ041272/2}, please,
 14 Mr Lopez. I'm not going to read out every word. We'll
 15 look at it with ACC Hankinson in due course.
 16 She was identifying in this email areas for
 17 development were:
 18 "Is there enough resilience around the FDOs in the
 19 event we have an MTFA-style incident? This wasn't
 20 really about numbers of people but about people having
 21 specific roles in specific seats. Our FDOs were able to
 22 evidence that they had picked this up from exercising
 23 during summer and they were getting on with producing
 24 guidance and crib cards for colleagues. HMIC did accept
 25 that our current IT hampered us but are aware this is

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1 being upgraded."
 2 Back to {INQ041272/1}. We can see that on
 3 4 November, the following day, the chief constable,
 4 Mr Hopkins, sends a reply thanking ACC Hankinson and
 5 saying:
 6 "Debbie, worth feeding this into the national
 7 network."
 8 So Debbie in this context would be you?
 9 A. Yes, that's right.
 10 Q. So what did you understand you were being invited to do?
 11 A. I believed I was being invited to just inform the
 12 national CTP network that we'd had the inspection and
 13 that was the outcome, but Andy Buchan was dealing with
 14 the issues more nationally. So that was my
 15 interpretation of Ian's request.
 16 Q. So what the evidence revealed, or may depending on the
 17 view of the chairman reveal, is that between 3 November
 18 and 22 May, no substantive progress was made in response
 19 to the issue that had been raised in the sense that no
 20 action cards were available to the staff in the OCR on
 21 the night of the arena attack and, so far as the FDO is
 22 concerned, he did become overburdened and in fact one of
 23 the things that had happened was that, between November
 24 and May, the Plato plan that you were working to had
 25 been created and that increased the burden on the FDO.

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1 Can you help from the position that you held with
 2 why no real progress was made and, indeed, why in one
 3 important respect things were made worse?
 4 A. I can't account for why the activity between the
 5 inspection and May didn't address those issues. It's
 6 not my business area. I would have expected, if that's
 7 the feedback we had, that activity was underway and
 8 Catherine talks to that, that there's already things
 9 happening. If it's the case that those action cards and
 10 that additional support wasn't in place, again, I don't
 11 mean to devolve responsibility from myself, it wasn't my
 12 business area so I didn't have responsibility for OCB or
 13 dealing with the outcome of that inspection.
 14 Q. And did you expect that whoever was responsible for that
 15 business area would be the person that would deal with
 16 it?
 17 A. Yes, that the OCB, under Catherine's direction, would
 18 deal with those issues.
 19 Q. And in your view did the email identify a need for
 20 important action to be taken?
 21 A. It certainly suggested an area that should be focused
 22 on, so — can you put it back on the screen for me,
 23 please?
 24 Q. Of course.
 25 A. {INQ041272/2}, sorry.

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1 Q. Can we go to the second page?
 2 A. Yes. So in terms of the first point about the FDOs,
 3 Catherine says there something about the numbers but
 4 about specific roles and specific seats, and that the
 5 FDOs had obviously evidenced during the inspection that
 6 they'd already picked up the issues themselves and were
 7 producing guidance. I would have expected that to be in
 8 place if that was the case, in terms of what Catherine
 9 said there, by May 2017.
 10 Q. Let's be very straight about this: in the event that
 11 there was an MTFA, the FDO was going to have a critical
 12 role, certainly in the initial stages?
 13 A. Yes.
 14 Q. And if there was a risk of that person becoming
 15 overburdened, as identified in November, that was
 16 something that needed to be dealt with?
 17 A. Addressed.
 18 Q. Addressed, as you put it. Did you at any stage before
 19 22 May become aware in any way of this risk to which
 20 I have just referred of the FDO becoming overburdened
 21 in the event of Operation Plato being declared?
 22 A. Not to the extent that I would have thought on the night
 23 that the FDO — I knew the FDO would be very, very busy.
 24 Q. Yes, of course.
 25 A. But I'd have expected that the team around the FDO were

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1 trained and ready to stand up and give that support
 2 because, whichever way you look at it, the
 3 Operation Plato initiation requires a set of activities
 4 and JOPs certainly determines a set of activities that
 5 need to take place there. But I would have expected and
 6 I was surprised a little to find when the FDS
 7 Ian Randall gave evidence, for example, that he wasn't
 8 aware of Plato. So again, things that you kind of think
 9 are happening and should happen on the night, because
 10 that's not the time to find out in a live scenario,
 11 would be in place so I think it's entirely realistic for
 12 me to believe that having had this inspection and not —
 13 Andy Buchan didn't give significant feedback and say,
 14 "These are real issues", that those issues are addressed
 15 very quickly.
 16 MR GREANEY: Thank you very much.
 17 Sir?
 18 SIR JOHN SAUNDERS: Just before I adjourn for lunch, can we
 19 look at this. You have made a point, and this perhaps
 20 adds to the validity of the point, that whereas firearms
 21 officers knew about Plato, knew what it involved and
 22 everything else, unarmed officers who would be involved
 23 in a Plato incident really didn't. So if we look at the
 24 second complete paragraph:
 25 "Really impressed with the knowledge, capability and

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1 enthusiasm of... staff ..."
 2 And it then calls out firearms officers?
 3 A. The specialisms, yes.
 4 SIR JOHN SAUNDERS: And then, in the areas for development:
 5 "Our front line unarmed staff had had no specific
 6 training relating to MTFA. They didn't even know what
 7 it was, really. That said, they've had some manager
 8 training."
 9 But clearly the idea was that there should be some
 10 training. Had anything happened about that as far as
 11 you know?
 12 A. I'd be guessing to say that was the case. I thought
 13 some training had been undertaken and an awareness
 14 raising had taken place, but I'm basing that on
 15 conversations, not fact.
 16 SIR JOHN SAUNDERS: Right. So one other entirely unrelated
 17 matter. Again, looking at the Kerslake Report, the
 18 feature that Lord Kerslake relied on in saying everyone
 19 was very well prepared for what would happen on that
 20 night, was that a training event had taken place at the
 21 Trafford centre in the run-up to this happening.
 22 Did you take part in that and, if so, were you
 23 assisted in your preparation for the night by that
 24 event?
 25 A. I believe that was Winchester Accord, sir. That took

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1 place in May 2016 and I didn't join until --
 2 SIR JOHN SAUNDERS: I think it must be different but we will
 3 check because it was being referred to as happening
 4 fairly soon, recently --
 5 MR GREANEY: Exercise Winchester Accord was certainly in May
 6 of 2016.
 7 SIR JOHN SAUNDERS: Yes, a year before.
 8 MR GREANEY: Exactly.
 9 SIR JOHN SAUNDERS: We'll find out what he's talking about.
 10 Thank you very much. We will adjourn until 2.20.
 11 MR GREANEY: Can I indicate what would be very helpful to me
 12 is that if over lunch the advocates who have Rule 10
 13 permission to ask questions of the Deputy
 14 Chief Constable could send me an email indicating how
 15 long they currently, in light of the evidence, think
 16 they will be.
 17 Also, Mr Dexter is due to start his evidence
 18 tomorrow. My current view is that, bearing in mind the
 19 amount of evidence you've received so far, sir, it
 20 certainly isn't necessary to go through every line of
 21 what he said, but instead that things can be dealt with
 22 thematically. And it would be helpful if those who have
 23 Rule 10 permission to question him could indicate how,
 24 in light of everything we have heard over the course of
 25 the last month, how long they think in fact they will be

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1 with him.
 2 SIR JOHN SAUNDERS: Right. It certainly seems to me, and
 3 I may be deceiving myself, that things have become much
 4 clearer over the last week or so and therefore that
 5 we can hopefully focus in on the areas which really
 6 matter. I may be deceiving myself, there may be other
 7 areas out there which I have never even thought about
 8 but that is how it seems to me at the moment.
 9 MR GREANEY: It seemed to us that Mr Dexter has a number of
 10 issues that his evidence ought to be received upon but
 11 running through the whole of the chronology is not
 12 likely to assist you, sir.
 13 SIR JOHN SAUNDERS: Mr Wood, it seems like you want to say
 14 something.
 15 MR WOOD: Firstly, I agree with that and thank you very much
 16 indeed for the indication. Just to help answer
 17 Mr Greaney's request about how long, if at all,
 18 advocates are going to be after lunch, can I have some
 19 assistance from you, please? You've heard some evidence
 20 today about the interpretation which this witness places
 21 upon the responsibilities of the on-scene commander.
 22 You know the responsibilities as has been explained by
 23 Superintendent Dexter are different, and you've heard
 24 a number of different accounts about that. I am
 25 perfectly prepared to ask relevant questions about that

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1 this afternoon of this witness if it will help you, but
 2 I make the enquiry as to whether in fact that will be
 3 a productive use of your time this afternoon or whether
 4 you would prefer simply to hear his analysis tomorrow.
 5 SIR JOHN SAUNDERS: At the moment I think it probably won't
 6 but of course I can't account for the brilliance of your
 7 cross-examination.
 8 MR WOOD: I'll think about that over lunch, if I may but
 9 Mr Greaney can probably assume that I won't be very long
 10 when I ask questions later.
 11 MR GREANEY: Thank you very much.
 12 SIR JOHN SAUNDERS: Thank you.
 13 (1.23 pm)
 14 (The lunch adjournment)
 15 (2.23 pm)
 16 MR GREANEY: Deputy chief constable, thank you very much for
 17 helping with those four issues. I'm now going to return
 18 to the chronology of events.
 19 The next significant occurrence, as I have said, was
 20 at 23.41, when you telephoned and spoke to
 21 Chief Inspector Dexter, as he was. We'll listen in
 22 a moment to that call and see a transcript on the
 23 screen, but first of all can I ask you what the purpose
 24 of that call was, please?
 25 A. It was the first call I'd had with Mark Dexter since he

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1 had arrived at the scene, and the purpose of the call
 2 was a number of things. Firstly, to find out exactly
 3 what was going on, what his assessment was as he'd
 4 arrived at the scene, how many casualties we were
 5 dealing with, trying to get a sense of that.
 6 In relation to the ongoing threat management, what was
 7 he doing, what were the activities. That type of thing
 8 was kind of the purpose of the conversation.
 9 Q. As I say, in one moment we'll play it. Can I give
 10 a warning, sir, that at one stage during this short
 11 recording -- it lasts for 3 minutes or so -- I believe
 12 it's possible to hear the alarm from within the arena.
 13 I know that that is, for reasons I entirely understand,
 14 distressing to some, so if anyone wishes to leave,
 15 I will just pause for a moment to enable them to do so
 16 and in the meantime -- or switch off their feed -- I am
 17 going to indicate to Mr Lopez that we need on the screen
 18 {INQ025409/10}, for the transcript, and Mr Lopez, please
 19 follow that as we listen to the recording.
 20 We'll play {INQ025479A/1} from counter time 13:58 to
 21 17:05.
 22 Sir, in terms of our audio schedule, this covers
 23 entries 7916, 7922 and a bit of 8145 and 8160. So all
 24 four of those entries.
 25 The times are slightly different on this. It's

1 about halfway down the page. It starts or should start
 2 with, "Hi boss, are you all right?"
 3 (Audio played to the inquiry)
 4 Just two points of information. First of all, Leo,
 5 as we saw on the transcript, is in fact, I believe,
 6 a reference to Superintendent, as he then was, Leor
 7 Giladi?
 8 A. That's right, yes.
 9 Q. So secondly, TfGM, Transport for Greater Manchester?
 10 A. Yes.
 11 Q. Two issues I would like to you help us with arising out
 12 of that, as you've said. First or first meaningful
 13 contact with the ground--assigned tactical firearms
 14 commander. First, you agreed with me earlier that you
 15 did have a responsibility to review the declaration of
 16 Plato. You weren't the only person, I acknowledge, with
 17 that responsibility, but you held it in part. You
 18 explained this was the first opportunity for that review
 19 to take place by you and here, of course, you were being
 20 told, "It's starting to settle down". Did you at this
 21 stage, or shortly afterwards, review the appropriateness
 22 of Operation Plato continuing?
 23 A. Based on the information that Mark Dexter gave me, and
 24 he talks about somebody who's not in our control and the
 25 other information in the room, I didn't formally review

1 Plato at this point. But my assessment of the
 2 information -- when he said settle down, my
 3 interpretation of that would have been things are
 4 starting to settle at the arena in terms of evacuation
 5 and casualties, but that's not an interpretation of,
 6 "I have reviewed Plato". He's there, he's dealing with
 7 it, there's an ongoing threat, we've got somebody out of
 8 our control. So in my head, this was still a Plato
 9 response based on what we knew at that point.
 10 Q. I believe I've understood that there was no formal
 11 review, which no doubt is why we don't see it documented
 12 anywhere?
 13 A. Yes.
 14 Q. But your assessment, based upon what you were being told
 15 and learning from the room, was that the continuation of
 16 Operation Plato was appropriate?
 17 A. Yes, based on what I was being told there, and equally,
 18 the fact that, again, my thought process was
 19 pre-planned, premeditated attack, with a sophisticated
 20 device, as this was, had caused trauma and significant
 21 injury and death, that this was not something that was
 22 going to be resolved quickly in terms of mitigating the
 23 threat that that presented in my mind.
 24 Q. Along the way of your answer, you mentioned someone
 25 else. I think that's a reference to the fact that, at

1 23.16, a concern had developed about another individual.
 2 A. Yes. There were several bits of information in the
 3 room, because I believed Rachel Buckle and
 4 Craig Thompson were both there at this time as well, in
 5 the actual room at this point, so I think Mark alludes
 6 to the fact that they are coming in. My understanding
 7 was they were both there.
 8 Q. Chief Inspector Buckle certainly was there. I would
 9 need to check in relation to (overspeaking).
 10 A. I believe Mr Thompson was there as well. So yes,
 11 there's a lot of information at this point coupled with
 12 my view of the attack itself and the nature I understood
 13 to be and threat level.
 14 Q. Did you have, I am still on the first point I'm wanting
 15 to explore, situational awareness yourself at this
 16 stage?
 17 A. In respect of what was happening at that scene?
 18 Q. Well, situational awareness sufficient for you to make
 19 informed decisions.
 20 A. I had enough information to know that there was huge
 21 uncertainty amongst the commanders and those around me
 22 of the information that was present, either on the log
 23 or in the room, or happening. So I had that much
 24 situational awareness. Could I decipher that awareness
 25 into a constructive and considered threat assessment?

