

OPUS2

Manchester Arena Inquiry

Day 108

May 24, 2021

Opus 2 - Official Court Reporters

Phone: +44 (0)20 3008 5900

Email: transcripts@opus2.com

Website: <https://www.opus2.com>

Monday, 24 May 2021

1
2 (9.30 am)
3 (Delay in proceedings)
4 (9.46 am)
5 SIR JOHN SAUNDERS: Good morning.
6 MR GREANEY: Sir, good morning. The gentleman in the
7 witness box is retired Superintendent Craig Thompson,
8 and in a moment I'll ask that he be sworn.
9 First of all, may I inform you that Mr Cooper has
10 a problem with the technology this morning, we've given
11 him as much assistance as we can and hopefully that will
12 have resolved the situation so that he can follow on
13 BlueJeans. But I've asked Mr Di Francesco, his junior,
14 who is present in court, to tell him if he continues to
15 have a difficulty, unfortunately we do need to make
16 progress. If he could follow the proceedings on
17 YouTube, there will be a break, of course, during which
18 he can catch up and let us know if there are any
19 questions arising out of any new matters that need to be
20 posed on behalf of his families.
21 MR CRAIG THOMPSON (sworn)
22 Questions from MR GREANEY
23 MR GREANEY: Begin, please, by telling us your full name.
24 A. Craig Thompson.
25 Q. In May 2017, were you a superintendent in the specialist

1

1 operations branch of Greater Manchester Police?
2 A. Yes.
3 Q. And did you perform the role of tactical firearms
4 commander from about 12.15 am on 23 May of that year in
5 response to the Manchester Arena attack?
6 A. Yes.
7 Q. Mr Thompson, as you will appreciate, we have seen many
8 of the communications in which you were involved that
9 night, and so with no disrespect to you, or to your
10 efforts on the night, we're going to take your evidence
11 quite shortly. Does that make sense?
12 A. Yes, sir.
13 Q. First I am going to deal with your career. Did you join
14 Cheshire Police in 1992 after a career in the British
15 Army?
16 A. Yes, sir.
17 Q. And serve in that force as both a constable and
18 a sergeant?
19 A. Yes, sir.
20 Q. Did you join GMP on promotion to inspector in 2001?
21 A. Yes.
22 Q. And in 2003, were you promoted to the rank of
23 chief inspector?
24 A. Yes.
25 Q. Thereafter, were you promoted to the rank of

2

1 superintendent?
2 A. Yes.
3 Q. And did you move in that rank to the specialist
4 operations branch in 2011?
5 A. Yes.
6 Q. Did you remain there until your retirement in
7 January 2019?
8 A. Yes.
9 Q. You have, I think, now a new role outside of policing?
10 A. Yes.
11 Q. What is that role, please?
12 A. Head of security and stadium safety for Manchester
13 United Football Club.
14 Q. Bearing in mind the role that you now have and the
15 previous role that you had as a senior police officer,
16 I'm going to ask you a few questions about the Protect
17 duty. Are you aware of what the Protect duty is?
18 A. Yes.
19 Q. Are you a proponent of the Protect duty?
20 A. Yes, both myself and Manchester United Football Club.
21 Q. Are Manchester United gearing up to implement
22 a statutory Protect duty?
23 A. Yes, we have been part of the consultation in relation
24 to that with other stakeholders. We also at the current
25 time, and have for several years, employed the services

3

1 of specialist security managers in relation to Protect
2 and the sort of operational requirements that would come
3 out of a duty like that.
4 Q. So in short, I think it would be fair to say that
5 Manchester United welcomes a Protect duty?
6 A. Yes, sir.
7 Q. And considers that it is already in a good place to
8 implement such a duty?
9 A. It certainly is, yes.
10 Q. That is all I want to ask you about your career. Next,
11 your training as a police officer. I think it would be
12 fair to say that there were, through absolutely no fault
13 of yours, some ebbs and flows in your accreditation as
14 a tactical firearms commander, but by May of 2017 you
15 had many years of experience in that role?
16 A. Yes, that's correct.
17 Q. In June 2016 did you attend the specialist tactical
18 firearms commander's course?
19 A. Yes.
20 Q. As you will appreciate, because I know that you watched
21 the evidence of Deputy Chief Constable Ford and
22 Superintendent Dexter, we have heard from them about the
23 nature of that course.
24 A. Yes.
25 Q. In short, would it be fair to summarise the position in

4

1 this way: that course provided a TFC with particular
 2 skills and knowledge that would be of use in the event
 3 of an incident such as the arena attack?
 4 A. Yes.
 5 Q. Would it also be fair to say that your qualification
 6 in that regard was to be of importance in decisions as
 7 to allocations that were made on the night of the 22nd?
 8 A. Yes.
 9 Q. During the STFC course, did you obtain some input on
 10 Operation Plato?
 11 A. Yes.
 12 Q. And would you describe that input as being substantial,
 13 limited or in some other way?
 14 A. It was a limited input about what the capabilities and
 15 what support comes with a declaration of
 16 Operation Plato, but I think whilst it wasn't
 17 specifically geared towards Plato, the whole of the
 18 course enabled and gave the commanders who passed the
 19 course skills around assessment of threat in high-threat
 20 firearms operations and situations.
 21 Q. As we've heard, the course was a pass-or-fail course
 22 with a high level of attrition .
 23 A. Yes.
 24 Q. And it was a course that ultimately you passed?
 25 A. Yes, that's correct .

5

1 Q. Did you receive during your police service , and prior to
 2 22 May, any other training specific to Operation Plato?
 3 A. I think we'd discussed Operation Plato at some CPD
 4 events. I actually -- I think 3 weeks before the
 5 incident on the 22nd, I attended a training day with
 6 partners from the Fire Service and the
 7 Ambulance Service, as well as GMP's firearms unit,
 8 looking at the actual operational deployment of firearms
 9 officers in warm zones to support the deployment of both
 10 Fire Service and Ambulance Service colleagues.
 11 Q. So I was in fact going to ask you about that, so
 12 thank you for jumping to it. The position, I think,
 13 is that you never attended a specific JESIP training
 14 event?
 15 A. That's correct, sir , yes.
 16 Q. But it would be wrong to think that you were without
 17 training in JESIP issues?
 18 A. Yes.
 19 Q. And indeed, as you've just mentioned to us, there was
 20 a particular course that you attended?
 21 A. That's correct, yes.
 22 Q. And you, or if not you then GMP, have been able to
 23 ascertain that you attended that course just a short
 24 time before the arena attack, on 2 May 2017?
 25 A. Yes.

6

1 Q. You began to tell us about that course, but what form
 2 did that course take?
 3 A. It was an initial briefing by the -- I think it was
 4 Inspector Simon Lear at the time, regarding how
 5 a response, a JESIP-based response to Plato and MTFA
 6 would take place. Then there was a presentation from
 7 the NILOs, as I remember, from the Fire Service and the
 8 Ambulance Service about what their roles would be. So
 9 that was a classroom-based presentation that lasted for
 10 a few hours. Following that, there was then an
 11 arena-based practical exercise, which would then allow
 12 the firearms officers , the NILOs, then to equip their
 13 staff with the relevant equipment to then work and
 14 practice in the arena of how operations in a warm zone
 15 would take place.
 16 Q. I just want to make sure I fully understand this. So
 17 this was a course that Simon Lear, from whom we've
 18 heard, was presenting?
 19 A. Yes.
 20 Q. It involved attendance by not only officers of Greater
 21 Manchester Police but also the NILOs from the Fire and
 22 Rescue Service and the Ambulance Service?
 23 A. That's correct, yes.
 24 Q. There were presentations by each service?
 25 A. Yes.

7

1 Q. The course dealt specifically with the tri-service
 2 response to an MTFA?
 3 A. Yes.
 4 Q. Each service gave a presentation, indicating what value
 5 it could bring to the response to such an event?
 6 A. Yes.
 7 Q. And once those presentations had been made, there was
 8 a practical experience; is that correct?
 9 A. That's correct, yes.
 10 Q. And you mentioned the arena. Do you mean that,
 11 literally , the practical experience was focused upon the
 12 arena?
 13 A. Apologies. It was the training arena at the police
 14 training centre.
 15 Q. Are you talking about the FRS training centre at
 16 Thompson Street?
 17 A. No, sorry, apologies, the public order training centre
 18 at Greater Manchester Police.
 19 Q. The Greater Manchester Police training centre. So to
 20 pull all of this together, as of May 2017, did you
 21 understand what an MTFA was?
 22 A. Yes.
 23 Q. Did you understand what Operation Plato was?
 24 A. Yes, I did.
 25 Q. And did you understand the importance of a joint

8

1 response to an Operation Plato situation?
 2 A. Yes.
 3 SIR JOHN SAUNDERS: Mr Greaney, before you go on, can I just
 4 be clear. We've heard that there were commanders'
 5 courses following the failings in Winchester Accord --
 6 MR GREANEY: Yes.
 7 SIR JOHN SAUNDERS: -- which I thought were in January
 8 or February of 2017.
 9 MR GREANEY: You're right, yes.
 10 SIR JOHN SAUNDERS: So this is a different course?
 11 MR GREANEY: I'm not entirely sure. It sounds very similar
 12 to the course that was being described. I don't know if
 13 you have any insight into that, Mr Thompson.
 14 A. This is a ... It wasn't the same course, I didn't attend
 15 the January training at Thompson Street, so I probably
 16 couldn't comment on the content of that course. I think
 17 this was aimed towards operational practitioners and
 18 commanders like myself, who would go to observe the
 19 tactics and get a grounding as opposed to training
 20 around command.
 21 Q. Do you know what triggered the course that you did
 22 attend in May 2017?
 23 A. I don't, sir, no.
 24 Q. But at all events, did you derive some benefit from that
 25 course?

9

1 A. Yes, I did, yes.
 2 Q. Just to finish off the questions that --
 3 SIR JOHN SAUNDERS: Sorry, is this the first time we've
 4 heard of this course?
 5 MR GREANEY: It is the first time we've heard of this
 6 course, yes. Inspector Lear did give evidence of the
 7 course. I hadn't appreciated that he was involved in
 8 the course. I'll need to check back over what he said.
 9 SIR JOHN SAUNDERS: We can have some more information, no
 10 doubt, to clarify any ambiguities.
 11 MR GREANEY: I can see Mr Horwell nodding. I know GMP have
 12 been looking at the course because they very kindly
 13 provided some further information about date and so on
 14 at the end of last week, but we'll find out as much as
 15 we can about it.
 16 SIR JOHN SAUNDERS: Sorry to interrupt you, it's just
 17 important I know the context to all this.
 18 MR GREANEY: I don't suppose you remember who from the Fire
 19 and Rescue Service and the Ambulance Service attended to
 20 give presentations?
 21 A. No, sir, no.
 22 Q. Thank you.
 23 SIR JOHN SAUNDERS: Or how many police commanders, firearms
 24 commanders were on the course?
 25 A. No, apologies, sir.

10

1 MR GREANEY: We'll look into it in due course.
 2 A. I think the training took over a 6-week period, which
 3 captured the six operational firearms teams, so it was
 4 around the firearms teams' training. So commanders like
 5 myself could come and observe but it was geared around
 6 the 6 weeks and the 2 May, when I attended, was the last
 7 course.
 8 Q. The course lasted for one day or longer than one day?
 9 A. I think it was probably just over half a day, I think it
 10 was, the total content.
 11 Q. There is, as I understand it, no doubt that Mr Thompson
 12 is correct that there was such training and that it
 13 occurred on 2 May and we'll do what we can to find out
 14 more about it.
 15 SIR JOHN SAUNDERS: And you gained benefit from learning
 16 what the Ambulance Service and the Fire Service could
 17 do --
 18 A. Yes.
 19 SIR JOHN SAUNDERS: -- in an emergency?
 20 A. Yes.
 21 MR GREANEY: As you'll appreciate, I will have some more
 22 questions to ask you about that in due course.
 23 Just to finish off the questions about training and
 24 experience. As of May 2017, were you an accredited
 25 Bronze, Silver and Gold commander?

11

1 A. Yes, sir.
 2 Q. And had you operated in a command role in many
 3 challenging situations?
 4 A. Yes.
 5 Q. Including the Salford riots?
 6 A. Yes.
 7 Q. That presumably was a response to a spontaneous
 8 incident?
 9 A. It was, yes.
 10 Q. And you had also commanded in respect of many major
 11 planned operations?
 12 A. Yes.
 13 Q. Had you, in the course of those operations, been
 14 involved in the command of many armed operations?
 15 A. Yes.
 16 Q. And as of May 2017, were you very familiar with working
 17 within the command suite at force headquarters?
 18 A. Yes.
 19 Q. Against that background, we'll turn to 22 May. On the
 20 night of the attack, were you at home, off duty, and not
 21 on call?
 22 A. That's correct, yes.
 23 Q. At about 11 pm, did you notice that you had a number of
 24 missed calls from Chief Inspector Dexter, as he was?
 25 A. Yes.

12

1 Q. We know that those were timed at 22.51 and 22.56. Did
 2 you telephone him back at 23.09?
 3 A. Yes, I did, yes.
 4 Q. We know from records that there was then a contact
 5 lasting for 43 seconds.
 6 A. Yes.
 7 Q. Do you recall that conversation with him?
 8 A. Yes. Mark contacted me, he said -- I remember the
 9 words, he said that Plato had been declared and, in his
 10 words, there'd been -- he said eight fatalities at
 11 a Take That concert at the Manchester Evening News
 12 arena, and that he was on his way in and he'd take the
 13 role of, I think, a ground--assigned or one of the
 14 firearms commanders on the night, but I can't remember
 15 if he said that he had phoned Rachel or was going to
 16 contact Rachel, and that was the nature of the
 17 conversation that we had.
 18 Q. Rachel being Chief Inspector Buckle?
 19 A. That's correct, yes.
 20 Q. So you understood there had been an attack at the arena?
 21 A. Yes.
 22 Q. That there were fatalities?
 23 A. Yes.
 24 Q. That he was on his way there to perform a
 25 ground--assigned role?

13

1 A. Yes.
 2 Q. That you can't recall if he was going to contact or you
 3 were going to contact Chief Inspector Buckle?
 4 A. No, he certainly either said that he'd already called
 5 her or was going to call her.
 6 Q. I see. Was there any discussion in that call about why
 7 you were being spoken to and what role, if any, you
 8 ought to have?
 9 A. Yes. He also said that this is likely to go -- they'd
 10 like to open a CTPOR, a Counter--terrorism Policing
 11 operations room, but they'd need a specialist tactical
 12 firearms commander in there and suggested that I take
 13 the role, which I agreed with.
 14 Q. So this is a very early conversation in which roles are
 15 being assigned, he's taking the role of ground--assigned
 16 tactical firearms commander, with the suggestion that
 17 you should become the tactical firearms commander at
 18 force headquarters?
 19 A. Yes.
 20 Q. With a view to you thereafter, at some stage, performing
 21 a role in the CTPOR?
 22 A. Yes.
 23 Q. You were also told during that call, as you've told us,
 24 that Operation Plato had been called.
 25 A. Yes.

14

1 Q. What was your reaction to being told that that had
 2 happened?
 3 A. Shocked, clearly. Not something you ever probably
 4 prepare yourself for. And at that time, I thought there
 5 was an ongoing terrorist attack in Manchester, hence
 6 I made my way into work.
 7 Q. That was really what I wanted to understand. When you
 8 were told Operation Plato had been declared, did you
 9 understand from that that it meant there had been
 10 a terrorist attack or that there'd been a terrorist
 11 attack and that there was a continuation or might be
 12 a continuation of that attack?
 13 A. The Plato -- I understood the Plato as being a marauding
 14 terrorist firearms attack, which the precursor could be
 15 something like an IED or an explosion, so although it
 16 wasn't mentioned to me that firearms had been used, my
 17 perception would be that there would be an ongoing
 18 attack and that was probably the precursor for it.
 19 Q. You said would be. Was that in fact your sense as you
 20 took that information from Chief Inspector Dexter?
 21 A. Yes.
 22 Q. As you'll, I think, be aware, the inquiry has heard
 23 evidence of something of a debate about which GMP Plato
 24 plan was in operation at the time. Are you in fact
 25 aware of that debate?