1 No.
 2 Q. The second issue arising out of that call. Was it
 3 apparent to you that, given what was unfolding at the
 4 arena, the Fire and Rescue Service had a part to play?
 5 A. Yes.
 6 Q. And to your mind, as of the night of 22 May, what was
 7 that part that the Fire and Rescue Service had to play?
 8 A. They are part of our joint multi-agency response to the
 9 scene. They have a part to play in casualty treatment
 10 and casualty evacuation and that's my understanding.
 11 They have specialist functions within their department
 12 as well to deal with that.
 13 Q. Indeed. I don't know if everyone heard it, it seemed to
 14 me to be perfectly clear, I'm sure you've listened to it
 15 many times, but during the course of that call, you were
 16 told:
 17 "We've got no fire, you may as well -- we may as
 18 well but NWAS appear to be coping".
 19 What I'm going to focus on is, "We've got no fire".
 20 Do you agree that in context, that was plainly
 21 a reference to the Fire and Rescue Service?
 22 A. Yes.
 23 Q. And that what you were being told was that the Fire and
 24 Rescue Service were not there?
 25 A. I think in the context of the conversation because

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1 I didn't hear him say -- if he'd said, "I don't have
 2 Fire and Rescue Service here, can you get them here" --
 3 in the way that's said -- I accept he says, "There's no
 4 fire", but that didn't register with me in that call,
 5 in that conversation that the Fire Service were not
 6 present at the scene.
 7 Q. I'm going to give you an opportunity to give that
 8 explanation, rest assured. I just want to see if we can
 9 agree, now that you've listened to it and seen
 10 a transcript, what in fact he was seeking to communicate
 11 to you. I believe you're accepting that what he was
 12 seeking to communicate to you was that the Fire and
 13 Rescue Service were not there?
 14 A. Yes.
 15 Q. And this of course is almost exactly 70 minutes after
 16 the explosion?
 17 A. Yes.
 18 Q. The fact that the Fire and Rescue Service were not
 19 there, had it registered with you, would have been
 20 a matter of significance, do you agree?
 21 A. Yes, absolutely.
 22 Q. Because of the value that they could bring to bear?
 23 A. Yes.
 24 Q. Can you assist us at all with why it was that that did
 25 not register with you as a reference to the absence of

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1 the Fire and Rescue Service?
 2 A. As I said, the issue for me is these calls were being
 3 made from a very busy location. It is very clear in the
 4 transcript and clear on the audio, but to me, who's
 5 hearing a lot of information in a room, and when he
 6 says, "There's no fire", I don't know what the next
 7 conversation is, obviously it's me talking to him, but
 8 it did not connect with me that he was telling me that
 9 Fire and Rescue were not at the scene. Part of that --
 10 and again that's my recollection of the call, but if I'd
 11 heard it, I know I would have reacted to it.
 12 Q. Yes.
 13 A. If he'd said it differently as in, "They are not here
 14 and I need them", and also on the basis that, as we
 15 declared Operation Plato, I was working on the
 16 presumption that fire had been notified and therefore
 17 would be in attendance, bearing in mind the timing of
 18 this actual conversation. That's the reason why
 19 I didn't respond to that particular issue as it was
 20 raised to me in that context.
 21 Q. So is it fair to summarise your position in this way: it
 22 didn't register because there was a lot going on --
 23 A. Mm.
 24 Q. -- because he didn't specifically refer to the Fire and
 25 Rescue Service or to fire engines or something very

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1 specific, and, moreover, you were operating on the
 2 assumption that Fire and Rescue Service would have been
 3 told --
 4 A. Yes.
 5 Q. -- and therefore would have attended?
 6 A. Yes, and because NWAS tactical were in the room with us
 7 and that's another route by which this might have been
 8 raised, it just did not --
 9 SIR JOHN SAUNDERS: Can you say that again, they weren't
 10 in the room?
 11 A. The NWAS tactical commander was in the room as well so
 12 again, if there'd been an issue, if I'd heard that
 13 differently, because I was kind of aware there was
 14 a problem, but I wasn't, it may have registered with me.
 15 I'm not going to say I thought he meant there's no fire
 16 as in a fire, I just did not hear that part of the
 17 conversation.
 18 MR GREANEY: You've been very clear in your answer. But at
 19 that time, I fully acknowledge that NWAS were there and
 20 they had people on the ground, therefore people with
 21 situational awareness, but at that stage, I believe the
 22 position is that there was no one from the Fire and
 23 Rescue Service at force headquarters in your command
 24 suite.
 25 A. That's probably the case, yes.

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1 SIR JOHN SAUNDERS: We know when Lawlor turned up, do we?
 2 MR GREANEY: Yes, I think it's 00.04 or 00.05. At all
 3 events, it's a short time gone midnight.
 4 I think I know the answer to this, indeed I'm sure
 5 I do, but with the reference to "no fire" and no one
 6 from the Fire and Rescue Service within the command
 7 suite, did you put those two things together or begin
 8 to?
 9 A. No. Again, I didn't hear the comment from Mark Dexter,
 10 it didn't register with me. There was a lot going on
 11 in that 30-minute period between half 11 and midnight
 12 with me briefing other people. And whilst I had an
 13 awareness that the room was filling up with people,
 14 in that kind of first 2 hours there was a lot of people
 15 arrived. I know Fire and Rescue were in the room at
 16 some point -- I think you have just said it was after
 17 midnight, Mr Greaney -- but at that moment in that call,
 18 subsequent to Mark Dexter saying that comment which
 19 I didn't hear, I wasn't aware.
 20 Q. I'm not going to challenge your suggestion that you
 21 didn't hear, nor am I going to diminish what was going
 22 on at the time. But can we agree at least that it is
 23 unfortunate that you didn't register that comment?
 24 A. Yes, absolutely.
 25 Q. Because if you had, you would have done something to

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1 find out what was going on?
 2 A. I would have rectified it, yes, and I would have made
 3 contact with them myself.
 4 Q. By "them", do you mean the Fire and Rescue Service?
 5 A. Yes.
 6 Q. And by rectify, do you mean you would have asked them
 7 where they were?
 8 A. Yes, I would have made contact and found out where they
 9 were and why they weren't at the scene.
 10 Q. There are just a small number of issues that I want to
 11 address with you before we carry on with the chronology,
 12 and it's really just to pick up on some points that the
 13 policing experts have made and to which you responded in
 14 your second statement.
 15 First of all, we touched on this earlier, but do you
 16 agree that often the Gold and Silver command rooms would
 17 be set up in separate locations?
 18 A. Yes.
 19 Q. Where they are set up in separate locations, what would
 20 be the rationale for that as opposed to them being in
 21 the same location?
 22 A. It's because, as in the majority of things we do, they
 23 are pre-planned operations and Silver should be allowed
 24 to carry out their tactical command separate from having
 25 the Gold commander in the room, and the Gold commander

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1 should be separate from that particular command module.
 2 That's in pre-planned events.
 3 Q. Why is it different in a spontaneous event? Because
 4 equally, in that situation, it's important that the
 5 strategy should be being devised and that separately,
 6 albeit connectedly from that, the tactical plan putting
 7 the strategy into place is being devised. Is it not
 8 best, even in a spontaneous situation, to have the two
 9 separately located?
 10 A. It might be in some situations, bearing in mind we do
 11 not often call major incidents. And I think that's
 12 an important difference. We're good at dealing with
 13 critical incidents, we respond to critical incidents
 14 a lot, but the necessity in a major incident to
 15 co-locate Gold and Silver is not tried and tested in my
 16 experience personally. It felt entirely appropriate on
 17 the night given the fact that there was so much
 18 information, so many views, so much on the log, that to
 19 separate that out, it would have drawn me away from the
 20 ability to have that communication in the room and
 21 understand if there were issues from other agencies,
 22 issues for my own staff in terms of the tactical command
 23 of the firearms operation, the tactical command room and
 24 Mark Dexter at that scene. To separate them out would
 25 have left me isolated from all the information that was

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1 coming into that location.
 2 SIR JOHN SAUNDERS: Can I just go back on one thing: one of
 3 the main points about having a Silver control room is
 4 you have all people co-located --
 5 A. Yes.
 6 SIR JOHN SAUNDERS: -- NWAS, fire and GMP. You have lots of
 7 people in that room. At the height of it, how many
 8 people roughly were in that room?
 9 A. Probably 80 to 100 at one point.
 10 SIR JOHN SAUNDERS: And they're mainly whom?
 11 A. It's a combination of the operations module, so the
 12 communications (overspeaking) --
 13 SIR JOHN SAUNDERS: -- answer the phone?
 14 A. Yes. The radio channel operators. The
 15 Silver commander. You've got all the agencies in there
 16 across the kind of Greater Manchester Resilience Forum.
 17 So AGMA, everybody else who's arriving, Manchester City
 18 Council, the voluntary sector staff will come in there.
 19 You've got the obvious people from the tri-service side,
 20 British Transport Police, a place for CT liaison.
 21 SIR JOHN SAUNDERS: Okay. I think British Transport Police
 22 didn't arrive until quite late.
 23 A. Probably... It was Sue Peters from BTP. I don't know
 24 the timing.
 25 MR GREANEY: I can't bring to mind the time either.

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1 SIR JOHN SAUNDERS: Okay. She came a long way, I do
 2 remember that.
 3 A. That was the ACC, sir. Sue Peters was a superintendent,
 4 probably a chief inspector at the time, who deployed
 5 from Merseyside.
 6 Again, you've got the communications staff in there
 7 as well, so on the tactical side, and then you've got on
 8 the Gold side, the strategic command side, Gold support.
 9 We had the RICC, which is the coordination centre for
 10 mobilising national assets in there.
 11 SIR JOHN SAUNDERS: Okay. A lot of people?
 12 A. Yes, a lot of people.
 13 SIR JOHN SAUNDERS: You've certainly got people who can help
 14 you out with things to support you.
 15 A. Yes.
 16 SIR JOHN SAUNDERS: I just wonder, bearing in mind having
 17 certainly fire, ambulance and police there all together
 18 was so important, that you weren't having somebody
 19 ringing up fire saying, "Where are you"?
 20 A. Yes. Again, it's one of those things. If I'd been
 21 aware of it at the time, bearing in mind I was doing
 22 other things -- again, I would have expected from
 23 a tactical perspective, not wishing to shift it across,
 24 because it ultimately sits with me, is that it would
 25 have been identified that Fire and Rescue Service were

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1 not there in the room in the early part of that.
 2 SIR JOHN SAUNDERS: So you were simply not aware they
 3 weren't there?
 4 A. No.
 5 MR GREANEY: When did you become aware that the Fire and
 6 Rescue Service had not arrived for 2 hours and
 7 6 minutes?
 8 A. In the afternoon of the 23rd. I knew they were in the
 9 room with us at some point, as I think we've
 10 established, just after midnight, but I didn't know they
 11 had not actually got to the scene for that length of
 12 time until I was told later in that day.
 13 Q. Mr Lawlor was there in the room for over half an hour
 14 before his appliances turned up. Do you remember having
 15 any discussion with him about the role that they were
 16 playing or not playing?
 17 A. No. I would have expected that conversation to take
 18 place between the tactical commanders.
 19 Q. And then later, the chief fire officer, Peter O'Reilly,
 20 turned up and was present at the SCG. Did you ever have
 21 a discussion with him about what role his service had
 22 played --
 23 A. No.
 24 Q. -- or not played?
 25 A. No. And he didn't mention it at the SCG.