15

1 A. I am, sir, yes.
 2 Q. On the one hand, some consider that what we've called
 3 the Whittle plan was in force and others considered that
 4 SOP 47 v5 was in force. That night, which of those
 5 plans, if either of them, were you working to?
 6 A. I was aware of both plans and I would have been working
 7 to SOP 47, although I was aware of the Whittle plan
 8 because myself and Mark Dexter had discussed it prior to
 9 him attending, because at the same time it came out he
 10 had attended the specialist course and I'd been given an
 11 insight into the training, suggested he read it, so it
 12 was probably a combination of both because I was aware
 13 of the plan but I understood that that yet was to be
 14 trained out.
 15 Q. So I think I've understood you. Your position is that
 16 you were working to SOP 47 v5 --
 17 A. Yes.
 18 Q. -- the Giladi document, but you were aware of the
 19 Whittle plan as well?
 20 A. Yes.
 21 Q. So you had both in mind at the time?
 22 A. Yes, that would be fair to say.
 23 Q. This in no sense is a criticism of you, but I'm certain
 24 you can understand that many would think it
 25 unsatisfactory that that night, some thought that v5 was

16

1 in force, some thought the Whittle plan was in force,
 2 and you had regard to both of them?
 3 A. That's correct, yes.
 4 Q. That was the conversation with Chief Inspector Dexter.
 5 At 23.10 hours, so very shortly indeed, seconds, after
 6 the end of that conversation, you called Chief Inspector
 7 Buckle?
 8 A. Correct, yes.
 9 Q. We know that she was the on-duty cadre TFC, and is it
 10 the position, therefore, that the scheme of command
 11 anticipated that she would take the role of TFC?
 12 A. Yes, that's correct.
 13 Q. But instead, you had decided, in consultation with
 14 Chief Inspector Dexter, that you would take that role?
 15 A. Yes.
 16 Q. Why did you decide in effect to replace her?
 17 A. I had a short conversation with Rachel, I informed her
 18 that I was coming in, mainly to take over the role as
 19 the tactical firearms commander in the CTPOR, OS
 20 OS. I asked her --
 21 I think at that time we discussed about the potential of
 22 arrival of some sort of specialist assets to support the
 23 police operation. I then agreed with her that actually,
 24 as it was a CT operation, it was likely to involve
 25 potentially some advanced tactics and that I would take

1 the role of TFC, so when I arrived at the control room,
 2 and she would assist me, which she agreed with, and then
 3 later on, when the CTPOR eventually opened, be it
 4 an hour or two later, I would then move to the CTPOR.
 5 Q. You were a specialist TFC?
 6 A. That's right.
 7 Q. As we also know, Chief Inspector Buckle did not have
 8 that additional qualification.
 9 A. Yes.
 10 Q. Was it necessary that the person who was TFC in the
 11 CTPOR -- sorry about all the acronyms, sir -- was it
 12 necessary that that person should have the specialist
 13 qualification?
 14 A. Yes.
 15 Q. So that could not be her, it needed to be someone else?
 16 A. It would be someone else, yes, a specialist.
 17 Q. And moreover, I think you're saying to us that the
 18 nature of this incident indicated to you that the type
 19 of tactics that might be necessary to deploy were ones
 20 that a specialist would be familiar with and
 21 a non-specialist might not be?
 22 A. Yes.
 23 Q. So that made you suited to that role, TFC at
 24 headquarters, in a way that she was not?
 25 A. Yes.

1 Q. But I think you would wish to be clear that in deciding
 2 that you would take that role, not Chief Inspector
 3 Buckle, you don't in any sense indicate that you lacked
 4 confidence in her abilities?
 5 A. Absolutely not. Probably it was a very short,
 6 professional conversation that at the time, because of,
 7 if you look at things like -- I was working to SOP 47,
 8 it talked about resilience of command, firearms
 9 commanders working together, and then ultimately at some
 10 stage I would have to move on to the CTPOR, so there was
 11 never a question about Rachel's competence, it was more
 12 about trying to put a resilient firearms command plan in
 13 place and that was probably a decision and conversation
 14 that happened very quickly.
 15 Q. And indeed, as you're going to tell us, in due course
 16 that night, you did move to the CTPOR?
 17 A. That's correct, after it opened after 3 am.
 18 Q. Just to be clear, we're not going to be mentioning the
 19 location of the CTPOR or really anything about the way
 20 in which it operated. What we do understand is that
 21 it's about managing a counter-terrorism operation?
 22 A. Yes.
 23 Q. Including subsequent arrests and so on?
 24 A. That's correct, yes.
 25 SIR JOHN SAUNDERS: Are you moving from the decision now?

1 MR GREANEY: Not quite, sir. But if you have a question to
 2 ask.
 3 SIR JOHN SAUNDERS: No, you tell me. I'd hate to ask your
 4 next question for you.
 5 MR GREANEY: What I was going to ask -- and we'll see if
 6 it's going to be chairman's question -- was this: the
 7 upshot is that on the night of 22 May, two of the
 8 officers who performed crucial roles, so the TFC and the
 9 GATFC, were not on duty and were not on call --
 10 A. Yes.
 11 Q. -- but instead, they self-deployed, you and Mr Dexter?
 12 A. Yes.
 13 Q. Does that, to your mind, demonstrate anything about the
 14 adequacy at that time of the GMP on-call system?
 15 A. No.
 16 Q. You took a moment before answering that question. Is
 17 there some qualification?
 18 A. I think it's the description of an MTFA, this is an
 19 extraordinary event, and it was an extraordinary event.
 20 It's probably very difficult to keep a cadre of
 21 commanders who are specialist TFCs available to respond
 22 so quickly. I think GMP, by the fact that it could get
 23 specialist commanders within a control room in an hour
 24 or an hour and a half, or whatever it took, would
 25 probably put GMP in a very good position nationally

1 compared to some forces. So I think on the night, the
 2 way it developed, with myself and Mark being available,
 3 that hopefully enhanced the operation, but that doesn't
 4 say that Rachel's capability and some of the other
 5 commanders wouldn't have been as acceptable or as good
 6 on the evening.
 7 Q. That I understand. But the fact that people as
 8 competent as you and Chief Inspector Dexter ended up in
 9 those roles might be thought to be a matter of chance,
 10 the chance being that Chief Inspector Dexter had an
 11 arrangement with his constable and had his phone on, and
 12 that you had your phone on. Some might say that getting
 13 the best people in post ought not to depend upon matters
 14 of chance.
 15 A. Yes, I'd agree with that, yes.
 16 Q. This is something that you did in fact write about in
 17 your learning paper, to which we are going to come. Was
 18 it your view in the aftermath of these terrible events
 19 that there ought to be a system which involved
 20 specialist firearms commanders, at least one of them,
 21 being on call?
 22 A. Yes.
 23 MR GREANEY: Sir, I'm going to ask one more question about
 24 being on call, but I have more or less --
 25 SIR JOHN SAUNDERS: Okay. Just dealing with that topic: you

1 need a specialist in the CTPOR, you were telling us,
 2 with CT-type training --
 3 A. Yes.
 4 SIR JOHN SAUNDERS: -- which Chief Inspector Buckle didn't
 5 have, so she couldn't have done that; was there someone
 6 on call to carry out that job?
 7 A. No.
 8 SIR JOHN SAUNDERS: Isn't that a failing in the system?
 9 A. Potentially, sir, yes. It was part of the feedback.
 10 I think that --
 11 SIR JOHN SAUNDERS: If you mean, potentially, yes, they
 12 might not have got a volunteer like you to come in,
 13 I understand. That could be a failing in the system,
 14 couldn't it?
 15 A. Yes. I think there should be a national system around
 16 specialist TFCs that would be, I think, very relevant
 17 nationally. I think the numbers of specialist TFCs are
 18 such that GMP was probably in a very luxurious position
 19 on the night, but not all forces are in the same -- so
 20 it would probably be a cadre that's regional or national
 21 as opposed to just a force.
 22 SIR JOHN SAUNDERS: The other thing I was going to ask
 23 related actually to the downside of you replacing
 24 Chief Inspector Buckle, which we have heard about, which
 25 meant that the FDO was not relieved of that

1 responsibility for a significant period more than he
 2 needed to be --
 3 MR GREANEY: Yes, we are coming to this point, sir, in some
 4 detail in due course when we reach the chronology, but
 5 I don't want to cut across you.
 6 SIR JOHN SAUNDERS: That's fine. We'll deal with it in some
 7 detail when we come to it in the chronology.
 8 MR GREANEY: This is, no doubt, something you've had in
 9 mind --
 10 A. Yes.
 11 Q. -- the period during which the FDO was the ITFC? I do
 12 want to ask you about that.
 13 SIR JOHN SAUNDERS: And it was in your mind when you made
 14 this decision to have this discussion with
 15 Chief Inspector Buckle?
 16 A. The length of time of handover, sir?
 17 SIR JOHN SAUNDERS: When you were talking to her on the
 18 phone, as to who was it most sensible --
 19 A. It wasn't at the forefront of my mind, albeit probably
 20 after the conversation my expectation was that Rachel
 21 would contact the FDO and then obviously make
 22 arrangements around does she want to take over command
 23 herself in the interim or was the FDO happy to keep
 24 command. Because the passage of any command is quite
 25 complicated in a firearms operation, it's not just,

1 "You've got command now". There are a number of
 2 assessments and strategies and taking actual situational
 3 control of the situation or the operation that would
 4 then embed the new TFC into the role. So it's not
 5 something that can be done in a couple of minutes, it
 6 was done very quickly on the night when I actually
 7 arrived -- so I think SOP 47 does say sometimes it's not
 8 practical for the FDO to actually hand over command of
 9 a firearms operation but it should be done as soon as
 10 practicable.
 11 Nothing I said to Rachel meant that she shouldn't
 12 speak to the FDO. I didn't know what position the FDO
 13 was in, quite rightly, so if the FDO had been dealing
 14 with multi-site attacks I would probably have expected
 15 Rachel to take command. Notwithstanding that, I did
 16 hear her evidence and I understand why she made the
 17 decision not to, but I assume that would have been in
 18 consultation with the FDO and the SFC.
 19 SIR JOHN SAUNDERS: Thank you.
 20 MR GREANEY: I want to come on to ask you more about that in
 21 a few moments. Before that I want to ask you one more
 22 question about on call and then pick up the chronology
 23 that takes us to your arrival at force headquarters.
 24 It's slightly out of place, but it does fit with the
 25 on-call issue. Did the events of the night of the 22nd

1 demonstrate to you, not just something about the
 2 calling —out of specialist TFCs, but also about the
 3 calling —out of the handlers of explosives dogs?
 4 A. Yes. It did, yes.
 5 Q. Again, this is something that you wrote about in your
 6 very helpful learning paper. Were there any problems to
 7 your mind with sourcing explosives dogs on the night?
 8 A. Yes.
 9 Q. In simple terms, did it take too long to get dogs there
 10 in numbers —
 11 A. Yes.
 12 Q. — for the important job of ensuring that there were no
 13 secondary devices?
 14 A. Yes, that's correct.
 15 Q. As a result, was it your view that there ought to be in
 16 place a better system for ensuring that there was on
 17 call at all times a cadre of handlers of such animals?
 18 A. Yes.
 19 Q. I've mentioned your learning paper twice already. To be
 20 fair to you, we ought to acknowledge that in the
 21 aftermath of the arena attack, you reflected to a very
 22 considerable extent upon what had gone well and what had
 23 not gone well, did you not?
 24 A. That's correct.
 25 Q. And you also consulted other people?

25

1 A. Yes. Following the attack itself, I was approached by
 2 a number of officers under my command. We discussed
 3 some of the quick — what we identified as quick pieces
 4 of learning. So I set a number of parameters on the
 5 learning paper, which you may wish to talk about later,
 6 to try and capture some learning really quickly to try
 7 and make an operational difference to the officers
 8 delivering tactics on the ground. That was the original
 9 concept of the paper.
 10 Q. It might be thought that you identified problems more
 11 accurately and more quickly than some of the other
 12 processes but we will get to the learning paper in due
 13 course.
 14 Let's pick up the chronology. Having spoken to
 15 Chief Inspector Dexter and Chief Inspector Buckle, did
 16 you then travel to the command suite at force
 17 headquarters?
 18 A. Yes.
 19 Q. As you'll appreciate, I'm certainly not going to ask you
 20 where you travelled from, but we do know that at
 21 23.40 hours, shortly before your arrival,
 22 Chief Inspector Dexter updated Gold, who was already at
 23 force headquarters, and made it plain that you were
 24 coming in.
 25 A. Yes.

26

1 Q. And you then arrived about 5 minutes later at
 2 23.45 hours.
 3 A. Yes.
 4 Q. Did you, upon arrival, start something called the TFC
 5 policy file and decision log?
 6 A. Yes.
 7 Q. First of all, tell us what that document is, please?
 8 A. It's the tactical firearms commander's operational
 9 record of the firearms operation. As an incoming
 10 firearms commander what that log does, it ensures you go
 11 through a process to actually take over a firearms
 12 operation, so it's based on what are the — I first
 13 assess what the intelligence is, what the current
 14 threats are, what tactical options do we have to deliver
 15 the SFC's strategy, and then obviously then what actions
 16 and what is the actual tactical plan that I'm going to
 17 implement to ensure a firearms operation is in place.
 18 So it's around things like resourcing, command and
 19 control, locating myself in a position where I can take
 20 command of the operation and effectively know what's
 21 going on to enable myself to deliver tactics on the
 22 ground.
 23 Q. Obviously, the documenting of decisions is important.
 24 A. Yes.
 25 Q. Particularly in circumstances in which you're going to

27

1 be deploying armed officers who may shoot and kill
 2 someone. But when you arrived at headquarters and you
 3 then had a make an entry in that log, do you have to
 4 physically type in it or did you have a loggist?
 5 A. Yes. I had to physically type into that log, yes.
 6 Q. Did that take you away from what might be thought to
 7 have been the rather more important job of actually
 8 commanding what was happening?
 9 A. Yes, but at some stage I've got to get myself in
 10 a position where I can assess what the threat is because
 11 at some stage I'm going to have to articulate that to
 12 other officers and because it's that complicated
 13 a threat assessment and working strategy, the only way
 14 I ever found to be able to do that would be writing it
 15 down or recording it somewhere to then be able to
 16 deliver it clearly to firearms officers, because that
 17 briefing obviously need to be quite clear.
 18 So, yes, it is a very administrative and
 19 time-consuming process, but I think it's a very
 20 important one, but interestingly in relation to firearms
 21 command I record my documentation myself, but in public
 22 order command I have a loggist that will do that for me.
 23 Q. So this is exactly what I was going to ask you about
 24 next, namely whether there is a better way of doing it
 25 than you, the TFC, sitting down at a computer. One way

28

1 would be for you to have a loggist?
 2 A. Yes.
 3 Q. And was there a reason why you didn't have a loggist
 4 that night?
 5 A. Firearms commanders at that stage, to my knowledge, had
 6 never had loggists.
 7 Q. Is it a good -- I don't know at the moment what the
 8 position is currently, but is it a good idea that they
 9 should have loggists?
 10 A. Yes, and interestingly, in the following days when
 11 I worked in the CTPOR, we then created the role of
 12 loggist and had someone logging some command decisions
 13 for us, which was very useful.
 14 Q. Or alternatively, or maybe just in addition, we know
 15 that Mr Sexton and Mr Dexter both had dictaphones.
 16 Would it have saved time if you'd had either a loggist
 17 or a dictaphone that you could use to record your
 18 decision-making?
 19 A. At the time I didn't have a dictaphone. I think
 20 a dictaphone would have very useful for me to articulate
 21 my thoughts and obviously conversations I was having,
 22 but I don't think that would have helped with any
 23 briefing or handover only because physically
 24 a dictaphone would only be recording decisions and
 25 I would still have to write something down somewhere to

1 enable me to articulate that to firearms officers.
 2 Q. I understand. It sounds like a loggist is probably the
 3 best solution?
 4 A. A capable loggist would be very useful, yes.
 5 Q. And if you had had a loggist that night would it have
 6 saved you some time?
 7 A. It would have, yes.
 8 Q. I don't think it's very controversial to suggest that in
 9 a situation such as that with which you were dealing,
 10 every minute, if not every second, counts?
 11 A. Yes.
 12 Q. We will have a look at the policy file and decision log,
 13 really just so it's in evidence in case it's important
 14 in due course. I'm not going to press you on any of the
 15 detail of it. Could we have on the screen
 16 {INQ029139/35}.
 17 Is that the first entry that you made in the log
 18 timed at 23.50 hours?
 19 A. Yes.
 20 Q. Setting out the intelligence, your threat assessment,
 21 the working strategy, powers and policy, and tactical
 22 options and action?
 23 A. Yes.
 24 Q. Over the page, please, {INQ029139/36}, where we go to
 25 the next entry that I'll come to in due course.