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1 SIR JOHN SAUNDERS: Were you aware of him coming, arriving?
 2 A. I don't know when he arrived in the room, sir. I know
 3 he was at SCG.
 4 MR GREANEY: At 2 o'clock, I think.
 5 SIR JOHN SAUNDERS: At the moment of his arrival, were you
 6 aware of him being there?
 7 A. If he arrived at 2 o'clock I was probably OS [REDACTED]
 8 OS [REDACTED].
 9 MR GREANEY: If we had been in that room or if there'd been
 10 a recording of it, would we be presented with
 11 a situation of clear organisation or would he have been
 12 presented with a situation in which there was a lot
 13 going on or even a situation of chaos?
 14 A. I wouldn't describe it as chaos, I would describe it as
 15 very busy, but I think the -- each agency was operating
 16 in its own function within that room. So there's
 17 a piece for me around how that cross-communication could
 18 be made better in that room in the absence of having
 19 formal meetings, which is where the round-the-room
 20 situational kind of updates that Chris Hill perhaps
 21 talked to yesterday should happen.
 22 The most important part for me is, in this
 23 situation, which was so spontaneous and so fast-moving
 24 and so dynamic, actually having people together with the
 25 ability to say, "I have not got what I need", or,

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1 "We are not where we should be", was my primary
 2 objective because trying to bring order to potentially
 3 what you're describing as chaos, there's things
 4 happening in isolation and there needed to be that kind
 5 of cross-pollination of information shared across.
 6 But equally the bit for me is where, if you have
 7 a problem, you have the opportunity to ask. There were
 8 many, many commanders in that room.
 9 Q. And that sounds like a very good idea that there should
 10 be cross-pollination of information. That is what
 11 you -- and you were in charge of this room, were you
 12 not?
 13 A. I was in charge of the operation, yes. But the tactical
 14 command is the tactical command suite, and I've got
 15 responsibility at the strategic side, but it was all
 16 together so, yes.
 17 Q. That cross-pollination is what you wanted to achieve?
 18 A. Yes.
 19 Q. And does it therefore surprise you that you didn't at
 20 anything like a relevant time find out that the Fire and
 21 Rescue Service didn't turn up until gone half past
 22 midnight?
 23 A. Yes.
 24 Q. Did you find out at a relevant time that, in terms of
 25 NWAS staff, the maximum number that were in there was

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1 one advanced paramedic and two members of the Hazardous
 2 Area Response Team?
 3 A. No. The information I had was that, certainly from --
 4 I think it was via Mike Smith via my staff officer --
 5 that the casualties had been evacuated and Mark Dexter's
 6 update to me was that NWAS were coping. I was working
 7 on that basis at that point.
 8 Q. You certainly were told that NWAS were coping. But is
 9 it a matter of surprise for you, just as it's a matter
 10 of surprise that you didn't find out about the Fire and
 11 Rescue Service, that you didn't that night discover that
 12 there had been that number as opposed to a greater
 13 number of NWAS staff actually in the City Room?
 14 A. I think it's a surprise to me after the event. But the
 15 time at which those staff should have been in there was
 16 probably the time before I was actually in a position to
 17 have that understanding or that command and control. So
 18 it surprises me that I didn't know fire were there but
 19 I would have expected them to in there.
 20 Q. I'm going to finish off the issue of Gold and Silver
 21 being co-located, to use a term from a different
 22 context, albeit a connected one.
 23 When you dispatched Superintendent Nawaz to force
 24 headquarters to set up the Gold and Silver rooms, did
 25 you direct him that he should set them up in the same

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1 place?
 2 A. No, I didn't give that instruction.
 3 Q. Was it your anticipation that he would do so?
 4 A. They're side by side anyway so, yes, I didn't say to
 5 him, "Leave the rooms open so we can have that
 6 cross-communication", I just said, "Set them up", which
 7 would involve getting the room manager to set the room
 8 up.
 9 Q. In any event, your view, having had the experience,
 10 is that it was positive that they were located together
 11 in that way?
 12 A. Yes.
 13 Q. The second issue. Silver, by which I mean Mr Nawaz for
 14 current purposes, did not go to the scene.
 15 A. Yes.
 16 Q. Do you accept that the major incident plan appears to
 17 anticipate that Silver will go to the scene?
 18 A. Yes, in certain circumstances.
 19 Q. Well, does it anticipate that there are circumstances in
 20 which Silver won't go to the scene?
 21 A. I think there's an element of discretion in there as to
 22 when it's appropriate for a Silver commander to attend
 23 a scene or not.
 24 Q. That may be right. Would it be right to say that the
 25 general expectation one takes from the major incident

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1 plan is that Silver goes to the scene?
 2 A. Again, I think it's down to the discretion of either the
 3 person making the decision at the time or me as the
 4 Gold commander.
 5 Q. Do you accept the suggestion that Superintendent Nawaz
 6 should have been sent to the scene?
 7 A. No, I don't, and I've given this lots and lots of
 8 thought over the last few years and obviously ahead of
 9 the inquiry. Again, it's down to individuals' views as
 10 to how this works, but if we've got an Operation Plato
 11 declaration and we are working on the presumption that
 12 we have a marauding terrorist firearms attack ongoing,
 13 I have explained earlier my view about the on-scene
 14 commander role and how that sits and that can be in the
 15 absence of a TFC at the scene. As JOPs says, that will
 16 be potentially a non-firearms commander undertaking that
 17 role. Because of the situation we had, we had the
 18 potential for more scenes, because we were anticipating
 19 more attacks to take place based on the fact that there
 20 was information -- the circumstances, the type of
 21 attack.
 22 If Arif Nawaz had gone to the scene as well, the
 23 ability to have a Silver commander remote from what
 24 effectively is the first scene, I believe would have
 25 caused problems. If there'd been multiple site attacks,

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1 and thankfully there weren't, you have your police
 2 on-scene commander and the force Silver commander at one
 3 location. So for me, the police on-scene commander
 4 function is really important and I know there's
 5 a difference between Mr Dexter's view and my view as to
 6 how that was undertaken.
 7 Q. There is, yes.
 8 A. But if that's (inaudible: distorted) interpret it, he
 9 has the ability at the scene to act as the tactical
 10 commander, to do the risk assessment, to hold the JESIP
 11 huddles, develop the FCP, which I think he did.
 12 If the Silver commander goes to that scene, who's
 13 going to be in overall tactical command and be
 14 considering the wider issues of the major incident plan
 15 and subsequent activity?
 16 Q. I know you feel strongly about this. You mustn't
 17 apologise, it's just going a little fast again, but
 18 I have understood what you have said. I don't want to
 19 go over all the ground that we've been over about
 20 whether Chief Inspector Dexter should have been told
 21 what the expectation was.
 22 SIR JOHN SAUNDERS: I think you just owe the transcribers
 23 something of an apology at the end of the afternoon.
 24 A. Sorry, sir, yes.
 25 MR GREANEY: Superintendent Nawaz explained to us that he

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1 could have been at the scene or the FCP within a short
 2 time and by 11 pm.
 3 A. Mm.
 4 Q. In the result , even accepting everything you say for the
 5 time being about Chief Inspector Dexter, he wasn't there
 6 in the sense of being just outside until 11.23.
 7 A. Mm—hm.
 8 Q. So even on your basis, wasn't there a void in terms of
 9 Silver command at the scene for a period that was not
 10 acceptable?
 11 A. There was, but as I say, you can fill that void by
 12 identifying an on—scene commander in the form of an
 13 inspector, for example Mr Smith or Mr Cooklynn or
 14 somebody else. But I accept that in the absence of
 15 Mr Dexter at the scene, that void could have been filled
 16 by Mr Nawaz. However, if this had then developed into
 17 a marauding attack with further sites, that would have
 18 caused problems for us.
 19 SIR JOHN SAUNDERS: So was that void filled by an on—site
 20 inspector, as you understand it?
 21 A. It doesn't appear to have been in the sense of —
 22 SIR JOHN SAUNDERS: That's the gap as far as you are
 23 concerned?
 24 A. The gap nor me is the force duty officer saying directly
 25 to a supervisor, "Mike Smith would have been great to do

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1 that", "Mike you are the on—scene commander, this is
 2 what you need to do", and I translate that back to — we
 3 all need to then brief our commanders to say what we
 4 expect them to do and are they clear on their roles is
 5 the issue, sir .
 6 MR GREANEY: You answered what was going to be my next
 7 question, namely whose job was it in that void to put
 8 something in place, and I think you said it was the
 9 FDO's job?
 10 A. In that initial response, yes.
 11 Q. Thank you for dealing with those couple of aspects.
 12 We'll now return to the chronology —
 13 SIR JOHN SAUNDERS: Is it convenient for me to ask something
 14 of an overall figure about the Silver control room?
 15 MR GREANEY: By all means.
 16 SIR JOHN SAUNDERS: This is not meant to be in any way
 17 a pejorative remark, but I just want you to say to me,
 18 bearing in mind that you said in the initial stages of
 19 the Silver control room being set up that it was very
 20 much a ground—up operation, operated from the scene.
 21 A. Yes.
 22 SIR JOHN SAUNDERS: Bearing in mind it takes some time to
 23 set up the Silver room, so we are well into by the time
 24 that has happened, and bearing in mind, certainly from
 25 what we know about the fire, there wasn't really

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1 complete coordination between the various agencies.
 2 What in your view did the Silver control room achieve
 3 that night? As I say, it 's not meant to be pejorative.
 4 It 's to give you the opportunity to say — I know
 5 there's a lot of activity , I know you're working very
 6 hard, but what did it actually contribute?
 7 A. I think the main purpose of it was to take away the
 8 pressure from the force duty officer because by doing
 9 that, you haven't got one person sitting there. It
 10 brings together, that co—location and that ability to
 11 communicate. It didn't do that particularly well on the
 12 night, I accept, sir .
 13 SIR JOHN SAUNDERS: I'm talking about the night. What it
 14 achieved on the night.
 15 A. Absolutely. It did allow us to put in place the
 16 additional plans that kind of follow this, the
 17 consequence management, the kind of issues with the
 18 local authority .
 19 SIR JOHN SAUNDERS: So the follow—up, which is obviously
 20 important and I am not (overspeaking) —
 21 A. It is the phasing(?) piece, isn't it? So there's the
 22 initial response, which just happens, and then there's
 23 the piece which says: actually, what has to happen next?
 24 How do we bring the mass fatalities group together? How
 25 do we put the structures in place? How do we determine

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1 from what has happened what needs to happen next in
 2 terms of infrastructure , the transport network, all of
 3 those things? Because obviously the event at the arena
 4 had significant consequences in terms of victims and the
 5 families , but equally, Manchester itself was at
 6 a standstill , the infrastructure was shut down, the
 7 whole network and the whole city centre, so that's when
 8 the TCG element starts to come into its own around what
 9 needs to happen next.
 10 SIR JOHN SAUNDERS: In terms of coordinating what went on as
 11 a response to the actual attack, it really didn't do
 12 much?
 13 A. No.
 14 SIR JOHN SAUNDERS: Thank you.
 15 MR GREANEY: In terms of what actually happened on the
 16 ground and in particular in the period, let 's say, from
 17 the explosion to 1 hour after the declaration of Plato,
 18 so we're at 11.47, did anything happen, either in the
 19 Gold command suite or in the Silver command suite that
 20 made any difference to what happened on the ground?
 21 A. In the actual response to as opposed to things that
 22 happened after?
 23 Q. Yes.
 24 A. Probably not, no.
 25 Q. We had just left you having that conversation with

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1 Chief Inspector Dexter. If we go back to your Gold
 2 book, {INQ029053/5}, we see what I think must be your
 3 note of what you were being told by Chief Inspector
 4 Dexter; do you agree?
 5 A. Yes.
 6 Q. We've listened to the recording so we don't need to look
 7 at that in any detail at all.
 8 SIR JOHN SAUNDERS: It's worth remarking perhaps no mention
 9 of fire. That remark you say you didn't hear.
 10 A. Yes.
 11 MR GREANEY: That's an accurate and fair observation, sir,
 12 I agree.
 13 If we go over the page to {INQ029053/6}, we have
 14 a heading. Does it read "WS/strategy"?
 15 A. Yes.
 16 Q. And does WS stand for "working strategy"?
 17 A. It does, yes.
 18 Q. So is this the first occasion upon which you documented
 19 your working strategy as Gold?
 20 A. Yes.
 21 Q. So this must therefore be at a time not before about
 22 11.45, do you agree?
 23 A. Yes, that's right.
 24 Q. Could you read out to us, please, what you have
 25 documented as your working strategy?

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1 A. Yes:
 2 "Protect the public from harm. Minimise the risk to
 3 the public. Maximise the safety of officers, staff,
 4 first responders. Provide information to victims and
 5 families that is accurate and up to date."
 6 Q. If it were to be suggested that this seems rather
 7 general, would that be a fair observation or not?
 8 A. Yes.
 9 Q. When you look back, should the strategy have been more
 10 specific or does this do the job?
 11 A. It does the job for me.
 12 SIR JOHN SAUNDERS: The difference between 1 and 2?
 13 A. Is that the second?
 14 SIR JOHN SAUNDERS: "Protect the public from harm",
 15 "Minimise the risk to the public", I just wonder what
 16 the difference between those two is.
 17 A. Not a great deal really, but protecting the public from
 18 further harm, that wider kind of threat and minimise the
 19 risk to the public, same kind of things, but again, I'm
 20 trying to remember...
 21 SIR JOHN SAUNDERS: No, no, don't worry, you're doing it on
 22 the spot.
 23 A. They're very similar in terms of what I've written.
 24 MR GREANEY: At about the same time, 11.45, you were
 25 approving the first press release, which Mr Ainsworth

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1 had drafted?
 2 A. Yes, Ashworth.
 3 Q. Now, by 11.45, the golden hour, as we have called it,
 4 was over.
 5 A. Yes.
 6 Q. And as the chairman established, the final living
 7 casualty had been evacuated from the City Room. Without
 8 seeking to diminish in any way what you did, we can,
 9 I believe, move through the following period more
 10 swiftly.
 11 At about the time at which you were speaking to
 12 Chief Inspector Dexter, your staff officer was receiving
 13 an update from Inspector Smith, the Bronze at the scene.
 14 A. Yes.
 15 Q. By 11.45, we know that Chief Inspector Buckle was
 16 present and I think she'd been there for a little time
 17 by then. She was the cadre TFC; is that correct?
 18 A. That's correct, yes.
 19 Q. By that stage, 11.45, Chief Inspector Sexton, or
 20 Inspector Sexton as he was, had been the initial
 21 tactical firearms commander for 70 minutes. So for
 22 a lengthy period?
 23 A. Yes.
 24 Q. And he had been performing that responsibility alongside
 25 his other duties?

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1 A. Yes.
 2 Q. It wasn't for another 30 minutes, by which I mean more
 3 than 30 minutes after we know that Chief Inspector
 4 Buckle, the cadre TFC was at force headquarters, that he
 5 was relieved as TFC, and then not by Chief Inspector
 6 Buckle but by Superintendent Thompson. Is that period
 7 of delay, I say that not in a critical way, is that
 8 period of delay in relieving him acceptable?
 9 A. The shortest amount of time for a handover is the best
 10 possible scenario. But in order to take command from an
 11 initial TFC, the incoming TFC needs to be in a position
 12 to do so. Mark Dexter had already -- was already
 13 arriving at scene, so in terms of the ITFC's need to
 14 manage the scene directly, he had a ground-assigned
 15 tactical firearms commander there, so that alleviates
 16 some pressure. I was aware that Rachel arrived at the
 17 same time as me.
 18 Q. Did she? Thank you.
 19 A. Yes, her and I arrived together.
 20 Q. So she was there in the command suite from about 11.20?
 21 A. Yes.
 22 Q. So that makes the period an even longer one?
 23 A. Yes. At some point in that -- from the point of me
 24 arriving, or whether it was in a conversation with
 25 Mark Dexter or the voicemail that he left, I was aware

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1 that they had had a discussion between them to agree
2 that Craig Thompson, who's a specialist TFC, would come
3 in and take that handover. Notwithstanding that,
4 getting the handover from Dale would have taken time to
5 do.

6 And I go back to, if he had rung me and needed to
7 brief me, it would have taken quite a substantial amount
8 of his time to brief me, which I reflect on as to why he
9 didn't contact me because probably he didn't have time
10 to do so.

11 I think Rachel and Mark Dexter and Craig Thompson
12 had agreed that Craig would be best placed so they
13 didn't want to double up on the handover.

14 Q. I just need to make sure I've understood this.

15 A. Sorry, that was a long answer.

16 Q. Not at all; what you said was comprehensive.

17 Chief Inspector Buckle was an entirely competent
18 tactical firearms commander?

19 A. Yes.

20 Q. She was there in the command suite by 11.20 or
21 thereabouts?

22 A. Yes.

23 Q. And yet it wasn't for almost another hour that the ITFC
24 was relieved. And by the stage he was relieved he had
25 been the ITFC for a period of approaching 1 hour and

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1 45 minutes, which was a long time given what else he had
2 to do. Do you agree?

3 A. Yes, it is.

4 Q. He could have been relieved that hour or nearly an hour
5 earlier. It was your decision, was it not, who should
6 perform which roles within the command structure?

7 A. Yes.

8 Q. Why was it preferable that there should be a delay
9 whilst Superintendent Thompson arrived and got up to
10 speed as opposed to the TFC becoming Rachel Buckle?

11 A. Because in terms of what Dale would be doing in terms of
12 managing the firearms assets and firearms deployment,
13 because we weren't dealing at that point with an active
14 shooter, and Mark Dexter had arrived at the scene,
15 he was managing the armed assets at the scene. So
16 you've already alleviated pressure from Dale Sexton
17 because, whilst he's the initial tactical firearms
18 commander and he had agreed a command protocol with
19 Mark Dexter, which was that Mark Dexter would take the
20 arena and Dale Sexton would take any of the wider
21 issues, there were other things happening. But in terms
22 of armed deployments and the need to apply firearms
23 command, there was not an awful lot going on apart
24 from -- and they were dealt with in the room, anyway.
25 So Rachel did deal with I think one incident.

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1 But it seemed appropriate to me, given the
2 specialism of Craig and the nature of this being Plato
3 and the potential for more attacks, that a specialist
4 TFC -- because he was available -- would take that.
5 I also think that Craig was in the room a lot sooner --
6 I think I've heard 23.50, I thought he was there and
7 therefore able to start to take that handover from Dale.
8 I am not sure of the times, though.

9 Q. I'm sure we can --

10 SIR JOHN SAUNDERS: At the time you are making your
11 decision, one factor you need is when is he going to be
12 here, how long is the delay going to be, to balance
13 against whether Chief Inspector Buckle does the job.

14 A. Yes. And again, I've got -- not trying to push the
15 responsibility -- three very experienced tactical
16 firearms commanders sorting this out amongst themselves
17 and having a conversation with Dale and I kind of
18 reflected on it and thought, well, should I have just
19 imposed it and said. It didn't feel right at the time,
20 but if I'd had a call with Dale, or he had notified me
21 that he was -- I accept, as well, we know the FDO will
22 be under pressure, so maybe I should have thought more
23 clearly about that and played that in. But unless Dale
24 is saying, "Please take this off me", and I have been in
25 situations before where the ITFC and the TFC don't

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1 necessarily want to hand over, either the initial wants
2 to keep it or the TFC is not ready -- I would also have
3 expected Dale to push that point as well if he was
4 really feeling it.

5 SIR JOHN SAUNDERS: He's not the sort of man to do that,
6 perhaps?

7 A. With respect, I would disagree. I've worked with Dale
8 before and I think --

9 SIR JOHN SAUNDERS: He would say if he was --

10 A. Force duty officers are very vocal and the firearms
11 cadre are very vocal about how they operate together in
12 a very healthy way. It's a very professional discussion
13 that takes place.

14 SIR JOHN SAUNDERS: To start with, he was expecting Chief
15 Inspector Buckle to take over.

16 MR GREANEY: He was.

17 A. Yes.

18 SIR JOHN SAUNDERS: And he said to her, "You take the time
19 you need to get yourself acquainted and then take over".

20 A. Yes.

21 SIR JOHN SAUNDERS: And then the next thing that happens is
22 it is not going to be her at all who does it, it's
23 Mr Thompson, so delay there.

24 I think from what we've heard from Mr Sexton, the
25 idea that the workload went down much when Mr Dexter

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1 took over at the scene didn't seem very apparent,
 2 I think, from the evidence.
 3 MR GREANEY: I think that's fair, sir.
 4 SIR JOHN SAUNDERS: The recording, did it go past when
 5 Mr Dexter --- that we heard?
 6 MR GREANEY: Yes. The recording lasts for more than
 7 2 hours.
 8 SIR JOHN SAUNDERS: And lasted until Mr Thompson took over?
 9 I think that's when we stopped. Did it sound like
 10 he was exactly relaxed?
 11 A. Not relaxed, no. Agin, in my head, bearing in mind Dale
 12 and myself and Rachel had the force to deal with,
 13 I wasn't aware there were other incidents ongoing that
 14 were taking time. If that was the case, and again this
 15 is not pushing the responsibility to Dale, it's
 16 something that as the strategic commander I should
 17 perhaps have asked him and maybe I should have gone
 18 straight to the FDO location if that was the case ---
 19 I don't agree with that either, sir, just to make that
 20 clear. I think there is something about whether it's
 21 a culture in our organisation that people don't put
 22 their hand up and say, "I need help", but my job is to
 23 resource.
 24 SIR JOHN SAUNDERS: That's what I was saying about
 25 Mr Sexton. He didn't actually, particularly when he

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1 responded to Chief Inspector Buckle ---
 2 A. He should have insisted and if there then a debate, that
 3 would have come to me, sir, for ---
 4 MR GREANEY: The position with the recording is we listened
 5 to the recording up to the appointment of
 6 Superintendent Thompson. The recording lasts for
 7 a considerable period longer. The evidence of Mr Sexton
 8 was that it was at that point, at about 00.15, that
 9 there was a big drop off in the burden upon him.
 10 SIR JOHN SAUNDERS: (Overspeaking) thank you for reminding
 11 me of that.
 12 MR GREANEY: I am just going to run through the rest of the
 13 chronology and if you think that I am going through
 14 anything too quickly, I'm sure you'll tell me.
 15 At 23.54, you spoke again to Chief Inspector Dexter.
 16 This is our line 8722. He called you on that occasion
 17 and made plain that a greater number of explosives dogs
 18 were needed at the scene.
 19 A. Yes.
 20 Q. And no doubt you understood the importance of getting
 21 explosives dogs there?
 22 A. Yes, I did.
 23 Q. He invited you to go to mutual aid, so to seek through
 24 channels to other forces. Did you do that?
 25 A. Yes, we did. I passed that out in the room.

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1 Q. At about midnight, as we've discussed,
 2 Superintendent Nawaz was replaced. He was replaced as
 3 Silver commander for the incident by
 4 Superintendent Hill; do you agree?
 5 A. Yes.
 6 Q. And was he also replaced as Night Silver by
 7 Superintendent Neil Evans?
 8 A. Yes, he was.
 9 Q. Was he effectively being sidelined?
 10 A. I wouldn't say sidelined. He was left in a support role
 11 with Chris Hill. But as I said earlier in my evidence,
 12 my confidence in Arif and the information I was being
 13 provided with and my awareness as I got to headquarters
 14 of his lack of understanding of Plato led me to believe
 15 it was best to replace him at that point, but bearing in
 16 mind he had been Silver for that period, it seemed
 17 sensible to leave him alongside Chris Hill.
 18 Q. That was, if I may say so, a very frank answer and you
 19 were there to make just those kind of decisions.
 20 But it seems from what you have said that the
 21 position had been reached in which not only did you lack
 22 confidence in him to be tactical commander for the
 23 incident, you even lacked confidence in him to perform
 24 the broader duty of Night Silver?
 25 A. Not lacking confidence in his ability to do the broader

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1 role, but he'd been involved in this incident for that
 2 previous period and I had the option of Chief
 3 Inspector Evans, because I think as the inquiry knows,
 4 lots of staff were either contacted or turned in. And
 5 again, from my perspective as the Gold, it was for me to
 6 determine who best sat in the command structure, so
 7 Neil Evans was a good choice for that. So sidelined is
 8 quite a harsh expression.
 9 Q. It is, yes.
 10 A. He was in that support role.
 11 Q. Well, he went from being Night Silver and then Silver
 12 for a terrorist attack to supporting another officer who
 13 was Night Silver.
 14 A. Who was tactical commander for the incident, not the
 15 Night Silver.
 16 Q. I see.
 17 SIR JOHN SAUNDERS: I think we heard it was Mr Thompson who
 18 called in Mr Evans.
 19 A. Mr Hill.
 20 SIR JOHN SAUNDERS: Sorry, that was Mr Hill. Thank you.
 21 A. Sorry, sir, not with my knowledge.
 22 MR GREANEY: At 00.03 hours you speak to Mark Dexter again.
 23 And this is our line 9020. You recall that he told you
 24 by that stage it was believed that the bomber had been
 25 alone. Was that another opportunity to review the

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1 continuation of Plato?
 2 A. Yes, it was.
 3 Q. Did you take that opportunity to review Plato?
 4 A. Again, not formally recorded but that was information
 5 coming from one scene and at this stage — and it is
 6 referred to in my statement — I was aware of other
 7 incidents ongoing. So whilst that was information to
 8 say the bomber appeared to be alone, that was my
 9 interpretation, so the act that had taken place in that
 10 scene was an individual that did not lead me to the
 11 conclusion that Plato should be withdrawn.
 12 Q. At 00.14 hours your staff officer made another note.
 13 Was the sergeant effectively alongside you throughout
 14 the whole of this incident?
 15 A. For the majority of it, yes.
 16 Q. And I just want to ask you about one aspect of this note
 17 to make sure I've correctly understood it. This is
 18 {INQ029052/3}.
 19 We can see towards the top left—hand corner, this is
 20 timed at 00.14 hours. So it can't, on the face of it,
 21 be a note before that time. A quarter of the way down
 22 on the left—hand side, "00.14 hours", alongside, "rapid
 23 shots fired".
 24 A. Yes, sorry, yes.
 25 Q. That's a reference to —

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1 A. Yes.
 2 Q. — a concern that developed about the hospital in
 3 Oldham, which turned out to be nothing?
 4 A. Yes.
 5 Q. Further down that page, we can see that there are three
 6 numbered points; do you see that?
 7 A. Yes.
 8 Q. Point 1 that has been noted by your staff officer is,
 9 I think:
 10 "Which partners know?"
 11 Can you see where I'm referring to?
 12 A. Yes, I can.
 13 Q. Do you agree that it reads, "Which partners know"?
 14 A. I agree it says that, yes.
 15 Q. This is nearly 1 hour and 45 minutes after the
 16 explosion. Would it be correct to read into this that
 17 you were still asking at that stage which of your
 18 emergency service partners knew, and if so, knew about
 19 what?
 20 A. It's difficult to say because I think Alison's notes,
 21 they're not taken as a direct consequence of me speaking
 22 to her and saying, "Make a note of this". So it's
 23 difficult for me to say if I'm still asking that
 24 question at that point. I'm going to struggle to answer
 25 that question, to be honest.

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1 Q. Then I won't press you.
 2 A. Because they are the same questions I asked when I first
 3 arrived.
 4 Q. Yes.
 5 A. Yes.
 6 Q. And you'll appreciate the point I was asking you to
 7 comment on.
 8 A. Yes.
 9 Q. Is the fact that you were still asking them a good deal
 10 later something that ought to be of concern for us?
 11 At 00.22 hours, you spoke to Chief Inspector Dexter
 12 again. We will listen to this. It's less than
 13 3 minutes. We'll have on screen at the same time the
 14 transcript. This is our line 9551.
 15 Mr Lopez, would you play, please, {INQ025479A/1}
 16 from counter time 55:44 to 57:32, and have on screen at
 17 the same time the transcript, {INQ025409T/37}.
 18 (Audio played to the inquiry)
 19 I'm certain that what I want to ask you about will
 20 be clear to you. We see in that conversation at
 21 00.22 hours, and hear in that conversation, a reference
 22 to zones, do we not?
 23 A. Yes.
 24 Q. Was that the time, 00.22 hours, at which you had your
 25 first conversation with anyone in which there was an

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1 express reference to zones?
 2 A. Yes, that's right.
 3 Q. In the period that followed, did you establish an air
 4 exclusion zone?
 5 A. Yes.
 6 Q. Work together with the media team?
 7 A. Yes.
 8 Q. And liaise with others within the command suite?
 9 A. Yes.
 10 Q. I'm next going to ask you a series of questions that
 11 I've been invited to pose for good reason by advocates
 12 representing the families. I know you'll wish to help
 13 in response.
 14 The first question I have been asked to raise by
 15 Mr Atkinson, and I hope that I've accurately understood
 16 the point.
 17 What is a casualty bureau?
 18 A. Casualty bureau is a mechanism by which we can establish
 19 a single point of contact, an 0800 number, so when
 20 there's a major incident or an international incident,
 21 we are able to quickly get that out to the public with
 22 a view to them being able to contact that number,
 23 provide details of people that they may be concerned
 24 about who are missing, or receive information if they
 25 need to know where to go or what to do in the event of

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1 an attack such as this.
 2 Q. Did I understand your evidence correctly earlier that
 3 this idea of providing information to those who are
 4 going to be desperate for information was something that
 5 you regarded as important and that you regarded as
 6 a learning point from 7/7?
 7 A. Yes, absolutely. We were told on the MAGIC course very
 8 clearly the issues that had affected all the families
 9 involved then, and as I said, my initial thoughts went
 10 back to that and I was very, very keen that we had the
 11 casualty bureau up and running. I think I actioned it
 12 probably on arrival at HQ.
 13 Q. The major incident plan, {INQ007279/79} for the
 14 transcript, indicates that it was your responsibility as
 15 ACC to authorise a casualty bureau.
 16 A. Yes.
 17 Q. And did you authorise a casualty bureau?
 18 A. I requested it so, yes, that was my authority.
 19 Q. Some of the bereaved families have described
 20 experiencing, to say the least, very real frustration
 21 about getting information about their loved ones and
 22 having to wait a long time before doing so. And that,
 23 from what you said, is the very opposite of what you
 24 wanted to achieve that night?
 25 A. Yes, that's correct. For exactly that reason.