1 A. Could I just clarify that what happens with these logs
 2 and the way I would do them -- I would go into the
 3 operational log at the back, start to populate that,
 4 which gives you a timed chronology as best you can, like
 5 a contemporaneous record of timings, but the actual
 6 document is a lot thicker. So for example, some of the
 7 detail around capabilities of subjects is contained in
 8 a different part of the document, so this is like an
 9 operational -- this is something I can brief people
 10 from, but the actual document itself is actually a lot
 11 thicker and a lot bulkier that I would go back and fill
 12 in as and when I had time.
 13 Q. I understand, thank you. We can take that down --
 14 SIR JOHN SAUNDERS: Can we go back to {INQ029139/35}.
 15 Midway down, we've got the working strategy.
 16 A. Yes.
 17 SIR JOHN SAUNDERS: Is that something that Gold actually
 18 sets? Are you just copying out something she's done or
 19 was that you doing your own strategy?
 20 A. What would normally happen, sir, certainly in
 21 a pre-planned operation, the Gold will set the strategy
 22 and then I would work to the Gold strategy. In
 23 a spontaneous firearms operation, as this was, I can
 24 work to my own -- I can develop my own strategy,
 25 instigate tactics and then, when practical, refer to

1 Gold, and then change, obviously, accordingly. Those
 2 conversations never took place other than -- probably
 3 because of the nature of the fast-moving operation.
 4 SIR JOHN SAUNDERS: I can understand how in pre-planned then
 5 working from a strategy which has been fixed by Gold is
 6 easier. I thought that was meant to be what happened in
 7 a spontaneous strategy as well. I mean, Gold was there;
 8 she would have done a strategy, wouldn't she?
 9 A. Yes, she will have done one. I think -- if you imagine
 10 that when I came into the control room, I had a very
 11 brief conversation, I believe, with ACC Ford, who was in
 12 conversations with I think the chief constable, the
 13 deputy, and other stakeholders and partners. It's
 14 probably something, although it wasn't picked up in any
 15 learning document, I think certainly the relationship
 16 between the tactical firearms commander and the
 17 strategic firearms commander is very complicated when
 18 the strategic firearms commander has got multi-tasks on
 19 the night. So yes you're absolutely right, sir,
 20 I should be working to her strategy but at the time if
 21 I don't have access to the Gold or the SFC, then I will
 22 develop a strategy myself which is basically maintain
 23 public safety -- I think under the MTF A SOP guidance
 24 there are strategies around confronting subjects,
 25 maintaining public safety, et cetera.

1 SIR JOHN SAUNDERS: It just seems if Gold is going to do
 2 a strategy, she would have it typed out somewhere and
 3 actually just the document can be given to you as you
 4 arrive, "Here's the strategy, work out the tactics".
 5 I just think -- isn't that meant to be the theory?
 6 A. It is the theory, sir, and I think that --
 7 SIR JOHN SAUNDERS: But in practice, not so easy?
 8 A. I think what you find is and probably one my -- not
 9 frustrations on the night because I had worked with
 10 ACC Ford, who was a very competent firearms commander.
 11 But I think that on that night, as well as being the
 12 SFC, there were a number of other demands on that
 13 particular role.
 14 MR GREANEY: Just to come back to a point that you made, we
 15 know that the working strategy of Gold was recorded, it
 16 was written down in the notes of the staff officer or
 17 the acting chief constable, as she was.
 18 I'm going to turn next to ask you some questions
 19 about the point that the chairman explored a little
 20 earlier, namely the delay in the FDO being replaced as
 21 TFC. But first I want to ask you a little about the FDO
 22 role. Had you ever performed that role yourself?
 23 A. No.
 24 Q. Were you aware on 22 May that the likely point of
 25 failure in the event of an MTFA was the FDO?

1 A. No.
 2 Q. You had every chance, if there was an MTFA, of being the
 3 TFC, do you agree, as a specialist?
 4 A. Yes.
 5 Q. Were you not told after Winchester Accord about the
 6 problem that had been highlighted with the overburdening
 7 of the FDO?
 8 A. No.
 9 Q. And were you not told after the HMIC visit of the
 10 problem with the FDO?
 11 A. No.
 12 Q. Again, this can be no criticism of you because you can't
 13 know what you don't know, I suppose, but do you agree
 14 that that was information that you should have known?
 15 A. Yes.
 16 Q. When you arrived in the command suite, Chief Inspector
 17 Buckle was already present?
 18 A. Yes.
 19 Q. And indeed we know that she had been there since,
 20 I think, about 23.25 hours. At 23.43, she spoke to the
 21 FDO and he was asking about when he would be relieved of
 22 the TFC duty and, as he explained to the inquiry, he was
 23 desperate to be relieved at that stage.
 24 A. Yes.
 25 Q. But as we now know that hadn't happened at 23.25 --

1 A. Yes.
 2 Q. -- when Chief Inspector Buckle arrived. It didn't
 3 happen at 23.43, during the call or shortly afterwards,
 4 and in the end the FDO was not relieved of his TFC
 5 responsibilities until 00.15 or just afterwards. I'll
 6 just ask you an open question: was that unsatisfactory?
 7 A. Yes.
 8 Q. Particularly bearing in mind what we now know about the
 9 risk of the FDO being overburdened and what the chairman
 10 might find the fact of him being overburdened that
 11 night, is that particularly unsatisfactory that he was
 12 not earlier relieved of that important responsibility?
 13 A. Yes.
 14 Q. Why was he, to your mind, not relieved of that
 15 responsibility earlier?
 16 A. I think that on reflection -- I spoke to Rachel, as
 17 I said, and my thoughts were that Rachel would make
 18 contact with the FDO to discuss any handover plan or,
 19 notwithstanding that, I understand why Rachel didn't
 20 take over because of the complications of potential two
 21 quick changeovers of command. My view is that when
 22 I arrived at 23.45, I spoke to Rachel, I very briefly
 23 spoke to -- assessed what was going on, had there been
 24 an incident that developed probably between 23.45 and
 25 23.50, although I wasn't the firearms commander and it

1 had been spontaneous, then I would have probably tried
 2 to take command from the FDO.
 3 Notwithstanding that, on reflection, I suppose when
 4 I spoke to Rachel earlier in the evening, was there
 5 necessity for me to take the TFC role at that particular
 6 conversation, it may have been better if I let Rachel
 7 just take the role and then me to join her later and
 8 obviously create a command structure when I arrived as
 9 opposed to perhaps complicating the issue by phoning
 10 Rachel before.
 11 But just to clarify at no stage did I say to Rachel
 12 do not phone or take over from the FDO, that is probably
 13 a professional decision for firearms commanders under my
 14 assessment to have that particular conversation between
 15 themselves. And if the FDO felt they were overburdened
 16 then maybe that was a conversation to have with Rachel.
 17 Q. So at the very least I think this is something we need
 18 to learn from in terms of future?
 19 A. Yes.
 20 SIR JOHN SAUNDERS: Can you give me some idea of what the
 21 handover involves? You clearly need situational
 22 awareness before you can take over.
 23 A. Yes.
 24 SIR JOHN SAUNDERS: Some idea of what the assets are that
 25 are there at the scene?

1 A. Yes, I think in relation to -- in relation to the
 2 tactical firearms commander before they take control or
 3 command, they should be in a position they can
 4 communicate, they have situational awareness, they're
 5 aware of what the assessment of threat is and obviously,
 6 you're quite right, what tactics and what assets they
 7 can command and control. Now, even when I took over,
 8 I think when you look at my operational log and
 9 certainly if you were to listen to some of the radio
 10 traffic, that takes a significant amount of time even
 11 though it's handed over, sir.

12 For a pre-planned tactical firearms operation,
 13 sometimes there can be a significant amount of planning.
 14 Taking over from the force duty officer, I probably
 15 wasn't aware of what their strategy was or anything like
 16 that, so I have to sort of build the plan from the
 17 ground up based on my assessment of what the threat is.

18 I was also conscious, probably by arriving at the
 19 time I did, that the officers on the ground probably
 20 hadn't had a briefing, so it does put pressure on me,
 21 arriving 1 hour and 15 minutes or 1 hour and 20 minutes
 22 into an incident to try and really get a grip on the
 23 firearms operation which by that time, no reflection on
 24 anyone, there were a lot of people on the ground, there
 25 were a lot of moving parts, there were a lot of vehicles

1 that were being seen, a lot of reports of second
 2 offenders, which is even then born out in my record of
 3 some of the confusion that was going on with the various
 4 radio channels.

5 SIR JOHN SAUNDERS: Thank you.

6 MR GREANEY: I think out of fairness to you we need to
 7 recognise that we now know that what happened that night
 8 was one man, assisted by another, detonating a bomb.
 9 But that night, when you were in the moment, you didn't
 10 know that that was what it was or you thought that there
 11 were or might be other situations that were developing.

12 A. That's correct because when I took or came into the
 13 control room at about 1 hour and 15 minutes -- I mean,
 14 at the time I thought to myself in relation to Plato,
 15 and for example the Paris attack, that started with an
 16 explosion followed by a firearms attack followed by
 17 a siege and that was a period over 3.5 hours. This was
 18 1 hour and 15 minutes into the incident. So there's
 19 certainly time -- I felt at that time there was an
 20 unknown threat.

21 Q. And, of course, Mumbai had evolved over an even longer
 22 period.

23 A. Yes, that's correct.

24 Q. I'm going to turn next to your actions on arrival and
 25 along the way I want to get your impressions of what was

1 actually happening within the command suite.

2 But having arrived at 00.05, you broadcast a message
 3 on the radio asking the ground--assigned tactical
 4 firearms commander to telephone you and you were saying
 5 at that stage that you were about to take command and
 6 control?

7 A. Correct, yes.

8 Q. For the transcript, that's line 9083 of the emergency
 9 response sequence of events.

10 And he did then, almost straightaway, call you back?

11 A. Yes.

12 Q. Why was it that you had made that call to
 13 Chief Inspector Dexter?

14 A. Because I realised at the time he was the
 15 ground--assigned tactical firearms commander, he was
 16 employed at what I would call main seat of threat, which
 17 was around the arena and Victoria Station, and it was to
 18 try and get situational awareness from him and to agree
 19 command protocols. So as the ground--assigned tactical
 20 firearms commander he is working to me, but we need to
 21 agree what the relationship is and what responsibility
 22 for resources he has and how he's going to deliver my
 23 plan.

24 Q. We have seen the communication that he has with you and
 25 he provided you with considerable information

1 efficiently?

2 A. Yes.

3 Q. That was at 00.05 and you had arrived at 23.45, and the
 4 obvious question therefore is: what had you been doing
 5 in the 20 minutes between arrival and speaking to
 6 Chief Inspector Dexter?

7 A. On arrival, I'd have made my way to the control room,
 8 I would have then gone to a computer to set myself up in
 9 a position where I got communications, so I had to get,
 10 I think, a new battery for the radio at the time. I had
 11 to set myself up on a computer and tried to work out --
 12 after speaking to Rachel, trying to get some awareness
 13 of what was going on in the control room to get the
 14 context to start to enable me to start to complete and
 15 do an assessment on the threats and overall review of
 16 the firearms operation, which I said isn't a few seconds
 17 of a job, it's probably a significant period of time to
 18 do that. Notwithstanding, that had anything happened
 19 and anything developed really quickly, I could have
 20 jumped in and taken some sort of command and control.
 21 But to develop that awareness, it probably takes 10 or
 22 15 minutes and to work out what the threat assessment
 23 is.

24 SIR JOHN SAUNDERS: And Chief Inspector Buckle would have
 25 all this information by then?

1 A. The other... No, she didn't. I don't know what her
 2 activity was prior, I've never discussed that, sir. But
 3 interestingly, one thing I should add here is when
 4 I arrived, I did ask whether there were some specialist
 5 assets on the way, which I then asked Chief
 6 Inspector Buckle to start making relevant calls which
 7 she did. Because, although I've never looked into it
 8 since, I'm led to believe some of those calls had not
 9 been made previously.

10 MR GREANEY: Subsequently Mr Dexter was to raise a concern
 11 with you, and indeed with others, about the position
 12 that he was placed in that night. I'm not going to ask
 13 you to guess at what I'm talking about, we'll put it on
 14 the screen. This is your learning paper. How quickly
 15 after the incident did you prepare this paper, do you
 16 think?

17 A. It was probably within days of the incident. What
 18 happened was, just to give the context of the paper --

19 Q. Yes, please do.

20 A. I was approached -- it was probably a week after the
 21 incident, I'd spoken to some staff who had been
 22 operationally deployed in the arena on the night,
 23 I think you've heard from one of those, Sergeant
 24 Kam Hare, and a few of the issues they raised. What
 25 I did was I decided to capture some of that operational

1 learning very quickly to see if we could make some
 2 improvements in the unit around things like equipment,
 3 vehicles, the sort of things in my gift to change. So
 4 I asked some officers, who were very keen to get
 5 involved, to go out and do some research. I gave them
 6 the criteria around things like how did communications
 7 on the night, resourcing, call-out lists, the sort of
 8 things that could add quick value. So I did that piece
 9 of work.

10 After 7 to 10 days there was a force email sent out
 11 saying all debriefs are meant to stop and they'll be
 12 picked up centrally. I think my debrief lasted a number
 13 of days after that and then, once it had completed,
 14 I submitted that to the force.

15 Q. I'm going to ask that we put that on the screen. There
 16 will be a number of aspects of it that I'll ask you
 17 about, indeed I have done so already.

18 The reference is {INQ029095/2}. We can see it is
 19 headed:
 20 "Greater Manchester Police specialist operations
 21 branch."

22 It is actually headed "learning paper" and it is a
 23 review for you, compiled by two of your constables?

24 A. That's correct.

25 Q. If we could go to the top of {INQ029095/6}. I was

1 asking you about a concern that Mr Dexter had raised:
 2 "Mr Dexter felt that on the night he attended the
 3 scene and took more of a major incident commander's role
 4 rather than being given the support to concentrate on
 5 what he feels should have been his priorities within the
 6 role of ground--assigned TFC. There were no other senior
 7 officers present at the scene to take that role, leaving
 8 him to try and conduct both roles to the best of his
 9 ability."

10 I know you saw his evidence and he explained that
 11 concern and indeed he had previously expressed it in
 12 statements.

13 I am not going to ask you about the interesting
 14 debate about whether the JOPs and other documents
 15 indicate that Silver should be at the scene, but I will
 16 ask you whether you understood that concern that
 17 Mr Dexter expressed about effectively having a dual role
 18 at the scene.

19 A. On the night itself, I wasn't aware that he was engaged
 20 doing that role. I was aware there was a number of
 21 calls going into him from other people, albeit ACC Ford,
 22 at the time, or Superintendent Hill that were probably
 23 non--firearms related. But at that time, I was probably
 24 too occupied around the wider firearms issues to
 25 actually ask what sort of support he was getting there.

1 My assumption was there were other commanders there
 2 supporting him.

3 Q. I'm probably not doing it justice, but you'll understand
 4 that his concern was:
 5 "I was there as the ground--assigned tactical
 6 firearms commander".

7 A. Yes.

8 Q. "That may involve me utilising unarmed assets to the
 9 benefit of my firearms strategy."

10 A. Yes.

11 Q. "But beyond that, the unarmed assets ought to be the
 12 responsibility of another commander at the scene."

13 A. Yes, and I agree with that, and it's actually
 14 reflected -- when you've put my firearms operation log
 15 in, or you did before, in my threat assessment, my
 16 threat assessment in detail looks at both armed officers
 17 and unarmed police officers and stakeholders and other
 18 emergency service partners. I don't have command and
 19 control of, for example, the Fire Service, but as
 20 a firearms commander, when those people enter the area
 21 of operations, I obviously have some responsibility for
 22 their safety. And if that's through a Stay Safe
 23 briefing or ensuring there is a cordon to effectively
 24 keep them out, they must be in my mindset, so that's in
 25 relation to myself as the commander. So in relation to

1 Mark Dexter, yes, he should be able to have some control
 2 of them as and when they come into the sphere of his
 3 influence or operation, but he shouldn't have line
 4 management or command and control of them as and when
 5 they're going about their tasks. That's how I would
 6 understand it from a firearms --- for this operation.
 7 SIR JOHN SAUNDERS: There is this gap, which you learn about
 8 afterwards ---
 9 A. Yes.
 10 SIR JOHN SAUNDERS: --- for your ground--assigned commander on
 11 the scene who's actually operating it? Why doesn't this
 12 become apparent when you're all together in the Silver
 13 control room? Isn't it the purpose of this, that those
 14 sort of problems actually get identified?
 15 A. Yes, I totally agree, sir. Just to put it into context,
 16 I was very experienced in working in a Silver control
 17 room, a multi--agency control room for a number of big
 18 events. I think that probably just the pace of this
 19 spontaneous incident --- I probably had a conversation
 20 with Superintendent Hill, who was the Silver commander,
 21 probably a couple of times over several hours, and I am
 22 physically at my desk, this side of the room, and Chris
 23 is physically at his desk on that side of the room, and
 24 the only way that that can get pulled together is by
 25 having round--the--room conferences and getting updates

1 from each other, which we didn't have one until about
 2 2 o'clock just because of the pace of the operation.
 3 But actually the reality is when you do have these
 4 round--the--rooms, things are very busy and they sometimes
 5 take you away from what you're doing. So you're
 6 absolutely right, sir, it's a very difficult task to
 7 ensure there is communication. Although you are
 8 co--located, it doesn't always mean communication is very
 9 good.
 10 SIR JOHN SAUNDERS: We can all understand the practical
 11 difficulties. What's maybe of more concern is the
 12 system is designed apparently to deal with these
 13 practical difficulties, but when it actually comes to it
 14 happening, it doesn't.
 15 A. No, I think it's --- I agree, sir. I think sometimes
 16 it is easier to communicate when you're on the ground
 17 face to face at times rather than in a control room
 18 because you've got desks, you've got 30 or 40 people sat
 19 there, whereas on the ground sometimes there may only be
 20 three or four of the doers, the commanders, that
 21 actually make the decisions that can get together and
 22 see each other. So sometimes there are advantages to
 23 being on the ground, but there's a lot of advantages to
 24 being in the control room, but communication is always
 25 very difficult.

1 And different radio channels make it difficult
 2 because if you look at the firearms command channel,
 3 that is different to the Silver command unarmed channel,
 4 which is different to the Fire and Rescue Service
 5 channel which is different to the Ambulance Service
 6 channels.
 7 MR GREANEY: What ought to happen is there should be
 8 co--location and communication at the scene ---
 9 A. Yes.
 10 Q. --- and in the control room?
 11 A. Yes, as I understand it, yes.
 12 MR GREANEY: Sir, I'm going to move to a slightly different
 13 topic, I don't know if you have any further questions
 14 about the control suite.
 15 SIR JOHN SAUNDERS: Did it operate well, in your view, on
 16 the night?
 17 A. Yes, I think it did operate well, sir. But it's always,
 18 as you've pointed out, very difficult in some areas
 19 around communication. I think that obviously coming to
 20 that location, the quicker that commanders can get
 21 there, the better, and share that situational awareness.
 22 If they don't get there for the first, 1, 2, 3 hours,
 23 then that makes it more difficult.
 24 SIR JOHN SAUNDERS: I'm afraid I've forgotten when fire got
 25 there.

1 MR GREANEY: 2 hours and 6 minutes after the explosion, so
 2 about 00.37.
 3 SIR JOHN SAUNDERS: So were you aware that fire were not
 4 there?
 5 A. No, I wasn't, sir, no. I didn't have any contact with
 6 the --- I remember seeing someone from the
 7 Ambulance Service, but I didn't have any discussions
 8 with any of the partner agencies.
 9 SIR JOHN SAUNDERS: You don't have a formal meeting until
 10 about 4 o'clock?
 11 MR GREANEY: 4.15 was the first SCG.
 12 A. I think there's actually a Silver room update about
 13 2/2.30, I think it is, on my firearms log.
 14 SIR JOHN SAUNDERS: How does that work? Just tell me in
 15 practical terms how that works.
 16 A. Basically the Gold commander and the staff officer give
 17 an update where they --- and they'll go round each
 18 commander or each agency and say --- Craig, maybe from
 19 the firearms view, Chris from the Silver point of view,
 20 and we just go round, like a round--the--room, and that's
 21 the way the update works.
 22 SIR JOHN SAUNDERS: Is that any different from having
 23 a formal meeting?
 24 A. Probably the formal meeting is probably one that would
 25 take place separately, it'd be minutes, there'd be an

1 agenda, and things like that. This is what we call just
 2 a round—the—room. Sometimes you have them every hour,
 3 every 30 minutes. This was probably slightly delayed by
 4 the pace of what was going on. But there is no set time
 5 for those or no set —
 6 SIR JOHN SAUNDERS: Shouldn't it actually have taken
 7 priority? I know other things are going on, but
 8 actually finding out — getting everyone's awareness of
 9 what's going on and what they are doing and how they are
 10 cooperating together is essential, isn't it?
 11 A. It is, sir, and I think that it goes back probably to
 12 what I said a number of moments ago just around the role
 13 of the Gold commander who would normally sort of control
 14 that sort of pace of meetings. They are carrying out
 15 multiple tasks of trying to be the strategic firearms
 16 commander, the Gold commander, quite rightly briefing
 17 senior stakeholders, doing SCGs. It is quite
 18 a difficult — there may well be a role for — they have
 19 a staff officer, there may well be a role for the Gold
 20 support or something like that there.
 21 SIR JOHN SAUNDERS: Strategic firearms. This is not running
 22 down ACC Ford or anything like that, but what is she
 23 actually having to do when you're there doing your job
 24 as strategic firearms commander?
 25 A. What should happen is the strategic firearms commander

1 obviously sets the strategy and what should happen is —
 2 SIR JOHN SAUNDERS: So she sets the strategy which you never
 3 get?
 4 A. That's right.
 5 SIR JOHN SAUNDERS: So you do it again for yourself?
 6 A. Yes. Obviously when I come up and look at particular
 7 tactical options, I should go back and feel the criteria
 8 for the deployment of officers is met. In a pre—planned
 9 operation I should go back to the strategic firearms
 10 commander, in a spontaneous I should deliver the tactic
 11 and then go back and report to the strategic firearms
 12 commander.
 13 On that night it was probably difficult because
 14 there was just a number of tactics, a number of
 15 deployments, which meant that when I spoke to ACC Ford,
 16 it was probably very sporadic and very periodical.
 17 SIR JOHN SAUNDERS: And you're doing it, I just want to —
 18 she's got lots of different tasks. I just wanted to
 19 know in practical terms what being the strategic
 20 firearms commander actually required her to do.
 21 A. It should have been — it's a role that should be a lot
 22 more supportive of the tactical firearms commander
 23 because ultimately if there is an incident involving the
 24 discharge of a police firearm, which obviously is
 25 a serious consideration itself, then obviously the

1 tactical firearms commander would probably want the
 2 support of knowing that any plans that he'd had had been
 3 tested against the —
 4 SIR JOHN SAUNDERS: Sorry, Mr Thompson, we all started this
 5 because I was saying why didn't you have earlier
 6 round—the—room conversations which were so important.
 7 And you said: well, the Gold has a lot of other things
 8 to do and one of them is she's the strategic firearms
 9 commander. And I just wanted to know not what could
 10 have happened or should have happened but what on the
 11 night she was actually having to do as strategic
 12 firearms commander.
 13 A. I probably had little contact in that particular
 14 context, but what was actually happening as well is
 15 while all the operational deployments were going on, as
 16 you'll appreciate sir, this is 00.45, after midnight, in
 17 5 or 6 hours' time the night staff would be finishing,
 18 the day staff would be coming on, so there's obviously
 19 preparation for future firearms resources, tasking and
 20 things like that, which again is probably my role as
 21 well as the strategic firearms commander's, trying to
 22 put things like that in place. And discussions around
 23 what the wider picture and threat looks like, be it from
 24 national asset support. So there's probably wider work
 25 going on that the SFC has to do that I'm probably not

1 aware of.
 2 SIR JOHN SAUNDERS: I can understand that there are other
 3 things she has to do, so please don't think I'm doing
 4 that — you mentioned it and I was just struggling to
 5 find out what she was actually doing which was stopping
 6 these meetings taking place.
 7 A. Just probably the answer I've given you there, sir.
 8 I don't know after that.
 9 SIR JOHN SAUNDERS: Thank you.
 10 MR GREANEY: Thank you, sir.
 11 Let's move on in time. At 00.15 you began a call
 12 with the FDO and during that call you took command and
 13 control.
 14 A. Yes, that's correct.
 15 Q. In the period that followed, by which I mean minutes and
 16 hours, you were involved in responding to the perceived
 17 ongoing threat?
 18 A. Yes, that's correct.
 19 Q. Including the events at Oldham Hospital?
 20 A. Yes.
 21 Q. And you were involved in establishing the progress of
 22 the search of the arena?
 23 A. Yes.
 24 Q. You were involved in identifying where particular assets
 25 were deployed?

1 A. Yes.
 2 Q. And you were involved in ensuring that there would be
 3 sufficient police officers , particularly armed police
 4 officers , available to work the next day?
 5 A. Yes.
 6 Q. And you entered the CTPOR, where in fact you spent much
 7 of the following days?
 8 A. Yes, that's correct .
 9 Q. I recognise that you did much more than all that I have
 10 just mentioned, and I recognise as well that you were
 11 undoubtedly working hard and I don't want in any sense
 12 to diminish the importance of work that you were doing
 13 over that period. I hope that's clear .
 14 A. Yes.
 15 Q. But what I want to do is to focus on your learning from
 16 the events of that night and necessarily that means
 17 looking at what didn't go well or may not have gone
 18 well.
 19 So first , this : were you aware that a major incident
 20 was not called until 1 am, so 2.5 hours after the
 21 explosion, by GMP?
 22 A. I have since been made aware through this inquiry, but
 23 not at the time. I didn't know one hadn't been called.
 24 Q. Was it a mistake that GMP delayed declaring a major
 25 incident?

1 A. Yes.
 2 Q. What to your mind were the consequences of that delay?
 3 A. I think with a major incident, I think you get probably
 4 a different response from different sets of assets, it
 5 probably gives you better ground tactical command of
 6 unarmed staff and I'm aware --- and it's many years since
 7 I've read the major incident plan, it probably gives you
 8 certain assets around things like the casualty bureau
 9 and things like that.
 10 Q. It puts a structure in place?
 11 A. It does, that's correct, sir .
 12 Q. A working structure?
 13 A. A structure that probably sits separate to the Plato and
 14 the response that's going on.
 15 Q. And in your learning paper, we don't need to turn it up,
 16 one of the recommendations that was made was that the
 17 Operation Plato plan ought to provide specifically for
 18 a major incident also being declared.
 19 A. Yes, I think in one of the plans, it does mention
 20 consider --- and I can't remember which one it is --- it
 21 does mention about consider a major incident, and that's
 22 one of the FDO's, I think, prompts. I can't remember
 23 which paper that is in, whether it's in the SOP or it
 24 might be in JOPs --- actually, I think it's JOPs --- it's
 25 in about consider a major incident.

1 Q. It's quite difficult , isn't it , to think of a situation
 2 in which Plato has been declared and that situation is
 3 not also a major incident?
 4 A. That's correct. If it's a major incident at 1 am, it
 5 was certainly a major incident at 10.45.
 6 Q. Next topic, and I'll finish my questioning before the
 7 break. You've already indicated to the chairman that
 8 you were unaware that night that the Fire and Rescue
 9 Service did not arrive at the time at which they were
 10 able to provide assistance?
 11 A. I wasn't aware of that.
 12 Q. Were you aware, whether from the course that you had
 13 attended on 2 May or more generally, that they were
 14 capable of providing real assistance in circumstances
 15 such as that which occurred on the night?
 16 A. I'm aware that the Fire and Rescue Service do have
 17 a high level of first aid and medical training and
 18 obviously provision in their daily routine and also with
 19 their enhanced trained staff.
 20 Q. Were you aware that night at any stage that three
 21 paramedics and no more entered the City Room in order to
 22 provide assistance?
 23 A. I wasn't aware on the night.
 24 Q. When subsequently you did discover those facts
 25 in relation to your emergency service partners, were

1 those matters that surprised you?
 2 A. They were, yes.
 3 Q. Were you surprised that you didn't know about those
 4 matters on the night?
 5 A. I wasn't surprised, no, because I think the
 6 responsibility --- when I spoke to Mark Dexter, when
 7 I took over command and control, I was quite aware that
 8 Mark had a good situational awareness of what was going
 9 on and because of everything that was happening around,
 10 I gave command responsibility to Mark. I don't think
 11 there was anything --- when I took over I was aware that
 12 casualties had left or been cleared, so probably at that
 13 stage it wasn't anything that was in my mindset.
 14 Q. I think you're saying something very similar to what
 15 we were told by Chief Inspector Dexter: by the time he
 16 arrived and by the time he was briefing other officers
 17 at 11.40, that was his first briefing , he wasn't
 18 particularly concerned by the absence of the Fire and
 19 Rescue Service because the time for their value had
 20 gone.
 21 A. Yes, I'm aware of that.
 22 Q. And are you really expressing a very similar view given
 23 the time at which you arrived at the force control room?
 24 A. Yes.
 25 Q. Would it be fair to say, and again I don't think there's

1 anything controversial in this, that obviously something
 2 went wrong in the joint response that night?
 3 A. I would agree with that, yes.
 4 Q. Do you have a view about why it went wrong?
 5 A. Only probably from what I've heard from the inquiry,
 6 that it's all about --- the Plato plan is all about
 7 informing partners and ensuring that's communicated and
 8 then co-location, which are probably some areas I know
 9 the inquiry has covered. I think sometimes --- my
 10 personal view is that when we talk about joint
 11 decision-making and we talk about deployment of
 12 resources, that actually when you look at the joint
 13 decision model around threats and working strategy and
 14 options and action, sat in the middle of that strategy,
 15 which people forget, is "Save lives and do your job".
 16 My personal view is that sometimes policy and
 17 adherence can become more --- if you talk about policy,
 18 what you should be actually doing is thinking about what
 19 you are trying to achieve and that's probably saving
 20 people's lives, deploying staff and trying to make ---
 21 doing a good job in what are difficult circumstances.
 22 Sometimes policy and procedure can get in the way of
 23 that, but I understand that there are certain tasks that
 24 weren't undertaken on the night.
 25 Q. Obviously, everyone who was there, everyone who was

1 in the force control room, would be wanting to save
 2 lives and, in their own mind, would have been doing the
 3 best that they could. But it's important, isn't it,
 4 that people take a step back, not sit in their silo and
 5 say not only "What can I do" but "How can I be helped in
 6 doing that by our partners"?
 7 A. Yes, and I even reflected on it myself, could I have
 8 engaged more with partners, was there anything I could
 9 have considered around perhaps the Fire Service and the
 10 Ambulance Service, which on reflection I don't think
 11 I asked maybe the right questions, but by the time
 12 I took command and control it was about 00.15 and I was
 13 happy the casualties had been cleared, but not what
 14 emergency services and what was actually on the ground
 15 which is probably some reflection for myself, perhaps
 16 I should ask more probing questions about what was going
 17 on there.
 18 SIR JOHN SAUNDERS: Just on that topic, we heard from
 19 ACC Ford that she didn't regard it as her job to be
 20 checking up on what had happened before, these(?)
 21 forward planning, and that's what you were doing in the
 22 Silver control room. Bearing in mind that in these sort
 23 of crises, with people dealing with situations that
 24 they've never dealt with before in practice, things do
 25 go wrong, people do forget to do things which they ought

1 to do, would it not be a good idea, once the Silver
 2 control room is set up, that someone actually does do
 3 a check and says, "Have these things been done"?
 4 A. Sir, you're absolutely right I think it would be a good
 5 idea and I think --- but just to reiterate what ACC Ford
 6 said there is that --- I think when I came to look at my
 7 firearms operation, I've reflected on this myself, I'm
 8 looking at putting an operation in to deal with threats
 9 that are going to be coming in as opposed to the threats
 10 of 80 minutes ago or 90 minutes ago. But you're
 11 absolutely right, I think there would be a good piece of
 12 learning or something like that that would then go
 13 through this checklist to check that people had actually
 14 undertaken some of what are probably the basic aspects
 15 following the declaration of an Operation Plato.
 16 MR GREANEY: There is, of course, not specific to an MTFA
 17 Plato incident, a checklist within the major incident
 18 plan as we saw.
 19 What I want to consider in a moment is whether what
 20 went wrong with the joint response that night is or may
 21 be symptomatic of a problem with Operation Plato, at
 22 least as it existed back then. But before we get to
 23 that, I just want to be clear that when you spoke to
 24 Chief Inspector Dexter at just gone midnight, what you
 25 didn't speak to him about was Plato?