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1 Q. Do you know why that occurred, why there were delays?
 2 A. I do now. I think it was clearly set out in the
 3 Kerslake Arena Review as to what the issues were on the
 4 night.
 5 Q. Could you summarise what you understand them to have
 6 been?
 7 A. There was a failure in the technology at Vodafone in
 8 terms of setting up the NMAT system and that did not get
 9 resolved for some time. I didn't see all of
 10 Chris Hill's evidence yesterday but I think he said
 11 a substantial amount of his time was spent trying to
 12 resolve those issues, so it was a technological failure
 13 from Vodafone. The detail is in the Kerslake Review but
 14 there was definitely a technology issue.
 15 Q. So that was a consequence of a failure by that
 16 organisation not GMP?
 17 A. I think that was the finding of Kerslake, yes.
 18 Q. Whilst I'm dealing with matters that resulted in
 19 learning, Mr Cooper's invited me to --
 20 SIR JOHN SAUNDERS: Before we leave that, I think other
 21 numbers were provided by GMP and there was difficulty
 22 getting through to those numbers as well. They were
 23 given as alternatives but that didn't work that well.
 24 A. Absolutely, sir. That's the reason why the casualty
 25 bureau number is so important because if you set up the

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1 0161 number that we provided, I don't say this lightly,
 2 it's a bit like trying to ring the force duty officer
 3 and you don't have that mechanism and structure of
 4 a casualty bureau that can take the questions from
 5 concerned families, which is the whole point of
 6 a casualty bureau.
 7 MR GREANEY: As I was indicating, Mr Cooper has invited me
 8 to raise a particular issue with you that you can
 9 assist.
 10 The Westminster Bridge attack occurred on 22 March,
 11 so two calendar months ahead of the Manchester attack.
 12 Did you personally learn anything about the response to
 13 a terrorist attack from what had happened, by which
 14 I mean had you learnt anything between 22 March and
 15 22 May?
 16 A. In terms of was I aware of any of the formal learning or
 17 any of the hot debrief issues, no, I wasn't. The thing
 18 I'd say about the Westminster Bridge attack was, in
 19 terms of the context of the threat level to the UK and
 20 my understanding of that kind of concern, it was in my
 21 mind that we had had a previous terrorist attack in the
 22 previous 2 months, albeit the circumstances of the
 23 attack were very different and the methodology, but it
 24 did -- so there was no learning for me directly, but an
 25 awareness of that incident was on my mind on that night

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1 as well.
 2 I don't think there was anything available, if I'm
 3 perfectly honest, in that first period.
 4 Q. You have probably answered the specific question that
 5 I was asked to pose, which was whether anything about
 6 that incident caused you to have any particular
 7 reflections about either JESIP or Plato.
 8 A. No, because I wasn't aware of any of the circumstances
 9 or the debrief issues.
 10 Q. In terms of what is or may be important for the
 11 inquiry's learning I'm going to take you back to the
 12 chronology and to a particular time, 01.16 hours. This
 13 is 2 hours and 45 minutes precisely after the explosion.
 14 That is when you spoke to Assistant Chief Constable
 15 Robin Smith of BTP, who was BTP Gold.
 16 A. Yes.
 17 Q. I'm now at paragraphs 115 to 117 of your witness
 18 statement. The inquiry has heard a good deal of
 19 evidence about the concepts, the connected concepts of
 20 jurisdiction and primacy. From your point of view in
 21 May 2017, with whom did primacy for policing at the
 22 arena in general terms rest?
 23 A. I was aware afterwards it was BTP, but at the time
 24 I wasn't aware that BTP had responsibility for the
 25 arena.

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1 Q. You weren't?
 2 A. No, I wasn't.
 3 Q. So this I hadn't understood. You understood that the
 4 arena existed within Manchester?
 5 A. I did, yes.
 6 Q. Had you ever visited it yourself?
 7 A. No, I'd passed through Victoria Station and I'd been up
 8 the steps to the thing, but I hadn't been to an event
 9 at the arena.
 10 Q. So you knew that it was physically connected with --
 11 A. I did, yes.
 12 Q. -- the railway station? But you weren't aware that it
 13 was an area that the British Transport Police had
 14 responsibility for policing?
 15 A. No.
 16 Q. Who did you think had the responsibility for policing --
 17 A. I thought it was GMP.
 18 Q. What impact did that have on the night on the decisions
 19 that were made, if any?
 20 A. For me, nothing, because from the outset of taking the
 21 phone call from Arif Nawaz I worked on the premise that
 22 the arena was GMP's and we had to respond to that
 23 incident.
 24 Q. So at all stages from 22.52 until this call at 01.16,
 25 you considered this was GMP's policing responsibility?

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1 A. Yes.
 2 Q. And that they had primacy?
 3 A. Yes, I thought I was responsible for it.
 4 Q. What occurred during your discussion with Assistant
 5 Chief Constable Smith?
 6 A. It had been brought to my attention, either through
 7 conversation with Denise Worth or Mark Dexter or via
 8 somebody in the Silver room, that at the scene there was
 9 a discussion ongoing about who was responsible for the
 10 actual scene management. And I understood from that --
 11 I knew BTP were there, but I'd assumed BTP were there
 12 because they were in Victoria Station and then responded
 13 in numbers.
 14 But the discussion I had in the room was there
 15 appeared to be an issue about who was going to manage
 16 the scene and --
 17 SIR JOHN SAUNDERS: This is for the purposes of further
 18 criminal investigation?
 19 A. Yes, sir.
 20 SIR JOHN SAUNDERS: Thank you.
 21 A. And the scene management, the disaster victim
 22 identification process, because of course BTP have all
 23 of those facilities.
 24 The conversation with Mr Smith was to clarify that
 25 point and that was the first kind of time I understood

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1 that BTP had some responsibility for the arena.
 2 MR GREANEY: But did you make plain in that conversation
 3 that primacy not only for the incident but for the
 4 investigation rested with GMP?
 5 A. Yes, very much so, and that CT would be leading on the
 6 subsequent activity at the scene, so we were responsible
 7 as GMP for securing the scene, initiating process in
 8 terms of DVI particularly, but we were doing that in
 9 conjunction with CT Policing, who would be leading later
 10 on.
 11 Q. I said GMP. In fact formally it will be the North-west
 12 Counter-terrorism Unit that would be conducting the
 13 investigation.
 14 Have you listened to the dictaphone recording, the
 15 very lengthy, more than 4-hour recording, of
 16 Chief Inspector Dexter?
 17 A. Not all of it, no.
 18 Q. At 01.22 hours, you made a further call to
 19 Chief Inspector Dexter following hot on the tail of the
 20 conversation you'd had with BTP.
 21 A. Mm-hm.
 22 Q. And in that conversation, it's line 10425, there was
 23 further discussion about zones with Mr Dexter,
 24 indicating to you that once the arena bowl had been
 25 searched, he was going to call it a cold zone after

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1 that. Do you remember that conversation?
 2 A. Yes, I do.
 3 Q. And you also made clear to him that you had just spoken
 4 to the ACC from BTP and that it was your scene?
 5 A. Yes.
 6 Q. Thereafter, and of course --
 7 SIR JOHN SAUNDERS: Sorry, just before you go on. There was
 8 someone from BTP in the room, an officer from Liverpool?
 9 A. Yes, that's right.
 10 SIR JOHN SAUNDERS: What did you think she was doing there?
 11 A. To be fair, sir, I'm not quite sure that Sue had arrived
 12 at that point.
 13 SIR JOHN SAUNDERS: I'm afraid I don't have that on --
 14 A. In my head I think she might have arrived at 1.30, but
 15 I don't know why I think I know that.
 16 MR JAMIESON: She puts her arrival at quarter to midnight,
 17 00.45, and the reference for that is INQ00 --
 18 SIR JOHN SAUNDERS: Quarter to 1.
 19 MR JAMIESON: 00.45.
 20 SIR JOHN SAUNDERS: Thank you very much for that,
 21 Mr Jamieson.
 22 MR JAMIESON: Not at all.
 23 MR GREANEY: The chairman's point is a good one: there is
 24 someone there from BTP for about half an hour before you
 25 speak to the ACC from BTP. Did you register that that

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1 person was there in the room?
 2 A. Probably not. It may have been Sue if that's the case
 3 who raised the issue to Silver or that's how I became
 4 aware of it, but the conversation I had was with the
 5 ACC.
 6 Q. In all events, what we know though, as do all who have
 7 listened to the dictaphone recording, is you were clear
 8 with Chief Inspector Dexter that it was GMP's scene?
 9 A. Yes.
 10 Q. And you may not know, I do, a number of officers were to
 11 approach him in a period that followed, uncertain as to
 12 whose scene it was and he was able to put them right.
 13 A. Right, okay.
 14 Q. Just to really start to draw things to a conclusion,
 15 thereafter, so after 1.22 am, you were involved in
 16 liaising with the senior investigating officer?
 17 A. I'd spoken to Denise probably in the first half hour,
 18 but yes.
 19 Q. You liaised with the head of the North—west
 20 Counter—terrorism Unit, Mr Jackson?
 21 A. On a few occasions yes.
 22 Q. You were involved in the appointment of family liaison
 23 officers?
 24 A. Yes.
 25 Q. And at about 2.35 am, you took part in a video

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1 conference with the senior national coordinator,
 2 Neil Basu?
 3 A. I did, yes.
 4 Q. At 04.15 hours, the first strategic coordinating group
 5 meeting took place, did it not?
 6 A. Yes, it did.
 7 Q. To say the least, it had been your aim that that meeting
 8 should take place much earlier?
 9 A. Yes, I think the notes reflect that it was a request
 10 when I first arrived, as recorded in Alison Thornton's
 11 notes, I think there was at least two other occasions in
 12 my notes where I ask for the SCG to happen, one at 2 am,
 13 then one at 3 am, but ultimately it didn't happen until
 14 4.15.
 15 Q. Ultimately, it didn't happen until 5 hours and
 16 45 minutes after the explosion. What is the purpose of
 17 the strategic coordinating group meeting?
 18 A. Its purpose is to bring the strategic commanders
 19 together from all the organisations who are involved
 20 in the response. Again, that's beyond the initial
 21 response, to draw together where we're at, to agree the
 22 strategy and to agree priority actions and activities
 23 that need to be undertaken to further progress the
 24 response to the incident.
 25 Q. Would you agree that to have the first SCG at 4.15 am

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1 was to have it far too late for that meeting to have any
 2 impact of any meaning on the response?
 3 A. On the response, yes.
 4 Q. Why did it take place so late?
 5 A. Well, my aim was to have it sooner, and I think that's
 6 clear in terms of my requests --
 7 Q. I agree.
 8 A. What happened once I was at headquarters meant that
 9 those first few hours, my time was taken up with
 10 briefing staff, directing people around the SIO, the
 11 SIM, liaising with CT Policing to try and gain
 12 intelligence around what happened, what potentially
 13 could happen, threat management more than anything, so
 14 my focus was on that, bearing in mind we were beyond
 15 that initial response phase, I believed the casualties
 16 had all been evacuated from the scene at that point.
 17 The SCG is an important meeting at the point at
 18 which we are able to pause and say, "Right, what happens
 19 next?"
 20 Q. Exactly.
 21 A. I don't think it replaces the need for me to liaise
 22 probably more closely with fire and ambulance in that
 23 room but if I'd understood there were issues I would
 24 have done that, but because we had co—location, it felt
 25 that it was something that wasn't as high a priority as

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1 perhaps I now know and understand it should have been if
 2 I was aware of some of the issues that had happened on
 3 the night.
 4 Q. You didn't know what you didn't know, did you?
 5 A. No.
 6 Q. But does it seem a fair conclusion to draw that had the
 7 SCG taken place earlier, as you had wanted, it would
 8 have flashed out some of these issues such as, in
 9 particular, the non—attendance of the Fire and Rescue
 10 Service at the scene?
 11 A. I agree it would have flushed out the issues, but I'm
 12 not sure, given the circumstances, it would have been
 13 best to be having those conversations at that time in
 14 the response on that night. There were issues that
 15 needed to be addressed, but because they were not --
 16 I wasn't aware of them in that initial hour, the moment
 17 it passed in my view as well, in that sense, does that
 18 make sense, around -- the purpose of sitting down or
 19 getting together or people saying, "We haven't got the
 20 information, can we have it", shouldn't wait until
 21 a meeting, it should happen.
 22 Q. Yes.
 23 A. So in the absence of an SCG there were other mechanisms
 24 by which those issues could have been addressed and
 25 I don't think the time was best spent (overspeaking) --