1 A. Yes.
 2 Q. And what you didn't speak to him about was zoning?
 3 A. Yes.
 4 Q. Did you recognise that night that Plato and the
 5 declaration of Plato was something that ought to be
 6 reviewed?
 7 A. Yes, again I've reflected on this --- is that at that
 8 particular period, when I came into the control room,
 9 I was aware that casualties were being removed or had
 10 been removed, so I was happy that there was no hot zone
 11 as such, as would be defined in Plato, and that zoning
 12 was responsibility of the ground-assigned TFC. But
 13 in relation actually to a review of Plato, I think it
 14 was probably something that I was doing myself but not
 15 a physical actually write-it-down because for me what
 16 the Plato gives me, as a police commander, is specialist
 17 assets and why would I want to not have specialist
 18 assets supporting me, bearing in mind something may
 19 happen.
 20 Secondly, I know in the Plato it does mention things
 21 like the firearms commanders reviewing it. I've
 22 reflected on that. I think that as a firearms commander
 23 I would not feel comfortable with rescinding a Plato.
 24 I would go to the strategic firearms commander, and
 25 I think after an incident that happened on 22 May, that

1 decision would have to be taken in consultation probably
 2 with the counter-terrorism command in London because
 3 I would not know or be in a position to know what other
 4 intelligence , threats or otherwise the criticality of
 5 any decisions I may make, but I always read into the
 6 Plato plan around the TFC being able to rescind it with
 7 the SFC. In my mind, that was something like: we
 8 declare a Plato, we go to an area in Manchester where
 9 there's been a lot of shots fired , and it's two gangs,
 10 two crime gangs, shooting each other, clearly that's not
 11 terrorism, it wasn't a Plato, we can rescind that quite
 12 quickly. But in an operation like this , where there's
 13 clearly been a terrorist attack, a mass casualty attack,
 14 the threat level went up to critical , didn't it, the
 15 following day?
 16 Q. Yes.
 17 A. I worked in the CTPOR where we arrested people involved
 18 in the conspiracy. It was a sophisticated attack and
 19 I would not feel comfortable and at no stage did it
 20 enter my mind that I should be rescinding or even
 21 contemplating it in my role as the TFC.
 22 SIR JOHN SAUNDERS: This is very much what Mr Dexter said
 23 and I think the conclusion of his evidence really was to
 24 say you can understand why you keep Plato going because
 25 once you rescind it then you lose all your armed assets

61

1 maybe.
 2 A. Yes, I'd agree with that, yes.
 3 SIR JOHN SAUNDERS: But what you have to keep reviewing is
 4 the zoning and where it is safe for people to go.
 5 A. I agree with that and I've even thought could you have
 6 a Plato with just cold zones, and potentially you could.
 7 SIR JOHN SAUNDERS: Well, you would have had --
 8 A. Yes.
 9 SIR JOHN SAUNDERS: -- if someone had said, as they did
 10 eventually, the arena was a cold zone, then actually
 11 you've got a Plato existing with no hot zones.
 12 A. Yes.
 13 SIR JOHN SAUNDERS: Is that right?
 14 A. Yes, yes, that's correct.
 15 SIR JOHN SAUNDERS: While we're talking about that, the
 16 report from Oldham Hospital, which was of a firearm
 17 being --
 18 A. Yes, gunshots.
 19 MR GREANEY: And a siege.
 20 SIR JOHN SAUNDERS: All of which was not correct?
 21 A. That's correct, sir, yes. I think just to -- I'm glad
 22 you asked that question because I remember when that
 23 came in. If I said the word concerned, that would
 24 probably sum up in a nice way of what had happened.
 25 I think my initial thoughts on that was there's

62

1 potentially a transfer of malice, this is a secondary
 2 attack. So I --
 3 SIR JOHN SAUNDERS: It's interesting you use that, it is
 4 a good lawyer's phrase, transfer of malice, which few
 5 people understand, I think.
 6 A. Thank you. And I think that -- however, I deployed the
 7 resources, briefed the officers , I know the officers who
 8 went to basically engage any threat they found there.
 9 What I -- I suppose the good thing about myself and
 10 having experienced firearms commanders is what I was
 11 very cautious of is that this could be a false call with
 12 good intent, it could be secondary call to lure us, it
 13 could be a secondary call because the offender was still
 14 in Manchester and trying to remove those assets so they
 15 could make good their escape.
 16 What you don't see behind the scenes there --
 17 I considered things like an RVP and FCP probably at
 18 Tesco in Oldham should we then get a confirmation
 19 there's a Plato and then there would have been an
 20 ongoing deployment.
 21 You are right, but I suppose being detached from the
 22 conversation I've had with Mark, who's obviously seen
 23 what's going and thinking probably with a different
 24 perspective and a more -- not emotional perspective but
 25 I was able probably to resolve the issue, probably, from

63

1 the control room better than Mark was.
 2 SIR JOHN SAUNDERS: Okay, thank you.
 3 MR GREANEY: I think there's no doubt there was an effective
 4 response to the Oldham events in which you played
 5 a major part.
 6 Just to go back to the answer that you gave when
 7 I asked you about whether you recognised the need for
 8 Plato to be reviewed, I just want to make sure that
 9 I understand.
 10 First of all , you said was Plato gave you, as the
 11 tactical firearms commander, were specialist assets and
 12 you'll be able to answer this question yes or no. You
 13 can confirm that the specialist assets that Plato gave
 14 you were, without being any more specific, military
 15 assets?
 16 A. Yes.
 17 Q. And as you put it, I think, why would you give up such
 18 assets in a situation like that?
 19 A. Yes, that's correct .
 20 Q. Secondary, your understanding from speaking to
 21 Mark Dexter was that you didn't have any hot zones by
 22 the time you were engaged in commanding the situation?
 23 A. That's correct. I quickly knew there was no hot zones
 24 when I walked into the control room, yes.
 25 Q. And I think it's at 00.47 that in fact you're told that

64

1 certain areas are a cold zone.
 2 Thirdly, have I correctly understood that you
 3 thought that before Plato could be rescinded, there
 4 would need to be a conversation to be had with
 5 counter-terrorism officers at a national level?
 6 A. No, sorry, just to clarify, I think in the actual JOPs
 7 it says that the TFC and the SFC can do that. But
 8 personally, I think that following a terrorist incident
 9 like this, I probably wouldn't think it would be prudent
 10 to do that without talking to perhaps assets in London
 11 who would give us a better intelligence picture than
 12 I could give, just sat in Manchester an hour and a half
 13 after an attack.
 14 Q. I don't want to encourage you to say anything
 15 operationally sensitive, but are you talking about
 16 a conversation probably with the senior national
 17 coordinator, Mr Basu?
 18 A. Yes, that'd be correct.
 19 Q. Because he would have an overview of what was happening
 20 not just in Manchester but what might be happening
 21 elsewhere in the country?
 22 A. That's correct, yes.
 23 Q. Then I have understood your answer.
 24 I began this sequence of questions by telling you
 25 that we would look at whether the events of that night,

65

1 the failure of joint working, revealed a problem with
 2 Operation Plato, and I want to draw your attention to
 3 some views that were expressed in the learning paper.
 4 We'll have this back on the screen, please.
 5 {INQ029095/5}, the bottom half of the page.
 6 We see a further view here expressed by Mr Dexter,
 7 and there's no doubt he made a significant contribution
 8 to this piece of learning. There's a paragraph that
 9 starts:
 10 "Mr Dexter raised..."
 11 Do you see that?
 12 A. Yes.
 13 Q. "Mr Dexter raised concerns regarding the definition of
 14 Operation Plato and the way in which it has been
 15 interpreted by different agencies."
 16 He told us about that last week:
 17 "He feels that the current guidelines around the
 18 declaration of Operation Plato and the procedures that
 19 it sets in place are very much geared towards
 20 a marauding terrorist firearms attack."
 21 Then this:
 22 "There is no mid tier within that guidance that
 23 really covers the type of event that was faced on the
 24 night of this attack, where the military see it as
 25 a notification for military aid and deal with the

66

1 incident as they see it."
 2 There's then reference to guidance. Before I ask
 3 you questions about that, can we go forward, please, to
 4 {INQ029095/13}.
 5 SIR JOHN SAUNDERS: I am not sure I fully understand that.
 6 MR GREANEY: That is what I am going to ask about, sir.
 7 At page 13 point 9 -- in fact we see at point 7
 8 something I was asking you about earlier -- these are
 9 recommendations inserted into the Plato response, the
 10 requirement for a designated major incident. Then 9:
 11 "It is recommended that the guidelines that surround
 12 Operation Plato should be re-examined in order to give
 13 greater flexibility in response to the nature of the
 14 incident that services are responding to. They are at
 15 present heavily geared towards an MTFFA response and this
 16 can hinder the emergency response to the incident when
 17 it does not fall directly within that criteria. At the
 18 very least there should be some consideration given to
 19 clarifying the language used in the Operation Plato
 20 guidelines to give some definition between the MTFFA
 21 responses and those for other incidents."
 22 Do you see that?
 23 A. Yes.
 24 Q. What did you understand the concern that was being
 25 raised to amount to?

67

1 A. I think it's around things like zoning, where you look
 2 at things like where you've got a -- on the night, when
 3 I had discussions with Mark Dexter around a warm zone,
 4 well, there'd clearly been no firearms attack, but there
 5 was potentially still a threat in the warm zone
 6 in relation to things like IEDs, secondary devices, a
 7 thorough search of locations --
 8 Q. Yes.
 9 A. -- but that shouldn't preclude unarmed officers or
 10 non-specialist staff operating in there. But clearly if
 11 you have a look at JOPs, it would have to be -- to
 12 operate in there your high level, your HART teams and
 13 things like that. So there should be a way of perhaps
 14 being able to communicate where there is an area of
 15 concern, where the threat may be other than a firearm,
 16 rather than using the zoning system, which I think was
 17 mainly designed with thoughts of firearms and
 18 potentially people running into areas with firearms and
 19 those being potential to, obviously, harm the responding
 20 services. So it's a way of communicating a different
 21 threat and different risk, notwithstanding that there
 22 may still be threats as opposed to firearms.
 23 Q. So as Mr Horwell and Mr Butt have drawn our attention to
 24 on a number of occasions, quite rightly, within the
 25 Plato policy, of course, there is a degree of discretion

68

1 given to those with responsibility for it. But the
 2 expectation is that so far as the warm zone is
 3 concerned, those who go in will be specialist assets of
 4 the emergency services?
 5 A. That's correct, yes.
 6 Q. Is the concern that was being expressed that there are
 7 warm zones and there are warm zones?
 8 A. Yes, that sums it up, yes.
 9 Q. And that there was a need to ensure that people
 10 understood that there was a degree of discretion
 11 in relation to who could or should go into a warm zone
 12 if it was, to use Mr Dexter's phrase, warm going cold?
 13 A. Yes, I agree with that.
 14 MR GREANEY: Sir, I've finished asking my questions about
 15 Operation Plato. I have nearly finished completely.
 16 I just want to pause to see if you had questions.
 17 I'm just going to read this note from Mr Suter.
 18 (Pause)
 19 This takes us back, sir, to the question that you
 20 asked about the tri-service MTFA training that the
 21 witness undertook on 2 May. I'm just going to read out
 22 Mr Suter's note to me, if he's happy that I should do
 23 so:
 24 "In Inspector Lear's second statement,
 25 {INQ040412/1}, dated 18 February 2021, Inspector Lear

69

1 says:
 2 "'We also offered a number of further training
 3 sessions in April 2017 for GMP, NWS and GMFRS. These
 4 training sessions were designed to simulate an MTFA
 5 scenario and to provide an opportunity for TFCs, NILOs
 6 and HART to come together. This was additional training
 7 instigated by my team. They were seen by me as
 8 a success and I believe by others who attended.'
 9 I think you'd probably agree with that final remark
 10 by Inspector Lear?
 11 A. Yes, I do.
 12 SIR JOHN SAUNDERS: I just want to go back to the
 13 flexibility which you were talking about with
 14 Mr Greaney. I quite understand there are warm zones and
 15 then there are warm zones and every incident has to be
 16 looked at on its own factual basis. The person who
 17 first of all will say who it is safe for people to
 18 work -- where it is safe for people to work would be the
 19 firearms commander because initially they're the people
 20 who go in?
 21 A. Yes, it should be. If it's all working correctly,
 22 you've obviously got the NILOs from the agencies
 23 together with the ground-assigned or the on-scene
 24 commander, that decision there (sic).
 25 SIR JOHN SAUNDERS: So it may be before the ground-assigned

70

1 comes there. So the senior firearms commander on the
 2 scene, who's in charge, will make his assessment of
 3 whether it is safe for people to go and work in there?
 4 A. Yes, but that should be done -- in relation to JOPs,
 5 that should be done with the other services.
 6 SIR JOHN SAUNDERS: I understand that but he has to make his
 7 own assessment first and he has got to make up his own
 8 mind?
 9 A. Yes.
 10 SIR JOHN SAUNDERS: And he goes back to the others and then
 11 says, "Right, I think it's safe for you to go and work
 12 in there, either with or without ballistic equipment"?
 13 A. Yes.
 14 SIR JOHN SAUNDERS: And then that has to be agreed by the
 15 commander for the individual service, so the NWS
 16 commander will then be able to ask further questions and
 17 come to his own conclusion?
 18 A. Yes.
 19 SIR JOHN SAUNDERS: The Fire Service will come to their own
 20 conclusion?
 21 A. Yes.
 22 SIR JOHN SAUNDERS: And they may all disagree?
 23 A. That's correct, that could happen now, I would assume.
 24 SIR JOHN SAUNDERS: And that's how it will happen. You'll
 25 have a discussion, you'll share what information there

71

1 is, and then some people are more cautious than
 2 others --
 3 A. Yes.
 4 SIR JOHN SAUNDERS: -- and they'll just make their own minds
 5 up. So the Fire Service might go in, but NWS don't go
 6 in. Armed police might go in, but the Fire Service
 7 don't go in. Whatever.
 8 A. You're right, sir, I don't think I've ever read
 9 a policy, unless I am going to be told by someone else,
 10 that says ultimately who has responsibility for the
 11 final decision-making, whether that's done by
 12 a particular agency or vote. I have never read that
 13 it would be, as you've said there, a decision by the
 14 commander on the ground in charge of those resources.
 15 SIR JOHN SAUNDERS: If they don't come to the same decision,
 16 which hopefully they would do, joint working is quite
 17 tricky?
 18 A. I would guess that that's probably the summation, yes,
 19 sir.
 20 MR GREANEY: Thank you, sir.
 21 I'm just going to finish my questions by asking you
 22 about two further issues, both relating to training
 23 needs that were identified by the learning paper.
 24 First, do you recall that the work that was done to
 25 put together the learning paper revealed a concern about

72

1 first aid training on the part of those officers who
 2 entered the City Room, so Kam Hare and his colleagues?
 3 A. Yes, and that was probably one of the main drivers of
 4 that document.
 5 Q. We'll just look at how it's expressed in the learning
 6 paper.
 7 {INQ029095/7}. The top half the page, second
 8 paragraph:
 9 "This left other unarmed GMP assets to deal with the
 10 casualties present at the scene, many of whom had
 11 suffered life-changing injuries. Many of those officers
 12 have since stated that they did not feel the level of
 13 training that they have been given in relation to
 14 first aid training was sufficient for the task, and they
 15 felt helpless in the face of the injuries that they were
 16 confronted with."
 17 And if we move forward to {INQ029095/11}, please:
 18 "As previously mentioned, TAU officers..."
 19 So the Tactical Aid Unit officers?
 20 A. That's correct.
 21 Q. You responsible for that unit at the time?
 22 A. Yes.
 23 Q. And, as we know, Sergeant Kam Hare was a member of such
 24 a team:
 25 "As previously mentioned, TAU officers from SOT have

73

1 stated they were left with casualties with some horrific
 2 injuries and they were not appropriately trained for
 3 what they faced. As earlier mentioned, if it hadn't
 4 been for the treatment casualties received at the scene
 5 it could have been so different. However, an area that
 6 was highlighted by NWAS is the need to refresh staff in
 7 the application of tourniquets."
 8 So the work that was done on your instruction
 9 afterwards identified that front line officers needed to
 10 be better trained in first aid?
 11 A. Yes.
 12 Q. And that a particular thing that they needed to
 13 understand was the application of a tourniquet?
 14 A. Yes.
 15 Q. By the time you left Greater Manchester Police, had such
 16 training been given to front line officers?
 17 A. Not to my knowledge at the time, although I was
 18 a commander at the airport towards the end so I am not
 19 aware what training was given to the officers, but not
 20 to my knowledge.
 21 Q. We'll take that question up with the chief officers when
 22 they give evidence.
 23 SIR JOHN SAUNDERS: Just as a matter of interest, has that
 24 finding, that training influenced any decisions that you
 25 made in your new job?