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1 Q. Except they weren't.
 2 A. No, they weren't, I accept that, but equally I do feel
 3 there were opportunities for people to say, "We don't
 4 know what's happening, we aren't at the scene,
 5 we haven't been at the scene, what needs to be done if
 6 there's anything else that still needs to be done", and
 7 an SCG and a formal meeting with an agenda would not
 8 have resolved those issues.
 9 Q. An SCG would or should have identified the issue of the
 10 non-attendance of the Fire and Rescue Service, do you
 11 agree?
 12 A. Not necessarily, because why would we discuss
 13 non-attendance? Because the moment has passed and there
 14 are so many things to do in terms of an SCG coming
 15 together with those people just continuing to manage the
 16 incident. So yes, it could have -- you know,
 17 Mr O'Reilly could have identified at the 4.15 meeting
 18 that they hadn't attended but he didn't and --
 19 SIR JOHN SAUNDERS: If you're talking about things going
 20 forward, so the things you are saying you gave
 21 instructions about and were dealing with and coping with
 22 after the initial crisis, as it were, was over, actually
 23 having you all talking about that, because you won't
 24 necessarily think about everything that has to be done,
 25 is a really good idea because they're all going to be

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1 involved in these things down the line. So the sooner
 2 you can have that talk together and plan for the future,
 3 which is what you were really saying you were going to
 4 do --
 5 A. I still think we were in phases at this point, sir, to
 6 be honest, because there was still -- that's -- I know
 7 Garry Shewan had an extensive SCG in the morning and an
 8 extensive strategy. But in the middle of the night,
 9 when everybody's still trying to understand where we're
 10 at, what's going on, what needs to be done, it's much
 11 more of a priority action conversation as opposed to
 12 a reflection on, "You didn't turn up for an hour and
 13 a half, where were you, why were you not there?" It
 14 seems to me not necessary to have that conversation at
 15 that point, albeit the conversations are incredibly
 16 important further on.
 17 SIR JOHN SAUNDERS: A suggestion's been made that this was
 18 in some way replaced by a round-the-room where everybody
 19 stopped talking.
 20 A. Yes, they did.
 21 SIR JOHN SAUNDERS: And there were conversations about what
 22 and when?
 23 A. So Chris Hill had round-the-rooms -- this came up during
 24 Kerslake as well. I believe the only one that was
 25 recorded in his book, and I think there were others,

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1 I don't know what Chris said yesterday, so I won't speak
 2 for him, was at 2.45. I was in the VTC with London at
 3 that point so I wasn't in the room for it but he was
 4 doing that and I know that both the strategic and
 5 tactical commanders participated and agencies, the
 6 Manchester City Council Gold was there, TfGM, Fire and
 7 Rescue Service, they were all there at that point at 2
 8 (overspeaking) --
 9 SIR JOHN SAUNDERS: I think we heard about 2.45, but I think
 10 that's the only one we heard about.
 11 MR GREANEY: I think that's right, yes.
 12 SIR JOHN SAUNDERS: Thank you. Right.
 13 MR GREANEY: Let's conclude the chronology and then I'll
 14 have just a couple of issues to ask you about finally.
 15 At 7 am, did you hand over Gold duty to Assistant
 16 Chief Constable Shewan?
 17 A. Yes.
 18 Q. You retired from duty at 11.30 am?
 19 A. Yes.
 20 Q. But then had to return to duty at 4 pm to take over as
 21 Night Gold?
 22 A. Yes, that's right.
 23 Q. Did you remain Gold for Operation Newtown for over
 24 a year?
 25 A. Yes, I did.

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1 Q. What was Operation Newtown, because we have seen
 2 a number of references to it?
 3 A. Operation Newtown was the name that was given to GMP's
 4 response to the consequence management relating to the
 5 attack.
 6 Q. Mr Cooper, on behalf of one of the family groups, has
 7 drawn my attention to a particular note that you made
 8 in the notes by which you prepared for the presentation
 9 and has invited me to ask you what it means. So I'm
 10 going to ask that we have it on screen. {INQ040516/29},
 11 please.
 12 It's just one sentence:
 13 "The nature and depth of the recovery planning is
 14 impressive."
 15 Then what does it read, "and the common thread"?
 16 A. "... the common thread from the outset of response and
 17 now recovery is now focused on victims and families."
 18 Q. What did you mean, I'm invited to ask you, by that
 19 phrase, "recovery planning"?
 20 A. So the recovery coordination group is what follows the
 21 strategic coordination group. So the strategic
 22 coordination group deals with the response and the
 23 aftermath and the recovery coordination group will deal
 24 with a broad range of issues and develop workstreams
 25 around victims and families, ongoing long-term support,

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1 the recovery of the city, communities work, because we
 2 had a lot of issues following this. So the RCG becomes
 3 the longer term issues, it looks at the finance around
 4 it, funding opportunities, welfare support to bereaved
 5 families and victims, survivors. It does a whole host
 6 of things and, as I say there, there were seven
 7 workstreams identified and Sarah Todd chaired that RCG
 8 and the RCG formally took over on 31 May 2017.
 9 Q. That's very helpful. It sounds from what you've said as
 10 if any investigation of that planning would be outside
 11 of scope, but I hope that the answer you have given at
 12 least enables Mr Cooper to understand what that is
 13 a reference to.
 14 MR COOPER: I'm very grateful to the witness and to
 15 Mr Greaney, thank you.
 16 MR GREANEY: Two topics finally and they relate to
 17 subsequent events or processes in which I think you were
 18 involved. The first is a debrief. Do you recall that
 19 you took part in what was described as a structured
 20 debrief on 26 July 2017?
 21 A. Yes, I do.
 22 Q. We'll have this on the screen, Mr Lopez. It's
 23 {INQ000790/1}. We can see that you are one of those who
 24 participated.
 25 A. Yes.

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1 Q. Was this a situation in which the group of you got
 2 around a table or did you fill in a document that you
 3 then submitted?
 4 A. There was a document beforehand. Unfortunately, I don't
 5 know where my document is, I haven't seen any of the
 6 documentation. But how the structured debrief works is
 7 it's hosted by two people, ie the debrief team, they
 8 bring us together and talk to us about areas we thought
 9 went well and areas where we thought we needed to
 10 improve. There was a group discussion on those points.
 11 The debrief team then take those away and produce
 12 recommendations.
 13 Q. I'm going to identify what some of those recommendations
 14 were and see if you agree with them. {INQ000790/2}:
 15 "1. Consider setting up a single tri-service
 16 Airwave channel which can be maintained and checked
 17 regularly."
 18 Did you agree with that recommendation?
 19 A. It was already in place, but yes.
 20 Q. "Review whether there is a need for an aide-memoire for
 21 supervisors in the communications room around use of the
 22 tri-service channel and how to set up the channel."
 23 Do you agree with that?
 24 A. I wouldn't say I would disagree with it. I don't
 25 remember the discussion around it now. But I'd probably

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1 say in relation to debrief, a lot of what's said in
 2 debriefs is written down and then recorded without any
 3 sense of does the group agree. So this is not
 4 a consensus, these are points that are raised by people
 5 in -- some of them are debated and some of them won't be
 6 and some of them will be from (overspeaking) reports --
 7 Q. I'll just see to what extent a few more reflect your own
 8 opinion based on your experience:
 9 "Consider the creation and use of a dedicated
 10 hotline phone number to the force duty officer to ensure
 11 senior key staff can make contact."
 12 A. Yes.
 13 Q. You'd certainly agree with that recommendation --
 14 A. Absolutely, yes.
 15 Q. -- because you yourself experienced very significant
 16 difficult in getting in touch with the FDO:
 17 "There is an array of contingency plans held within
 18 the GMP shared drive. Consider a way of highlighting
 19 critical plans for use by the Silver commander.
 20 Consider awareness training for Silver to ensure there
 21 is a greater understanding of their role within major
 22 plans."
 23 A. Yes.
 24 Q. Again, I think you'd agree with that, although perhaps
 25 expand that out to include Gold commanders as well?

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1 A. Yes.
 2 Q. Then:
 3 "Consider an awareness/training package for the
 4 Silver Nights on-call role which could include an
 5 operational mentoring and shadowing system."
 6 Again, I'm pretty confident you'd agree with that
 7 one?
 8 A. Yes.
 9 Q. If we go forward to {INQ000790/4}, please.
 10 You, I believe, were participant 14:
 11 "Areas for improvement. Experience of Silvers used
 12 at night-time for on-call role is low."
 13 From what you have told us, that certainly reflects
 14 your view?
 15 A. Yes.
 16 Q. Then the bottom entry, not identified by you but I think
 17 certainly you agree with it:
 18 "The knowledge of the implications of Plato and its
 19 terminology and impacts at Silver level was low."
 20 A. Yes.
 21 Q. Finally, certainly at this stage, I just want to ask you
 22 to agree with a proposition I'm going to put to you
 23 about partnership working. I'm going to do that by
 24 testing something that appears in a document that you,
 25 I think, must have played some part in, but you'll put

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1 me right if I've got that wrong.
 2 It is a fact sheet that emanates, I think, from
 3 Operation Newtown. The reference is {INQ032798/1}.
 4 Your staff officer may have been the author of this,
 5 but I can't imagine it was prepared without input by you
 6 and your approval. Do you recognise this document?
 7 A. Yes.
 8 Q. Can you tell me what it is, please?
 9 A. It's a summary of the events of 22 May — sorry,
 10 Mr Greaney, is this the one that was created in respect
 11 of Newtown for the HMIC when they did their assessment
 12 of us?
 13 Q. I'm not sure. I think it's dated December 2017 if that
 14 helps.
 15 A. To the best of my recollection, it is not authored by me
 16 but obviously the detail will have come from people like
 17 myself. I'm not sure whether that's the summary because
 18 the HMIC inspected us in order to approve our requests
 19 for financial support.
 20 Q. I don't know the answer to that question but I think
 21 what you're saying is you do recognise it?
 22 A. Yes.
 23 Q. Whatever its precise purpose was, whilst (inaudible:
 24 distorted) it would have been a document that you
 25 approved?

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1 A. Not approved but I have seen it, yes.
 2 Q. You have seen it, right.
 3 A. Yes.
 4 Q. I don't want to overstate the importance of it. Let's
 5 get straight to what I want to ask you about. It's
 6 {INQ032798/2}. Four paragraphs down:
 7 "The speed and cohesion of the partnership working
 8 was superb, which in turn galvanised the public support
 9 and created the single voice coming out of Manchester."
 10 Would you agree that insofar as that is a reference
 11 to partnership working between emergency services, it is
 12 inaccurate?
 13 A. In relation to the joint working between the three
 14 services on the night, yes.
 15 Q. Indeed, I'm going to highlight a series of features and
 16 then put a proposition to you.
 17 There was, as the chairman has observed, never
 18 an RVP that was truly used by the different services.
 19 There wasn't a real FCP, at least within the first
 20 90 minutes. There was no co-location by Silver
 21 commanders. No real shared situational awareness by
 22 them. No joint assessment of risk by them. The Fire
 23 and Rescue Service and the Ambulance Service were never
 24 told about the declaration of Operation Plato. The Fire
 25 and Rescue Service didn't arrive until it was

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1 essentially pointless for them to have done so. The SRT
 2 never arrived. And the Ambulance Service, HART and
 3 indeed paramedics more generally, never entered in
 4 numbers.
 5 Do you agree with this proposition, that all of that
 6 together represents a significant failure of joint
 7 working on the night of the arena attack?
 8 A. In the context in which you describe it there, the
 9 partnership working was not as it should have been and
 10 could have been much better. I think it worked well in
 11 part, in terms of the response and how Mike Smith and
 12 NWAS dealt with the actual response at the scene.
 13 But in terms of applying the JESIP principles, there
 14 were obviously failings in our response in terms of
 15 working together, sharing information. I did believe
 16 there was an FCP, I think I've noted it on page 2 of my
 17 notes.
 18 SIR JOHN SAUNDERS: Pretty late.
 19 A. Yes, Mark Dexter —
 20 SIR JOHN SAUNDERS: It was set up outside the entrance to
 21 the station —
 22 A. I would agree with that, yes.
 23 SIR JOHN SAUNDERS: But very late.
 24 A. So an FCP wasn't established in that first part but —
 25 again, I can't talk to this document because they're not

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1 my words, certainly. But yes, there were certainly
 2 areas where we could have improved.
 3 SIR JOHN SAUNDERS: Can I just say, there is a distinction
 4 which the inquiry, I'm sure, will draw between people
 5 working in the City Room and elsewhere who were
 6 heroically doing their best, working together to make
 7 things happen for the benefit of the public and those
 8 who were injured; that's one thing.
 9 A. Yes.
 10 SIR JOHN SAUNDERS: The organisation and the carrying-out of
 11 the policies of actually doing it is an entirely
 12 different thing. So if we are criticising, or if we do
 13 criticise, or whatever happens, criticise the way the
 14 systems work, which was, as we have heard, not in
 15 accordance with what had been set out and prescribed,
 16 we are not criticising the individuals who were doing
 17 their very best in really difficult situations and the
 18 two do need to be separated.
 19 A. I understand what you're saying, sir, and appreciate
 20 that. I think there is an over-engineering of certain
 21 aspects of plans which lead us to the conclusion that
 22 there is, as the expert report says, significant
 23 failures. I think that's something perhaps that needs
 24 to be teased out in a different way to understand
 25 exactly what is meant by some of the words.

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1 Because it is easy to have the words, JESIP is
 2 great. As an app it tells you what things are, but
 3 what's the meaning behind the words? Because if we're
 4 not clear on what's an expectation of co-location,
 5 accepting we should all understand what communication
 6 is, I think that's where people start to apply their own
 7 subjective viewpoint as to the meaning of things.