74

1 A. Yes, actually, yes.
 2 SIR JOHN SAUNDERS: Thank you.
 3 A. There's a package which, in my new job, that we have
 4 trained a lot of our staff on, something called
 5 citizenAID, which I think has been part of this, and we
 6 took it up about 12 months ago.
 7 SIR JOHN SAUNDERS: Thank you very much.
 8 MR GREANEY: This is Brigadier Hodgetts' project. I think
 9 what you're saying is that Manchester United hadn't been
 10 alerted to the need to do this by the inquiry's
 11 evidence, even before that you were adherents of
 12 citizenAID?
 13 A. That's right, we commenced that training about 14 months
 14 ago with our stewards and staff there. I think we've
 15 trained initially up to 70 staff and there's an ongoing
 16 programme that's obviously been delayed slightly because
 17 of what's happened with the recent COVID pandemic.
 18 SIR JOHN SAUNDERS: Thank you.
 19 MR GREANEY: The final training issue — and this takes us
 20 back to some evidence that Mr Dexter gave about his
 21 understanding of how his radio operated. Your work
 22 revealed a need for officers to have a better
 23 understanding of their radios and procedures?
 24 A. Yes.
 25 MR GREANEY: Mr Thompson, thank you very much indeed.

75

1 SIR JOHN SAUNDERS: And even your radio had a flat battery.
 2 A. Yes. That's from taking it home and having it in the
 3 vehicle, yes, you're right, sir.
 4 MR GREANEY: Sir, those are my questions of Mr Thompson.
 5 SIR JOHN SAUNDERS: Thank you. We'll have a quarter of
 6 an hour break.
 7 Is that long enough for you?
 8 A. That's fine, sir.
 9 SIR JOHN SAUNDERS: Thank you.
 10 (11.22 am)
 11 (A short break)
 12 (11.40 am)
 13 MR GREANEY: Sir, Mr Atkinson will now ask his questions.
 14 Questions from MR ATKINSON
 15 MR ATKINSON: I ask questions on behalf of the bereaved
 16 families and you've covered much of the ground with
 17 Mr Greaney already, so just a few further questions
 18 about a number of the topics that you covered.
 19 Firstly, in relation to training. The course that
 20 you observed, is this right, on 2 May, this was
 21 a programme of a series of events aimed at, so far as
 22 the police were concerned, firearms commanders or
 23 firearms officers?
 24 A. It was mainly for firearms officers to practice skills
 25 of working actually on the ground at an operational

76

1 level with the other emergency services, but commanders
 2 could observe the training. There was certainly no
 3 command training taking place, it was more for
 4 commanders like myself to be aware of the tactics that
 5 were taking place and what it looked like operationally
 6 on the ground.
 7 Q. Were those officers doing this training with their
 8 counterparts from the other emergency services or just
 9 having an explanation from a NILO about how that would
 10 work?
 11 A. No, certainly with other colleagues from the Fire and
 12 Rescue Service and from the North West Ambulance
 13 Service.
 14 Q. And was that particularly aimed at their specialist
 15 responders, HART and SRT and people like that?
 16 A. That's correct, yes.
 17 Q. If you can remember, how much discussion was there at
 18 that as to how that joint working between them would be
 19 initiated in a Plato context?
 20 A. I can't recollect anything around the joint working, it
 21 was more about what the roles are, what their sort of
 22 responsibilities were, and how they sort of managed
 23 their teams as opposed to actually joint working, joint
 24 decision-making process and how that actually takes
 25 place. I'm not saying that wasn't on, but my

1 recollection is it was more about individual agencies
 2 talking about what their roles were.
 3 Q. Was there any use of tri-service radio communication
 4 during that training?
 5 A. I wouldn't be able to recollect that, sir.
 6 Q. The establishment of an FCP, a forward command post?
 7 A. Again, I can't actually recollect the actual content of
 8 the briefings, apologies.
 9 Q. And zoning, was that a topic that was discussed as you
 10 remember?
 11 A. Yes, it was discussed and it will have been an integral
 12 part because of who was allowed to work in which zones
 13 and this was mainly related to working and providing
 14 assistance in the warm zone.
 15 SIR JOHN SAUNDERS: Do you mind if I interrupt that and
 16 clarify something?
 17 MR ATKINSON: No, not at all.
 18 SIR JOHN SAUNDERS: You've told us your views on zoning and
 19 the flexibility which you think is needed, and we were
 20 talking about different degree of warmth.
 21 A. Yes.
 22 SIR JOHN SAUNDERS: Did you or anyone express that at the
 23 time rather than the rather rigid, perhaps, setting out
 24 of it in Plato?
 25 A. No, sir, because probably I'd always related Plato to

1 the marauding terrorist firearms attack, I'd never just
 2 considered it in the context of just an IED attack and
 3 then how -- I'd never, even probably on that night and
 4 reflecting on it -- of who ultimately has responsibility
 5 for saying an area is clear of IEDs and how we'd have
 6 gone about that process. That was not something before
 7 that night I had even considered around what may be the
 8 consequence.
 9 SIR JOHN SAUNDERS: But an IED with a follow-up of a gunman,
 10 is that not something you had considered?
 11 A. Yes, and probably the zones to a degree there, because
 12 there's the MTFA and there's that actual threat of
 13 a firearm, probably the warm zone probably does work.
 14 It's when you have that big delayed period when you want
 15 to get in and you don't think there's that firearms
 16 threat at the time. I think that actually, if you were
 17 to ask me a general question about zoning -- this is my
 18 personal view, sir, would be I think the hot zone is
 19 very good and we need to totally have a hot zone, but
 20 there are elements of the warm and the cold -- as long
 21 as people know what the actual threat is, do they become
 22 more or less relevant, and I know that if everyone had
 23 a level of protection, with the ultimate aim of saving
 24 lives, that would be my view, but there's probably a lot
 25 more sides to it and there would need to be a lot more

1 work done on it.
 2 I think, certainly once the hot zone goes, this warm
 3 going to cold becomes very difficult because people's
 4 interpretation, as you've quite rightly said, sir, can
 5 be different of, why is it warm, and, does it mean
 6 I have to wear protective equipment, when actually
 7 I just need to get in there and try and save some lives.
 8 SIR JOHN SAUNDERS: Actually, again, if I may say, one of
 9 the most important things about that warmth is: there
 10 have been terrorists here and they may come back.
 11 A. Yes.
 12 SIR JOHN SAUNDERS: Actually, if you have a ring of firearms
 13 officers around it, you may call it a warm zone but
 14 they're going to have difficulty getting in and that
 15 affects it hugely.
 16 A. Absolutely. If they've got in a car and driven off,
 17 they could drive back or (inaudible) make it a cold
 18 zone, so actually is it just a hot zone? I don't know.
 19 I think that's perhaps just a personal opinion
 20 because -- perhaps just from my knowledge on the night.
 21 SIR JOHN SAUNDERS: It's obviously helpful, so thank you.
 22 MR ATKINSON: Did you have a sense from your own training
 23 and experience in relation to Plato and how that would
 24 work that there had to be a hot zone?
 25 A. No, I don't think there had to be any zones -- and there

1 are circumstances now -- you could get circumstances
 2 where there wouldn't be a hot zone. I presume my
 3 assumption would be is that if it was a Plato marauding
 4 terrorist firearms attack there was likely to be one,
 5 but actually if you read the actual guidance and
 6 actually read the guidance there may not be a hot one,
 7 there may be a report and then someone leaves the area,
 8 so there's no hot zone.
 9 Q. If hot is taken, as JOPs made clear, as somewhere where
 10 there's actually an active assailant there or immediate
 11 risk, again there can be many situations where there's
 12 unquestionably a risk because of what has happened that
 13 there may be a firearms element developing, but at
 14 a particular time there is no one with a gun, so there
 15 is no hot zone?
 16 A. You're absolutely right and one thing I learned on the
 17 specialist tactical firearms commander's course was
 18 where I'd gone into it as a firearms commander, saying
 19 the risk is medium, the risk is high, the risk is low,
 20 on the specialist course it's about actually defining
 21 and communicating in clear language to the officers on
 22 the ground: actually, you may say the risk is medium, or
 23 whatever you're going to say, but what is actually
 24 defining that risk? And then there being more of
 25 a narrative and more of a speech and more clear

1 communication and more better use of language so the
 2 officers actually understand what it is rather than
 3 myself going, "The threat's medium, the threat to this
 4 officer is low", because it doesn't really -- it is very
 5 subjective, low, medium, hot, warm, unless something
 6 actually sits behind that that actually explains to
 7 people why is it warm and what's the threat.
 8 SIR JOHN SAUNDERS: I need to -- we're going back slightly
 9 on something on which we've had quite a lot of evidence
 10 on before.
 11 A PBIED goes off and there's a huge explosion, like
 12 at the arena. Because of experiences in France and
 13 elsewhere, there is automatically a consideration of the
 14 risks that what's going to happen is when rescue
 15 services come in they will find themselves with another
 16 person ready to blow themselves up or with a gun going
 17 off.
 18 A. Yes.
 19 SIR JOHN SAUNDERS: So the evidence of other witnesses has
 20 been: while that risk is there, until we've got the
 21 armed officers in there to make sure it's clear, that's
 22 a hot zone because the bomb's gone off there, we just
 23 don't know what you are going to find in there we don't
 24 want people going in there, and so you stop them going
 25 in there until you have actually cleared it. Is that --

1 you disagree with that, do you?
 2 A. No, I don't disagree at all, sir, and it could be open
 3 to interpretation. The hot zone is actually --
 4 SIR JOHN SAUNDERS: That's what worries me, the open to
 5 interpretation bit.
 6 A. (Inaudible) the definition of the hot zone is the only
 7 way you can contact or direct the sort of conflict with
 8 the subjects who are there. Now, if the subject's
 9 deceased, is it a hot zone? There's clearly --
 10 I totally agree that if you define a Plato you can send
 11 officers and you could quickly redefine the Plato.
 12 I understand the methodology of both.
 13 SIR JOHN SAUNDERS: Redefine the zone?
 14 A. The zone, sorry, as opposed to the actual Plato itself,
 15 apologies, redefine the zones quite quickly into, yes,
 16 we have been there, we have assessed -- we don't need
 17 zones to do that -- I am deploying -- sorry, I was
 18 deploying firearms officers every day, not to bombs, but
 19 to threats of people being shot and people being shot at
 20 without zoning. That's not a daily business as usual
 21 firearms operation in Greater Manchester and the FDO is
 22 deploying firearms officers on a daily basis to gunshots
 23 and there's no zoning. I appreciate that zoning is
 24 mainly to do with marauding terrorists and higher-end
 25 capabilities. So again, and apologies for saying this,

1 the zones are subjective based on what you feel the risk
 2 and threat is at the time.
 3 So you're right, an IED is a precursor to a perhaps
 4 Paris-style or Mumbai attack or it may be a standard --
 5 it may just be a bomb that's gone off and there's no
 6 secondary threat.
 7 SIR JOHN SAUNDERS: Okay, so if I'm an FDO who's acutely
 8 aware of Mumbai and Paris, then I say, "Oops, there's
 9 a real risk of something there, so I declare it a hot
 10 zone"?
 11 A. Yes.
 12 SIR JOHN SAUNDERS: If I'm an FDO who happens to be rather
 13 less well up on those terrorist attacks, I say --
 14 I don't declare it a hot zone?
 15 A. Yes.
 16 SIR JOHN SAUNDERS: Thank you.
 17 MR ATKINSON: Isn't the -- sorry this is becoming a
 18 (overspeaking) I probably should.
 19 Isn't the risk though that the zones are important
 20 to the multi-agency nature of the response? Because, as
 21 you rightly say in your witness statement, when you
 22 heard this was Plato, you expected this was going to be
 23 a multi-agency response with the procedures that went
 24 with that?
 25 A. Yes.

1 Q. And what the zones, would you agree, are designed to
 2 help with is for the other emergency services to know
 3 where they can go or not?
 4 A. Yes, I agree with that. But I think there's -- I think,
 5 yes, you're absolutely correct but that zoning has got
 6 to take place between all the agencies and all the
 7 agencies must understand the joint risk and why they are
 8 calling them those particular zones. So yes, the
 9 initial response through the force duty officer to call
 10 something a hot zone, that is quite rightly the decision
 11 to make. But as and when that -- the three services can
 12 get together, then the zoning then just becomes
 13 important but it must be a joint decision, a joint
 14 understanding of why they are those zones.
 15 Q. Following up on that, the JOPs itself, {INQ008372/15},
 16 4.12. Just to put this in context, Mr Thompson, and in
 17 fairness, the JOPs makes clear that you don't always do
 18 the things in the order they are listed in the JOPs
 19 because you obviously have to adapt to the situation.
 20 But by point 12 in the JOPs plan:
 21 "The other emergency services will have been
 22 informed that Plato has been declared. Three-way
 23 communication will have been set up between them."
 24 A. Yes.
 25 Q. "An RVP will have been agreed between them and an FCP

1 will have been set up. Joint risk assessment will have
 2 been undertaken."
 3 And then at 4.12:
 4 "The boundaries of hot, warm and cold zones must be
 5 frequently reviewed."
 6 And it is clear from that that that review is
 7 a multi-agency review rather than one element of it.
 8 A. Yes, and I would agree with that because, putting the
 9 police to one side, if the Fire Service decided that
 10 a zone was warm and the police didn't, then obviously it
 11 needs to be that joint decision. But I agree that the
 12 zoning -- I think the initial action of the FDO
 13 certainly should be to certainly designate a hot zone,
 14 if there is a hot zone, to ensure that emergency
 15 services don't go in and become very ineffective very
 16 quickly by going into an area where perhaps they could
 17 be confronted by a subject.
 18 Q. So is the reality that in the very early stages, the
 19 other services will look to the police command for that
 20 first assessment of where is hot, and if the police have
 21 got their firearms officers in, have made the location
 22 as safe as it can be, that can be then communicated to
 23 the other services and the zoning follows from that?
 24 A. I would say that's probably the logical process, yes.
 25 It doesn't stop other services -- I mean, if you let me

1 talk from a police point of view, but for example it
 2 doesn't stop -- part of the FDO Stay Safe briefing
 3 doesn't stop unarmed officers if they are in position or
 4 in a safe location to observe what's going on or even,
 5 I would say, assist someone if it was safe to do so, but
 6 obviously just the fact that a zone is called hot,
 7 I wouldn't expect any officer not to do their duty or
 8 save someone's life, but I wouldn't expect an officer to
 9 just go blindly into a hot zone, so there is probably an
 10 assessment to make but, yes, you're absolutely right
 11 regarding zone, hot zones.
 12 Q. Thank you.
 13 Just picking up on something you said earlier
 14 in relation to the role of the firearms officers outside
 15 of a Plato. It is, of course, right, isn't it, that
 16 firearms officers can be deployed to any incident where
 17 they are needed?
 18 A. Yes.
 19 Q. You don't have to declare Plato to get firearms officers
 20 to a location?
 21 A. That's absolutely right. Firearms officers go to
 22 firearms incidents and non-firearms incidents on a daily
 23 basis.
 24 Q. And without obviously going into details of who they
 25 are, it is certain specialist additional units that can

1 be deployed in a Plato and kept there while a Plato is
 2 ongoing that you have in your mind when you say there's
 3 a need, once a Plato has started, to keep it alive?
 4 A. Yes, those are non-police resources. They are
 5 non-police resources, they're military resources.
 6 Q. Again, without going into any detail at all, for obvious
 7 reasons, but can those be deployed without a declaration
 8 of Plato?
 9 A. They can be. My knowledge would be it'd be very slow
 10 time, it's what they call the MACA process, military aid
 11 to civil authorities. Those are generally for very
 12 slow-time deployments and can include anything -- in my
 13 knowledge, for things like if a river burst and you want
 14 a certain resource to help, as we've seen the military
 15 help with things like that in the past, but that's
 16 generally a very slow-time process as opposed to some of
 17 the assets that may be needed quickly.
 18 Q. So you get them more quickly if it's a Plato?
 19 A. Yes. There is a -- lot quicker.
 20 Q. But would you agree if that's the only reason to be
 21 declaring a Plato then it may be one ought to be looking
 22 at how you get those resources deployed more quickly
 23 rather than having Platos when otherwise you wouldn't
 24 need them?
 25 A. That's absolutely correct, yes.

1 Q. In terms of communication, which we just touched on, in
 2 your very helpful debrief paper one of the matters that
 3 was noted -- and if it helps you to look at it you must
 4 say so -- was, I think, that the FDO had observed that
 5 the tri-service Talk Group channel had not been -- was
 6 not something that was regularly used or tested.

7 A. That's correct. Can I just put a caveat on the actual
 8 documents? Obviously, I think I made you aware before
 9 it was a document that was done very quickly to capture
 10 some learning. It was the officers that actually spoke
 11 to the FDO so I wouldn't be able to say which FDO and
 12 I wouldn't be able to 100% -- I didn't go and verify the
 13 facts. You're absolutely right it's in the document,
 14 but that's probably as far as I would say, sir, that yes
 15 it is recorded in there.

16 Q. Two other things were said about communications. One
 17 was that the volume of radio traffic was very
 18 substantial and, as a result, in many respects,
 19 unhelpful in terms of people being able to distil what
 20 they needed to be hearing from what they didn't.

21 A. That's absolutely correct and my knowledge of radio
 22 channels in major incidents is that what happens -- and
 23 I know you're speaking to a colleague of mine later so
 24 I don't want to take their work -- as officers move from
 25 different forces' central areas, there can be issues

1 with masts and things like that and dragging of Talk
 2 Groups, I'm led to believe. So yes, but on the night
 3 communications were very difficult not just because of
 4 the number of the channels but the number of officers
 5 from different forces on different channels.

6 Q. One aspect of that that your debrief identified as
 7 working well was the national firearms channel which
 8 meant that those who were dealing with the firearms were
 9 on the same channel --

10 A. Correct.

11 Q. So clearly having specification channels for specific
 12 purposes and specific people does help?

13 A. Yes, that's correct and it's good that different forces
 14 can all access the one channel because some channels are
 15 not accessible to other forces, they are purely owned by
 16 GMP, as I understand it. So Cheshire Police or
 17 Merseyside couldn't access that channel but the channel
 18 that we put in place in GMP or my colleagues put in
 19 place meant that could be accessed by other forces.

20 Q. So by analogy, a joint channel that allowed those in
 21 command responsibility for the different agencies to be
 22 able to talk to each other would have had similar
 23 benefits?

24 A. I think that would be a very good, like what I would
 25 call a command channel, which we use in public order and

1 other operations, where perhaps just the NILOs are on it
 2 or someone like that, a level -- I think that would be
 3 very useful, yes.

4 Q. Because obviously the hope would be, and indeed the JOPs
 5 would tell them, that they should as soon as they can be
 6 in the same place as each other so they can speak face
 7 to face.

8 A. Yes.

9 Q. But there will inevitably be a period before that when
 10 they are not because they don't all start out waiting
 11 for it to happen. In that period, radio communication
 12 that was clear between them and not having to deal with
 13 everybody else as well would have helped, wouldn't it?

14 A. I totally agree. All of the operations I've ever done
 15 where they've failed or where they've become difficult
 16 is when joint communication doesn't take place.

17 That is the key: communication, obviously
 18 co-location -- well, certainly the early communication,
 19 if that's by radio, that's live time, it doesn't involve
 20 making several phone calls and obviously the phone
 21 systems can get overloaded very quickly.

22 Q. Finally in terms of communication, in terms of
 23 face-to-face communication, clearly on your arrival in
 24 the Silver command, there was an awful lot going on to
 25 put it mildly and difficult therefore to pin people down

1 to get the kind of information from them that ideally
 2 you'd have wanted from the Gold commander down.

3 A. Yes.

4 Q. So to understand how that could be improved, if the
 5 Gold commander's strategy had already been in
 6 a computerised location where you would immediately know
 7 to look for it, would that help?

8 A. Yes, it certainly would.

9 Q. Because then her strategy would already be there so you
 10 wouldn't have to write your own, with the time that
 11 took, you'd be working out how you would apply that and
 12 that would be your focus?

13 A. Absolutely correct. The firearms log, just to put it
 14 into context, if they still use it today, it's a Word
 15 document and officers like myself keep a number of
 16 different copies of documents that are likely to
 17 populate it quickly, notwithstanding -- you're
 18 absolutely right, that wouldn't enable me to get the
 19 strategy quickly, I would have to try and get that from
 20 another Word document and cut and paste it, which is
 21 very time-consuming.

22 Q. In terms of a round-the-room conversation within Silver,
 23 and you were asked questions about that by the chair
 24 already, the advantage of such conversations happening
 25 early and regularly is that you will spot not only

1 things that have not been done but people who aren't
 2 there.
 3 A. Yes, that's correct.
 4 Q. If you're going round the room to find out what the Fire
 5 Service are doing and there is a deafening silence, that
 6 would tell everybody very early on that there's someone
 7 missing?
 8 A. Yes, that's correct.
 9 Q. Finally, in relation to events of that evening and the
 10 way that command was passed within the firearms
 11 community, do we understand that you set out your
 12 strategy in the firearms log as to what should happen?
 13 A. Yes.
 14 Q. Because there wasn't one already?
 15 A. I wasn't aware of one, that's right.
 16 Q. It certainly wasn't in the firearms log where you would
 17 think to find it?
 18 A. No. As I said, what happens is that normally I would
 19 get sent one from the strategic firearms commander,
 20 I wasn't, because obviously we were just that busy, but
 21 nothing stops me as a tactical firearms commander
 22 getting on with the business of work. I know in Plato,
 23 the strategies are basically the same, I'm
 24 a Gold commander myself, around things like saving
 25 people's lives, preserving evidence, keeping people

93

1 safe, so that's what I was working to, notwithstanding
 2 that you're absolutely right, I didn't get a strategy
 3 and I didn't get anything from the force duty officer.
 4 Q. Were you assuming that there was, so far as the ITFC was
 5 concerned, a strategy that was in place and was ongoing
 6 when you arrived?
 7 A. I think that the force duty officer's initial tactical
 8 firearms commander, what they should do, is they should
 9 do a briefing, they should fill out, as I understand it,
 10 a form that has an overall strategy, working strategy,
 11 threat assessment and then they do the briefing, so
 12 there is a document, albeit for the FDO a one-page piece
 13 of paper that's probably pre-formatted that they do.
 14 Mine's obviously a comprehensive document because I have
 15 got to do more work as the cadre TFC.
 16 Q. Both what he has done, if it has been done, and what you
 17 do are designed, on the one hand, to make sure that the
 18 operation is as effective as it can be --
 19 A. Yes.
 20 Q. -- but also so that your personnel on the ground know
 21 what they are meant to be doing, not least as to when
 22 they should or should not be deploying their firearms?
 23 A. Yes, I think that -- you're absolutely right, on
 24 a spontaneous incident like this, I mean there's plenty
 25 of occasions where spontaneous firearms operations

94

1 become pre-planned or move into the tactical firearms
 2 command phase. It's incumbent on myself as the tactical
 3 firearms commander to ensure that they are re-briefed
 4 for the tactics I want to deploy. Whether that's
 5 a continuation of what the force duty officer gave them
 6 or whether I'm changing the tactics or there's an update
 7 on threat, that's incumbent on me. Because of what was
 8 going on that night I didn't do that briefing until --
 9 I think it was 00.50.
 10 Q. Were you aware whether there had been any such briefing
 11 from anyone before you?
 12 A. No, I'm assuming just from the force duty officer on
 13 initial deployment.
 14 Q. And did you know what he had said as a briefing on --
 15 A. No, I had no knowledge of what that was.
 16 Q. You had identified that this was an appropriate role for
 17 you?
 18 A. Yes.
 19 Q. In particular, is this right, because of the CT aspects
 20 and the fact that CTPOR was going to become involved?
 21 A. Yes. On -- I think certainly when the CTPOR opened,
 22 I moved there. On reflection, Rachel would have been
 23 very capable of doing the role that I undertook and
 24 I could have come in and supported her, but I think the
 25 discussion that we had early, if it went to multi-site

95

1 attacks or some advanced tactics involving some other
 2 assets, then I may have been the best placed with the
 3 experience to deliver those tactics, so I could have
 4 gone straight to the CTPOR but what generally happens
 5 is -- if you imagine the CTPOR, it takes a number of
 6 hours to set up. So that if I'd have gone there
 7 initially, I'd have sat there by myself, if they'd have
 8 let me in, so I would have gone to Silver and we agreed
 9 that the most suitable experienced commander,
 10 notwithstanding that Rachel was experienced, was myself
 11 hence that's why I took the lead role.
 12 Q. So in terms of you reaching your full potential in terms
 13 of what you thought your role was going to become, it
 14 was inevitably going to take some time, first, because
 15 you'd need to get there?
 16 A. Yes.
 17 Q. Secondly, you'd then need to set up --
 18 A. Yes.
 19 Q. -- and do things for all that to happen. Did it not
 20 seem to you and Ms Buckle in your conversation that
 21 there needed to be someone doing the job immediately so
 22 that the ITFC could be focusing on his other set of
 23 initials?
 24 A. I think my expectation, after I spoke to Rachel, was
 25 that she would at least speak to the FDO and agree

96

1 whether he needed to be subject to a handover then or
 2 whether he was capable of maintaining command and
 3 control until I was available to take command and
 4 control.
 5 I think in relation to firearms officers it says in
 6 SOP 47 it's not always practical for the duty officer to
 7 take -- hand over control because if you're dealing with
 8 multiple jobs it's very hard for another firearms
 9 commander to step in.
 10 You're absolutely right, the sooner, the
 11 practicable, the better. After I spoke to Rachel there
 12 was probably an expectation that she may speak to the
 13 duty officer but, yes, on reflection I understand the
 14 confusion that myself getting involved as an extra
 15 firearms commander coming from home has caused or caused
 16 on the night.
 17 Q. Finally in that regard, he, the FDO, had declared Plato?
 18 A. Yes.
 19 Q. Did you know why?
 20 A. No. The assumption -- no, I wasn't told particularly
 21 why.
 22 Q. Because in terms of your taking on the roles to devise
 23 your strategy and also to consider whether Plato should
 24 be carrying on or not, didn't you need to know what the
 25 basis for it was?

1 A. I think that -- yes, I got a handover. If the basis
 2 of -- the question -- sorry, I am trying -- apologies
 3 for my... If the basis is the fact there'd been
 4 a person-borne IED attack and that was the reason for
 5 calling it then, yes, I was aware of that. If there's
 6 other intelligence sat behind that then I'm not aware
 7 of -- I worked on the assumption there was that and
 8 there was the potential for secondary further attacks
 9 involving firearms. That was my -- I think that's what
 10 I put on my firearms log. I didn't ask Dale at any
 11 time, "Why did you call Plato", that's absolutely
 12 correct.
 13 Q. Because it is MTFA, or was, not MTBA, so the bomb was
 14 not a basis in and of itself for Plato, there had to be
 15 more. Either that had happened or that was identified
 16 as being a risk.
 17 A. Yes.
 18 Q. Did you not need to know in terms of identifying what
 19 risk you were managing, what risk it was that was
 20 ongoing?
 21 A. I don't know how -- I got the information when I arrived
 22 at the control room and I was satisfied -- well, I was
 23 aware there wasn't any direct threat or use of firearms
 24 and there hadn't been that evening. So I was working on
 25 the assumption that, yes, there had been a person-borne

1 IED and then maybe -- I think I still was under the
 2 perception that there was an outstanding threat until
 3 I am but -- I think I put into my firearms log: in
 4 possession of other IEDs, potentially in possession of
 5 firearms, and that may be, because of the severity and
 6 nature of the attack, to cause a further attack or to
 7 aid their escape from the scene.
 8 So they had met the criteria for the deployment of
 9 firearms officers because they could be deemed otherwise
 10 (inaudible) to dangerous. But you're quite right
 11 in relation to an actual definition of Plato at that
 12 time I don't think it met the actual definition but
 13 I understand why it was called and my perception was it
 14 was the right decision. It was just a case of managing
 15 some of the communication around why it had been called.
 16 Q. And the communication to make sure thereafter that the
 17 right people got to the right place as quickly as they
 18 could?
 19 A. Yes, that's quite correct. That's all an integral part
 20 of the Plato.
 21 MR ATKINSON: Thank you very much, Mr Thompson. Thank you,
 22 sir.
 23 MR GREANEY: Thank you, Mr Atkinson. Finally, then,
 24 Mr Horwell.
 25 SIR JOHN SAUNDERS: And just before Mr Horwell, or while he

1 is getting ready to ask questions, there has been
 2 a perception in some of the evidence that in this
 3 particular response, there was a concentration on the
 4 armed police part at the expense of the other parts, the
 5 unarmed police and the other agencies.
 6 A. Yes.
 7 SIR JOHN SAUNDERS: Do you think that's fair?
 8 A. I think talking from the armed police side, I think we
 9 had put in a very good structure, a very resilient
 10 structure. But you're quite right, obviously once the
 11 armed police had been, quite rightly, deployed, it did
 12 stay an armed operation for a particularly long time.
 13 Some of that -- as the tactical firearms commander,
 14 perhaps I hold some responsibility for that, but I think
 15 that the unarmed side, my perception was they could move
 16 in and out of the area with the protection of firearms
 17 officers. I think that may have been as a result of not
 18 having a commander or a more defined commander of
 19 unarmed resources at the scene and probably another
 20 result of having an FCP that didn't have that joint
 21 working or understanding.
 22 So I can understand by probably putting a good
 23 firearms structure in and good command there quickly,
 24 probably not stole the show, apologies for that, but
 25 were able to create that perception, that work, because

1 they were all very busy doing their work, that perhaps
 2 meant some of the other aspects weren't as highlighted.
 3 SIR JOHN SAUNDERS: I understand that. So really, what
 4 we've already heard, that the non-appointment of an
 5 unarmed assets commander, particularly in the early
 6 stages before Mr Dexter got there, was a serious fault
 7 in the whole way the thing was being run?
 8 A. That would be probably my perception, sir.
 9 SIR JOHN SAUNDERS: Okay. Is there anything a bit deeper,
 10 that perhaps firearms officers are not as good as
 11 communicating and connecting and acting with the unarmed
 12 assets as they might be?
 13 A. I think first of all there's a communication problem
 14 because we're on a different radio channel.
 15 I think secondly, to some degree, firearms officers
 16 are deploying on a daily basis and working with unarmed
 17 colleagues but actually on a daily basis unarmed
 18 colleagues are told to stay safe, stay away, stay out of
 19 the area, so there probably is some of that.
 20 But I think that you're probably right, there is
 21 probably a better fit, but I think again I go back to
 22 the original points about that communication between
 23 commanders. I think the officers -- I think they have
 24 a good understanding of working but that's that
 25 management of what they should be doing, the officers.