8 And that's when it sounds like I'm saying, actually,
 9 I don't think it was as bad, but yes I understand your
 10 point, separate the two things out. Are we
 11 over-engineering and creating too many plans?

12 SIR JOHN SAUNDERS: Maybe.

13 A. But really when you try and apply them in live time,
 14 because we can't test these issues, we can't test Plato
 15 in a highly stressful situation, to put that pressure on
 16 commanders to make these decisions in the right way.
 17 There's got to be a different way to do that, I think.
 18 I think it's achievable, I just think it has to be done
 19 in a different way to how we do it.

20 SIR JOHN SAUNDERS: But you can test Plato and you did do,
 21 Winchester Accord, and the response was found wanting.

22 A. Yes. And then the other issue being the application of
 23 that learning into the organisation. But how do you
 24 create pressure? Take someone like myself, put me into
 25 that situation. How am I going to react and respond?

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1 That is the bit that I think probably needs to be dealt
 2 with differently because (overspeaking) --
 3 SIR JOHN SAUNDERS: (Overspeaking) some is make the reaction
 4 a muscle reaction, so you know it so well, you react
 5 automatically. Is that possible?

6 A. It's very difficult because, as I said to you before,
 7 this is the first time I'd dealt with a major incident,
 8 spontaneous, no-notice response to something. And
 9 I think we're quite good in the police to say we deal
 10 with major incidents a lot. We don't. We deal with
 11 critical incidents a lot and it's an entirely different
 12 thing. So finding a way in which the pressure and
 13 stress and no-notice element can be tested I think would
 14 be of huge benefit because commanders need to know as
 15 well how we're going to respond in these situations and
 16 finding out in live time is not the best circumstance,
 17 so --

18 SIR JOHN SAUNDERS: But don't the live exercises do that?

19 A. You don't get the pressure.

20 SIR JOHN SAUNDERS: You can't have the pressure that people
 21 are actually being shot and dying.

22 A. You can't but I think there's something about how the
 23 testing regime could be applied in a more stringent way,
 24 at pace, without the kind of ability to pause frequently
 25 and say, "Okay, let's reflect". If you put somebody

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1 into dynamic situation and give them a 2-hour paper feed
 2 or Hydra exercise, that's going to feel very, very
 3 different. You can never replicate this, obviously, but
 4 we can take the learning of it and the experience of
 5 those of us who have been in it and other attacks and
 6 put it together and say, "How do we create the
 7 pressure", because --

8 SIR JOHN SAUNDERS: You think the exercising maybe could be
 9 improved?

10 A. I definitely do. I have talked about it a lot in my own
 11 force because, heaven forbid it happens where I am now
 12 or ever happens again for that matter, I don't want my
 13 staff being in a position where they feel they're not
 14 trained, they don't know how it's going to feel.
 15 Because we can take a lot from this in terms of this
 16 experience and use it effectively to recreate that
 17 environment, I think. It's something that we should
 18 take from it and think about the testing programme
 19 differently.

20 SIR JOHN SAUNDERS: And that hasn't been done so far?

21 A. Not that I am aware of, no.

22 SIR JOHN SAUNDERS: Thank you.

23 MR GREANEY: You said that what needs to be achieved is,
 24 your word, achievable and from what you have told us one
 25 part of achieving it is to ensure that the exercises

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1 feel real or realer to those who are taking part.

2 A. Mm.

3 Q. Are there, in your view, other things that need to be
 4 done to achieve what needs to be achieved?

5 A. Yes, and I think it's part of the issue with testing and
 6 exercising is it's too specialist. So those people who
 7 are involved in testing and exercising tend to be those
 8 people who are in specialist functions or undertaking
 9 command functions and, as I said earlier, the people who
 10 need to be tested or need to have the experience and
 11 understand what should happen are our first responders,
 12 our PCs, sergeants and inspectors particularly, who will
 13 find themselves more often than not in that situation,
 14 and while they will apply common sense to what they're
 15 doing, they need to have the opportunity, and that's
 16 a real challenge because training and testing within
 17 policing is very difficult to achieve because of the
 18 amount of hours it takes.

19 But every tabletop exercise tends to involve
 20 specialist commanders. The follow-up from that would
 21 be: how is the learning disseminated across policing?
 22 Because as we know, and I'm sure people get frustrated,
 23 the same learning comes out of incidents and inquiries
 24 quite frequently, the lessons learned --

25 Q. Exactly.

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1 A. -- and they're not being embedded. So there has
2 probably to be a change to that to achieve greater
3 awareness and understanding of the police's reaction and
4 response to these incidents.

5 For example, the major incident plan does not talk
6 to Operation Plato at all in the sense of it has no
7 regard for it. Key plans that we were expected to
8 execute on the night we were unable to if you relate
9 that to the major incident plan.

10 So who has to understand and have an awareness of
11 what they need to know? And that does come down to
12 response officers and the Mike Smiths of this world
13 absolutely need to know what's expected of them in
14 fairness to them. And equally, again my understanding
15 from the evidence is there was a huge gap in the
16 knowledge and experience of staff in our OCB. And if
17 I'm working on the premise that the FDO is overloaded,
18 I expect around him on that night that he's got people
19 who are adequately trained and understand the plans and
20 the response because the role of the force duty officer
21 is to respond in the first instance, so I feel very much
22 we've let him down in that sense by not having people
23 around him who were suitably trained and able to do the
24 job.

25 The other aspect of this for me is you've raised the

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1 debrief point. If we don't debrief key people very
2 quickly following an incident, things change as you move
3 forward. We were heavily involved in this incident for
4 weeks and weeks and weeks, so our ability to step back
5 and reflect on how we performed on the night in each of
6 our roles and really understand where we could have done
7 better, what actually really worked and didn't work,
8 because it's taken 4 years to get to this stage where
9 we're now seeing -- that's the benefit of the inquiry --
10 the whole raft of people's experience and how they saw
11 it, but it needed to happen much, much sooner.

12 If the debrief takes place in a room and it's -- you
13 know, you've seen the recommendation, that
14 conversation's not enough, I think, for key command
15 roles such as Dale Sexton, Mark Dexter, myself, Arif, to
16 sit us down and say, minute by minute, let's understand
17 where you're at and what you were thinking.

18 So I think there's an opportunity around debriefing,
19 that it's much more structured, or the recording of
20 other actions and activities is captured in an entirely
21 different way post-event, a bit like we would in
22 a firearms incident, with a post-incident procedure and
23 it just does need to be done in a slightly different way
24 to get the best from people in terms of that debrief.

25 MR GREANEY: Thank you very much indeed for that insight and

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1 thank you for answering my questions. Those are all
2 I have at this stage.

3 Sir, I know that Mr Wood on behalf of Mr Sexton,
4 Mr Dexter, has about 5 minutes of questions and that
5 Mr Butt on behalf of CTPHQ also has about 5 minutes of
6 questions. I wonder whether we could have those
7 questions at this stage and then have a break so that
8 we can make an assessment of where we go with the rest
9 of the day.

10 SIR JOHN SAUNDERS: Okay.

11 Questions from MR WOOD

12 MR WOOD: Could we have Mr Dexter's dictaphone transcript
13 back on the screen, please. That's {INQ025409/10}.

14 I just want to explore two issues, please, about
15 this conversation that you had with Chief Inspector
16 Dexter at around about 23.40 on the 22nd. All right?

17 At the bottom of that page, he tells you:

18 "It's starting to settle down a bit now, so I have
19 taken ground--assigned. Rachel's taken the control room
20 and Craig is coming in."

21 Do you see that?

22 A. Yes.

23 Q. So he's telling you there that he's gone
24 ground--assigned; yes?

25 A. Yes.

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1 Q. Was it your understanding that he had already spoken to
2 Superintendent Thompson about taking that position
3 before he spoke to you here?

4 A. I'm not sure whether I actually knew he'd spoken to
5 Mr Thompson but I thought that was the arrangement that
6 had been made.

7 Q. Thank you.

8 And in any event we know that he had tried to call
9 you possibly left a voicemail, at 23.13. We saw that
10 earlier, didn't we?

11 A. Yes.

12 Q. All right. I just want to go back, please, to the
13 questions that you've been asked about the word "fire".
14 That's on {INQ025409/11}, please. Can we go over the
15 page, please?

16 "We've got no fire. You may as well -- we may as
17 well, but NWAS appear to be coping."

18 Do you see that?

19 A. Yes.

20 Q. Do you accept that an interpretation of that recording
21 is this: Mr Dexter told you there were no firefighters
22 there, you offered to find out where they were, and he
23 said, "We may as well"?

24 A. Are you asking me if that could be an interpretation of
25 that?

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1 Q. Firstly, yes, that's the question.
 2 A. Somebody could interpret that in that way, yes.
 3 Q. Right. Isn't that the most natural interpretation of
 4 that sentence, given that it goes on to say:
 5 "But NWAS appear to be coping."
 6 A. That may be in terms of your view but that's not
 7 certainly how I heard that conversation.
 8 Q. You do not recall that --
 9 A. No.
 10 Q. -- as you offering to find out where they were --
 11 A. No.
 12 Q. -- and Mr Dexter saying, "You might as well but", for
 13 example, because by this time all of the injured had
 14 been taken out of the City Room, "NWAS appear to be
 15 coping"? That's not how you recall it?
 16 A. No, as I said in evidence earlier, I didn't hear that.
 17 I know that if Mr Dexter had said to me clearly, "There
 18 is no fire", I would have acted on that, so I don't for
 19 one second interpret it in that way. And on the basis
 20 of my great surprise when I was told later in the day on
 21 Tuesday that they hadn't attended, that confirms to me
 22 that that's the case. Mr Dexter may have a different
 23 recollection of that conversation, that's certainly not
 24 my understanding of it.
 25 Q. You are clear that you didn't find out that the Fire

1 Brigade had not gone to the scene until the Tuesday;
 2 is that right?
 3 A. That they hadn't been at the scene for the first
 4 1.5/2 hours, yes.
 5 Q. You told the inquiry earlier, I think, that
 6 Chief Inspector Buckle arrived at the Silver control
 7 room at the same time as you; is that right?
 8 A. She did, yes.
 9 Q. So was she in the room with you at 23.40 or thereabouts
 10 when this telephone conversation took place?
 11 A. She would have been if I took the call whilst I was
 12 in the incident room. I might have stepped outside,
 13 but, yes, she was present from 23.20.
 14 Q. The inquiry heard from her last week. Have you had the
 15 opportunity of either watching or reading her evidence
 16 of last Monday?
 17 A. Not entirely, no.
 18 Q. I just want to give you the opportunity to comment on
 19 this. She told the inquiry, in answer to questions from
 20 Mr de la Poer Queen's Counsel, that there came a time
 21 when you tasked her to find out where the Fire and
 22 Rescue Service were, that she made a phone call, was
 23 told that they had been told not to go to the scene, but
 24 that someone was coming to Silver, and that she told you
 25 at least, the second part of that conversation, namely

1 that someone was coming to the Silver control room.
 2 What do you say in response to that evidence from her?
 3 A. Again, I don't recall tasking Rachel Buckle anything
 4 about the Fire Service. I'm not disputing if that what
 5 she says I said to her, then that's her recollection,
 6 but it's not my recollection on the night.
 7 Q. A final point just to finish that off. Because if
 8 that is her recollection of what you said to her, then
 9 one interpretation of the evidence is that Mr Dexter
 10 told you there was no fire, you offered to turn them
 11 out, he said you may as well, and you asked
 12 Chief Inspector Buckle to find out where they were.
 13 Do you say that didn't happen?
 14 A. No, like I say, if I was genuinely shocked when
 15 Mr Hopkins told me in the afternoon that they hadn't
 16 been there, so looking at that conversation and the
 17 conversation you're saying Rachel had with me, that does
 18 not -- it is not my recollection at all. I can
 19 understand what you're saying there. I'm presuming what
 20 you're telling me is that Rachel Buckle is saying that
 21 request came as a consequence of this call.
 22 Q. I don't think she was asked about specifically when it
 23 was because her evidence was there was a time when you
 24 tasked her to do that.
 25 A. Again, and it's my recollection of it. I don't recall

1 it and the evidence I gave around the conversation is my
 2 evidence. I would imagine subsequently, knowing the
 3 fire weren't there, I would have recalled the
 4 conversation with Rachel Buckle if that was the case,
 5 but I don't recall having that conversation at all.
 6 MR WOOD: Thank you, deputy chief constable. That is all
 7 I ask.
 8 SIR JOHN SAUNDERS: Thank you very much.
 9 MR GREANEY: Sir, if Mr Butt still has no more than
 10 5 minutes, I will ask him to pose his questions at this
 11 stage.
 12 Questions from MR BUTT
 13 MR BUTT: Yes, thank you.
 14 Deputy chief constable, you were asked whether JESIP
 15 and the Plato doctrine have flexibility within them.
 16 It's right, isn't it, to state the obvious, that in
 17 a Plato declaration, the emergency services are dealing
 18 with exceptionally high-stress and high-demand
 19 situations?
 20 A. That was my experience, yes.
 21 Q. And guidance which encourages joint working is obviously
 22 going to be of assistance to the emergency services
 23 in that situation, isn't it?
 24 A. Yes.
 25 Q. Could we look, please, at the third Joint Operating

1 Principles document at {INQ008372/8}.

2 If you look at the bottom paragraph of the document,

3 does it say here:

4 "The principles detailed in this document are not

5 prescriptive but are intended to provide an overarching

6 framework for a standardised approach across the UK.

7 They act as guidance to resilience planners and

8 emergency responders in the development and

9 implementation of local response plans that are

10 consistent with the national approach and interpretation

11 of the risk?"

12 And that was your understanding of the purpose of

13 the joint operating principles ; yes?

14 A. Yes.

15 Q. (Inaudible: distorted) enabling a dynamic response to

16 a marauding terrorist firearms attack would be zoning

17 within the area of the attack, wouldn't it?

18 A. Part of the response, yes.

19 Q. And if we look back at page 8 of that document that we

20 just had up, {INQ008372/8}, above the paragraph we were

21 looking at:

22 "The JOPs on following pages enable commanders

23 at the scene to identify cold, warm and hot zones and

24 limits of exploitation which are critical to the timely

25 deployment of specialist personnel for the purpose of

1 treating and evacuating casualties."

2 A. Yes.

3 Q. And finally on this point please at {INQ008372/15} of

4 the same document, paragraph 4.12:

5 "On-scene commanders from each service need to

6 ensure that there is clear understanding in relation to

7 the agreed boundaries of hot, warm and cold zones."

8 Next paragraph:

9 "Continuous assessment and review of the zones and

10 limits of exploitation should be a priority . The use of

11 the joint decision model will influence the

12 establishment of the zones where practicable and, as

13 soon as safe to do so, consideration should be made for

14 rezoning the warm zone into a cold zone in order to

15 allow non-specialist responders to deploy."

16 Yes?

17 A. Yes.

18 Q. So the quicker the armed officers can confront and

19 neutralise the threat, the quicker the zones can be

20 reduced from hot to warm or the size of the hot and warm

21 zones can be reduced; yes?

22 A. Yes.

23 Q. And that's key to how flexibility can work within

24 a Plato declaration?

25 A. Yes, that's right .

1 Q. You were asked about un-declaring Plato and what

2 commanders can do if it appears that Plato is no longer

3 required. Could we look, please, at the police

4 guidance, so {INQ007211/2}, please.

5 It is important to note from this first page this,

6 of course, is guidance for police forces, isn't it, as

7 opposed to individual officers or commanders?

8 A. Yes.

9 Q. And if we look, please, at {INQ007211/5} of this

10 document, paragraph 2.5, this also says that the

11 guidance is not prescriptive but will assist forces in

12 developing their own plans; yes?

13 A. Yes.

14 Q. If we could look, please, at {INQ007211/7} of the

15 document, paragraph 3.14 -- sorry, the previous page,

16 {INQ007211/6}. Paragraph 3.10 first of all:

17 "Recent attack methodology trends indicate that

18 inspired lone actor attacks are likely to be far less

19 sophisticated than those described above."

20 At 3.12 it says:

21 "Attacks may take the form of a combination of

22 attack methodologies as described before and it may be

23 difficult in the first instance to identify whether the

24 incident is an MTFA or a less sophisticated lone actor

25 type incident."

1 And then over the page, please, at 3.14:

2 "It is important that forces recognise that less

3 sophisticated attacks may be the beginning of or

4 a precursor for more complex attacks."

5 It says at the bottom of that paragraph:

6 "Consideration of an early declaration of Plato,

7 which can always be withdrawn if the scale and

8 sophistication does not escalate."

9 Yes?

10 A. Yes.

11 Q. Finally on this point, at paragraph 4.7, which is over

12 the next page:

13 "If an Operation Plato is declared, and it

14 subsequently becomes apparent the incident is not

15 an MTFA, the officer who has undertaken the role of a

16 TFC must redefine the incident immediately and ensure

17 that all relevant personnel and agencies are informed."

18 So there's a recognition within the police guidance

19 that what could initially appear to be a marauding

20 terrorist firearms attack may, upon the receipt of new

21 information, transpire not to be and in such a situation

22 it ought to be immediately redefined.

23 A. Yes.

24 Q. As you have explained, however, it can be very difficult

25 with conflicting information to come to that decision;

1 is that right?
 2 A. It can, yes, and you've drawn attention to the
 3 paragraphs for me which describe a less sophisticated
 4 attack. Westminster Bridge, as horrendous as it was,
 5 I would describe as a less sophisticated methodology.
 6 This was not in my view -- and was in my thinking --
 7 I think I explained earlier in my evidence today -- this
 8 was not a less sophisticated attack, this was somebody,
 9 as I have said, who has pre-planned, premeditated, built
 10 a bomb, and created, quite frankly, if we define
 11 terrorism as something that can be worse than another --
 12 attacked an event, young people and children, in the
 13 worst possible circumstances.
 14 So that was very much in my head, that -- and
 15 he wasn't acting alone because ultimately, as we know,
 16 his brother was convicted. That was all playing in.
 17 This is not something that he just did on the night; he
 18 had planned and prepared to do so. So in terms of my
 19 thought process of it being a sophisticated attack and
 20 potentially other offenders out there and the
 21 information that we were trying to deal with and draw
 22 conclusions from led me to believe very clearly that
 23 until I understood the nature of this individual in the
 24 absence of any information or intelligence from the
 25 services, I was dealing with a potential MTFA. This was

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1 either a precursor attack -- and at 3.8 of this document
 2 I think the document describes quite clearly the
 3 circumstances of a soft target -- an event. So we were
 4 evolving into: this is no longer an MTFA, Mumbai-style,
 5 over the course of these months, that Plato applies to
 6 sophisticated attacks and I didn't believe it was
 7 appropriate to rescind the authority, and neither did
 8 any of the TFC involved, to my recollection.
 9 Q. I'm not seeking to disagree with you on what you say,
 10 I was just drawing your attention to the guidance saying
 11 how it can be difficult to tell whether it is an MTFA or
 12 a comparatively less sophisticated lone actor attack.
 13 A. I think it's incredibly difficult to ascertain, and
 14 I believe Plato was declared in Westminster, and I'm not
 15 sure if it was rescinded, but it's incredibly difficult
 16 to know with certainty. Therefore, in this situation,
 17 it was best to keep ourselves in Plato to make sure the
 18 response was appropriate and protect the public.
 19 Q. I was simply taking you to the guidance, which says, in
 20 situations like this, an early declaration of Plato will
 21 be appropriate and it can be withdrawn later. I don't
 22 think we disagree in relation --
 23 A. No, we don't.
 24 Q. Can I ask you finally about the question of on-scene
 25 commander. If we could go back to JOPs 3, please,

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1 {INQ008372/5}.
 2 On-scene commander is defined within JESIP, within
 3 the joint operating principles, as:
 4 "An appropriate [police in this case] 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 the
 8 location. On-scene commanders will therefore ensure the
 9 emergency services' response is effectively coordinated
 10 at the scene."
 11 So that's the definition within JESIP; is that
 12 right?
 13 A. Yes.
 14 Q. If we look, please, at the same document {INQ008372/11}
 15 at the paragraph just above paragraph 4.5:
 16 "In the initial response the police on-scene
 17 commander may not be a TFC, but they will remain in
 18 command until a TFC arrives and assumes the role of
 19 police on-scene commander."
 20 A. Yes.
 21 Q. Finally, please, just back to the police guidance at
 22 {INQ007211/17}. Paragraph 7.1:
 23 "Forces should review their Operation Plato plans
 24 in relation to command locations and consider their
 25 structures in relation to deploying dedicated cadre TFCs

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1 as part of the response."
 2 7.2:
 3 "In particular, forces should review their
 4 Operation Plato plans in relation to their ability to
 5 deploy a TFC to undertake the role of on-scene commander
 6 or ground-assigned TFC in a timely manner."
 7 Yes?
 8 A. Yes.
 9 Q. So JESIP foresees the on-scene commander will be a TFC,
 10 and that is reflected in the police guidance; is that
 11 right?
 12 A. Yes.
 13 Q. GMP would then put in place a plan, which would explain
 14 how at a local level that was to be implemented?
 15 A. Yes.
 16 Q. And GMP would have assistance, if they required it, from
 17 the NPCC and CTPHQ in interpreting JESIP or the
 18 guidelines?
 19 A. Yes.
 20 Q. So for example, I think Inspector Lear in May, shortly
 21 before this tragedy, attended a seminar in relation to
 22 the new police guidance.
 23 A. Yes, my understanding is that five people attended that
 24 seminar and, as a consequence, having received this
 25 guidance, they then drew up the new plan for Plato,

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1 which I think you refer to as the Whittle plan. That's
 2 my understanding.
 3 MR BUTT: Thank you very much.
 4 SIR JOHN SAUNDERS: Thank you.
 5 MR GREANEY: Sir, first of all, I'm sorry to the
 6 stenographers that they have had such a lengthy session
 7 this afternoon. I hope they'll bear with me just for
 8 another minute or two whilst I update you, sir.
 9 In the last 15 minutes I've had an opportunity to
 10 consult some CPs, but by no means not all CPs, about the
 11 likely length of outstanding questioning. It's apparent
 12 that there is at least 90 minutes of further
 13 questioning. We, of course, would need to have a break
 14 at this stage and there is therefore a nil prospect of
 15 finishing the deputy chief constable's evidence this
 16 afternoon. I'm very sorry to hear that that is the
 17 position, I know she was very much hoping to conclude
 18 her evidence today.
 19 SIR JOHN SAUNDERS: Does that cause you real difficulty?
 20 A. No, sir, it's not a problem.
 21 MR GREANEY: The deputy chief constable has been very clear
 22 to me that she sees giving her evidence as a priority,
 23 for which we're grateful.
 24 I have also consulted about the impact on what feels
 25 like a very long day upon a number of persons.

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1 I haven't consulted you, sir, but the view is that
 2 it would be rather better to draw stumps for the day
 3 than to come back for a short period of further
 4 evidence, fairest on everyone, including fairest on the
 5 witness, but we are, of course, all in your hands.
 6 SIR JOHN SAUNDERS: Is that a long way of saying that you
 7 want to stop now?
 8 MR GREANEY: Yes.
 9 SIR JOHN SAUNDERS: That's fine. I just want to raise two
 10 things, if I may, because I will have forgotten about
 11 them by tomorrow.
 12 MR GREANEY: Of course.
 13 SIR JOHN SAUNDERS: First of all, you've got a lot of really
 14 helpful ideas which could feed into recommendations.
 15 I'm not going to ask you to do it now, but would it be
 16 possible for you to find the time to put them in
 17 writing?
 18 A. I've already documented some, sir, so yes.
 19 SIR JOHN SAUNDERS: That would be really helpful.
 20 Second, and you can think about this overnight if
 21 you like, but what seems to me as coming out of being --
 22 what may have been the most appropriate response to this
 23 may have been: declaration of Plato when it happened,
 24 armed police arrive en masse very quickly, which they
 25 absolutely did, and I'm sure no one can suggest that

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1 whatever else went wrong on this night, the speed at
 2 which the armed police arrived and went about their job
 3 seems to me to be uncontroversially extremely good as
 4 within a minute or so, they had cleared the City Room,
 5 they'd gone through it.
 6 The City Room until then was clearly a hot zone.
 7 The bomb had just gone off there. If anywhere was going
 8 to be a hot zone, that was it. But once they'd gone
 9 through -- which took, what, 2 or 3 minutes?
 10 MR GREANEY: Not even as long as that, sir.
 11 SIR JOHN SAUNDERS: Not even as long as that. They know
 12 it's clear, they've got gunmen all around, protected,
 13 there's no gunman in there. It then becomes a warm zone
 14 and you assess it like that. Now, why is that not the
 15 obvious response and what would seem to be the correct
 16 response at the time? I know it's easy for me to say
 17 now, having the benefit of hindsight and seeing
 18 everything else, but nevertheless that may seem what
 19 would be obviously the response, and I wonder whether,
 20 when you came on duty, when you became Gold, that that
 21 was not what would strike you as being the obvious
 22 scenario for you to be investigating whether that had
 23 actually happened.
 24 A. Yes, I agree with your point, sir. I think the obvious
 25 thing to happen there, though, is the allocation and

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1 identification of the person at the scene, the on-scene
 2 commander in the absence of a TFC, to make that
 3 assessment, to say ...
 4 SIR JOHN SAUNDERS: Okay. So it's the on-scene commander
 5 again?
 6 A. The on-scene -- somebody there has to say, "We've been
 7 through the City Room, with armed police, we know
 8 there's nothing going on in there. At that time it's a
 9 warm zone". Somebody has to be on the scene to declare
 10 the zones.
 11 SIR JOHN SAUNDERS: And that's what was missing again on
 12 this night?
 13 A. It appears to be the case, yes.
 14 SIR JOHN SAUNDERS: Okay, thank you.
 15 MR GREANEY: Sir, I just wanted to mention one very short
 16 final thing. Mr Jamieson did his best to help us with
 17 the arrival time of Chief Inspector Sue Peters. I have
 18 seen an email from British Transport Police, which
 19 presents a competing position, which, if correct, and it
 20 does appear to be correct --
 21 SIR JOHN SAUNDERS: Mr Jamieson is shaking his head.
 22 MR JAMIESON: I will always defer to Mr Gibbs. I only spoke
 23 because he wasn't here.
 24 MR GREANEY: It isn't from Mr Gibbs, it's from his
 25 instructing solicitor. We'll sort it out, but

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1 I wouldn't want anyone to go away assuming that Chief
 2 Inspector Peters was necessarily present within the
 3 command suite before the call between the deputy
 4 chief constable and the ACC of BTP.

5 SIR JOHN SAUNDERS: I'm very grateful.
 6 I'm sorry you have to come back tomorrow, but you
 7 never know, overnight they may get shorter than
 8 90 minutes. Thank you.
 9 9.30?

10 MR GREANEY: Yes, please, sir.
 11 (4.30 pm)
 12 (The inquiry adjourned until 9.30 am
 13 on Wednesday, 19 May 2021)
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I N D E X

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 3 DCC DEBBIE FORD (affirmed)1
 4 Questions from MR GREANEY1
 5 Questions from MR WOOD227
 6 Questions from MR BUTT232
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