1 I think unarmed officers they would probably think,
 2 "This is a firearms operation, I'll stay away, because I
 3 get told on a daily basis if it's a firearms I should
 4 stay away, so why should I do something differently on
 5 what looks like a more serious firearms operation?"
 6 That's probably only my perception, sir, probably.
 7 SIR JOHN SAUNDERS: You mentioned earlier on -- and then I
 8 will finish Mr Horwell, I am sorry about that -- the
 9 fact they're on different channels. As I understand it,
 10 if they're going to -- so Mr Dexter was saying if he's
 11 going to have both channels, he'd need essentially two
 12 radios --
 13 A. Yes, that's correct.
 14 SIR JOHN SAUNDERS: -- which is impractical?
 15 A. Yes, but I know officers that carry and I carry two
 16 radios. It is impractical and we have generally in
 17 a tactical firearms command suite we do have different
 18 radios on, but you're right it's very impractical. You
 19 can only --
 20 SIR JOHN SAUNDERS: Does it work having unarmed officers
 21 at the same scene and maybe cooperating with the armed
 22 police in different stages on a different channel?
 23 A. Yes, because what happens is the operation may move
 24 quickly, you may get too many people on a Talk Group.
 25 What happens in public order policing, which is very

1 slightly different, if Mark Dexter had a loggist
 2 helper -- what generally happens in public order is
 3 they're on different channels, so someone can listen to
 4 -- your loggist or your staff officer can listen to
 5 different channels for you so you've always got that
 6 awareness, whereas you don't have that on firearms.
 7 SIR JOHN SAUNDERS: Okay, thank you.
 8 Questions from MR HORWELL
 9 MR HORWELL: The handover from one TFC to another. There
 10 are two aspects of this about which you've given
 11 evidence. The danger of a double handover in quick
 12 succession and the danger of too quick a handover.
 13 Now, the problems of each are obvious to the
 14 non-expert as well as to you, but can you give us some
 15 assistance from your experience as a TFC and
 16 a specialist TFC at that, of some of these dangers,
 17 bring them to life to us a bit, if you may?
 18 A. Yes. I think if you even look at some of my firearms
 19 log that evening, even though I took over after spending
 20 20 minutes taking over from other colleagues, there was
 21 still a perception from me at 00.15 for another 30 or
 22 40 minutes that there was an outstanding offender
 23 whereas other people, including the force duty officer,
 24 the ground-assigned tactical, were aware that the
 25 subject may have been deceased. So I think the handover

1 normally on firearms operations can normally take
 2 a period of time so to rush a handover and miss some
 3 vital information or intelligence that in an operation
 4 may go unnoticed, but should it result in something more
 5 critical later on, it'd be quite a key piece of
 6 information that's missing.
 7 So handover should always be done thoroughly.
 8 There's obviously a lot of guidance around the tactical
 9 firearms commanders around when and when you shouldn't
 10 take command and that is when you are in a position to
 11 actually command something. But again, from the duty
 12 officer point of view, it's quite difficult, if not
 13 impractical at times -- and SOP 47 does say it -- it's
 14 only when the FDO is in a position to hand that over
 15 because there may be a number of multiple jobs and phone
 16 calls that he or she is dealing with.
 17 Now, I've known spontaneous firearms operations
 18 never get handed over where I've been a tactical
 19 firearms commander and I have been ready to take it over
 20 but the force duty officer said: we're just about to
 21 resolve it, we're just about to do the house entry, be
 22 available but I may as well finish the job myself.
 23 That's a non-technical term, but: I am so far into the
 24 tactics that for you to take command now is not really
 25 suitable.

1 So handover, if it's rushed, can be very critical or
 2 sometimes it's an inopportune moment but then again if
 3 you actually look at what probably happened on the
 4 night, my perception was we may go to multi-site or
 5 multiple incidents and actually it may never be
 6 practicable to hand over if we don't make a --- if we
 7 don't try and hand over now.
 8 SIR JOHN SAUNDERS: All the information that you would get
 9 from the FDO pretty well would have been on the log at
 10 some stage.
 11 A. The log is a very brief snapshot over hundreds of pages
 12 and the firearms log probably just has what the
 13 resources --- but I'm guessing the actual log itself is
 14 a huge log. To try and sift through that, it would be
 15 quicker to make a new one ---
 16 SIR JOHN SAUNDERS: I'm not suggesting you should sift
 17 through it, I am just trying to find some reconciliation
 18 with the fact --- we all know the FDO is busy, we all
 19 know it's beneficial for him to hand over as soon as he
 20 can.
 21 A. Yes.
 22 SIR JOHN SAUNDERS: But you're saying, actually, the fact he
 23 may not have time to do the handover, that's the real
 24 problem or may --- is there no other way of working out
 25 how someone else working with the FDO could perhaps get

1 the information and have more time to brief you?
 2 A. I think probably --- and obviously you're aware I'm
 3 retired. I think what's happened now in GMP, the ideal
 4 solution is where the firearms commander is co-located
 5 with the duty officer, which didn't happen on the night.
 6 So that would certainly help the handover because
 7 I don't actually have to have been talking to you to
 8 realise what's going on.
 9 SIR JOHN SAUNDERS: No, of course.
 10 A. That is probably solved by co-location, which on the
 11 night is something I had co-located in the past but not
 12 that night because the way the Silver room opens.
 13 SIR JOHN SAUNDERS: Do you know whether other forces
 14 co-locate?
 15 A. I couldn't say at the moment because of my role, sir.
 16 SIR JOHN SAUNDERS: Right, thank you.
 17 A. But I think that's a real positive step now that they do
 18 in GMP.
 19 SIR JOHN SAUNDERS: The question which may be asked is: why
 20 on earth didn't someone realise that before?
 21 A. I don't know the answer.
 22 MR HORWELL: We're going to hear how circumstances have
 23 changed and the questions I ask you are based on what
 24 existed at the time of this attack.
 25 In your witness statement, you said that 00.15 was

1 the earliest opportunity for you to take over.
 2 A. That's right. That's based on --- I was in a position
 3 I could have --- if there had been an incident come in
 4 I could have obviously taken command of that but
 5 I phoned the force duty officer to take over prior to
 6 that but obviously couldn't get through.
 7 Q. To give us an example of how long a handover might take,
 8 you of course had to hand over yourself as TFC on
 9 23 May.
 10 A. That's correct.
 11 Q. How long did that handover last?
 12 A. Up to 90 minutes, I think it took. It was well over
 13 an hour.
 14 Q. If the FDO had asked to be relieved as soon as possible,
 15 you would have done your best to respond to that?
 16 A. Yes. If I'd arrived at the force headquarters and if
 17 the FDO had said to me, "Craig, you've just walked in
 18 but, look, I'm struggling here, I've got these issues",
 19 I'd say, "Give me one to me and I'll take command and
 20 control". It may have taken me a minute or two but
 21 I could have dealt with anything as a spontaneous
 22 incident, I would have been prepared to take on extra
 23 work and certainly if it had required specialist work,
 24 I would have taken it on.
 25 Q. Would you ever have imagined that an FDO would declare

1 Plato but not inform the emergency services?
 2 A. No, sir, I could never think of a circumstance when that
 3 would happen.
 4 Q. Did that cross your mind on the night?
 5 A. No, it never crossed my mind, sir.
 6 Q. You've said you worked on the basis that the emergency
 7 services had been informed.
 8 A. Yes.
 9 Q. And where did you expect the emergency services were
 10 that night, at the scene or elsewhere?
 11 A. I expected the emergency services to be at the FCP,
 12 probably the emergency services to be at the RVP, the
 13 rendezvous point, and also to be arriving at the force
 14 Silver.
 15 Q. On the night itself, did you have any doubt that Plato
 16 was justified?
 17 A. No doubt I think it was justified.
 18 Q. And its continuance?
 19 A. Yes, I think, based on the set of circumstances that
 20 I have given, sir, yes, I think its continuance was
 21 justified. I think communication of its justification
 22 based on the circumstances at the time may have been
 23 enhanced but, yes, I think certainly the continuance
 24 until such time there'd been a thorough assessment in
 25 London or wherever that was going to take place.

1 Q. In terms of command and control at the scene, did you
 2 know on the night that there were two experienced and
 3 highly competent inspectors at the scene acting as
 4 Bronzes, one as Bronze for the scene of the attack and
 5 the station, and the second as cordon Bronze?
 6 A. No. I think I knew that Inspector Smith was present
 7 because I knew Inspector Smith personally having worked
 8 with him, so I heard his name. That's the only one,
 9 although it didn't form part of my plan.
 10 Q. You knew that Silver was at force headquarters?
 11 A. Yes.
 12 Q. And not at the scene, obviously?
 13 A. Sorry, apologies, you mean the Silver -- who, sorry?
 14 Q. Chris Hill.
 15 A. I knew Chris Hill was, yes.
 16 Q. And if the GATFC had asked for additional support,
 17 it would have been provided?
 18 A. Yes, if he'd have asked me for support, yes.
 19 Q. The CTPOR that we have heard about and the emphasis that
 20 you have placed on your being a specialist TFC and
 21 therefore able to operate within the CTPOR --
 22 A. Yes.
 23 Q. -- and you have said that the CTPOR was established by
 24 3 am.
 25 A. About that sort of time, sir, yes.

1 Q. We are concentrating on the operations room and the
 2 Silver and Gold rooms --
 3 A. Yes.
 4 Q. -- and we have spent very little time on the CTPOR. But
 5 that was commanded by a CT commander?
 6 A. That's right.
 7 Q. A very specialist cadre of police commander?
 8 A. Yes. That's right.
 9 Q. Once the CTPOR had been established, if there had been
 10 a second site of an attack, which operations room would
 11 have dealt with the response to it?
 12 A. If the firearms operation was embedded into the CTPOR,
 13 my view -- it would have gone to the CTPOR. But there
 14 is a caveat on that. It would depend how it came in
 15 because what would happen is you'd probably have
 16 a crossover then of the firearms commander in the
 17 Silver, because there would still be a firearms
 18 commander there who's probably got the uniformed assets
 19 and you've got the CTPOR that's probably got more of
 20 your specialist assets. I would suggest that it had
 21 happened there would be a phone call between myself and
 22 the Silver commander upstairs and I would take
 23 responsibility, but we'd agree that through a command
 24 protocol.
 25 Q. We know of course there was not a second attack that

1 night, but a large number of executive actions followed,
 2 arrests and searches, and some of those would have been
 3 firearms operations?
 4 A. I commanded a number personally, yes, sir.
 5 Q. And they were all managed from the CTPOR?
 6 A. Yes, that's correct.
 7 Q. And the information that I have is that between 23 May
 8 and 28 July of that year, the CTPOR was in use for
 9 48 days for this operation.
 10 A. Yes, that may be correct. I worked in it through the
 11 firearms aspect, which was slightly less than that, or
 12 significantly less than that, but for a number of days,
 13 yes.
 14 I think, if I can just put something into context
 15 about the CTPOR which may be helpful. If you look
 16 at the response on the night, you need to look at the
 17 wider context, I would say, because from a critical
 18 response to the incident which takes a number of hours,
 19 what is happening behind that initial response is
 20 clearly going from initial subject to -- the CTPOR sits
 21 behind that slightly to start looking at the wider: are
 22 there outstanding offenders, is there a wider
 23 conspiracy?
 24 This then takes on an investigative role, but this
 25 supports, as I understand it, the Silver, but this

1 starts to then look at firearms operations, deployment
 2 of firearms officers to enable other offenders, other
 3 subjects, to be arrested, and obviously any wider
 4 conspiracy evidence obtained. So these are sort of
 5 going along simultaneously and for the next few weeks
 6 they go along, but the specialist commanders move from
 7 this Silver control room to the CTPOR.
 8 Q. Because of its investigative --
 9 A. Because of its investigative and specialist capacity and
 10 the assets that are available in there.
 11 Q. Finally, just so that we understand what you were
 12 focusing upon, you know that by the time you took
 13 command as TFC, the scene itself was safe or safe
 14 enough, a term that we've heard frequently?
 15 A. Yes, that's correct.
 16 Q. And that there were sufficient firearms officers at the
 17 arena?
 18 A. Yes.
 19 Q. So when you took over as TFC, what were you
 20 concentrating upon: what had happened or what might
 21 happen?
 22 A. I was definitely what I would call forward-facing,
 23 trying to work out what the potential threats were and
 24 putting a firearms operation in to deal with those
 25 threats. That was the first priority. Obviously, once

1 that was in place, it would then be a case of then
 2 trying to look at what resources and what had gone on to
 3 try and inform that threat, that threat analysis, but
 4 certainly the first thing of my mind was to try and put
 5 in an effective operation for future threats that may
 6 come up.
 7 Q. So you're looking forward, not --
 8 A. Yes, that's right, and then ultimately, you're
 9 absolutely right, and obviously when the circumstances
 10 of the attack become known people start getting named as
 11 suspects. As we saw throughout the night -- and I know
 12 we have only touched upon some of the log -- there were
 13 further incidents all over the force area of reports of
 14 gunshots and things like that, so it was trying to put
 15 an operation in so we could respond to all those sorts
 16 of incidents that were going.
 17 MR HORWELL: That's all I ask. Thank you.
 18 MR GREANEY: Thank you, Mr Horwell.
 19 Sir, I have no further questions for Mr Thompson.
 20 SIR JOHN SAUNDERS: Nor do I.
 21 Mr Thompson, I'm really grateful to you for telling
 22 us what happened on the night and also for your insights
 23 on what went wrong and what could be improved. I'm very
 24 grateful, thank you very much.
 25 MR GREANEY: Sir, the next witness will be Laura Lewis.

113

1 Ms Cartwright will call her. We will need to have
 2 a break in any event. Unless it will cause difficulty
 3 to any person, what I suggest is that we take a slightly
 4 early lunch and return early. I'll just check whether
 5 that creates any problem. I can see it doesn't for
 6 anyone, thank you very much indeed.
 7 Can I also indicate that we will need to finish the
 8 evidence today no later than 4 o'clock because of
 9 a commitment that your team have, sir, shortly after
 10 that time.
 11 SIR JOHN SAUNDERS: Thank you. One hour.
 12 (12.33 pm)
 13 (The lunch adjournment)
 14 (1.33 pm)
 15 MS CARTWRIGHT: Good afternoon, sir, the witness in the
 16 witness box is Laura Lewis. Could I ask that she be
 17 sworn, please.
 18 MRS LAURA LEWIS (sworn)
 19 Questions from MS CARTWRIGHT
 20 MS CARTWRIGHT: Could you tell the court your full maim
 21 name?
 22 A. Laura Anne Lewis.
 23 Q. And your current role?
 24 A. I'm the emergency planning command coordinator at
 25 Greater Manchester Police.

114

1 Q. Mrs Lewis, you provided three witness statements to the
 2 inquiry. The first is dated 16 January 2020 and there
 3 should be a copy of that in the bundle in front of you.
 4 Could I ask, are the contents of that statement true to
 5 the best of your knowledge and belief?
 6 A. Yes, they are.
 7 Q. You have then provided a second witness statement dated
 8 13 August 2020. Again, are the contents of that witness
 9 statement true to the best of your knowledge and belief?
 10 A. Yes, they are.
 11 Q. And finally, on 19 April this year, you have provided
 12 a further witness statement. Again, are the contents of
 13 that statement true to the best of your knowledge and
 14 belief?
 15 A. Yes.
 16 Q. Mrs Lewis, I'm going to set out the topics that I'll be
 17 covering with you during your evidence today. I'm going
 18 to start by dealing with your current role and
 19 background. I'll then ask for you to provide assistance
 20 to the inquiry in respect of Talk Groups. Then we'll
 21 deal with tri-service control room communication and
 22 Talk Groups. We'll then move to deal with your role
 23 in the events of 22 May into 23 May 2017. Then finally,
 24 any ongoing developments in respect of the tri-service
 25 Talk Group.

115

1 Can we then deal, first of all, with your role and
 2 background. You have already confirmed the current role
 3 that will you have with Greater Manchester Police and
 4 perhaps if I can summarise your background and
 5 experience. Is it correct that you first joined Greater
 6 Manchester Police in 1978 as a police constable?
 7 A. Yes, that's correct.
 8 Q. And you've had over 43 years of experience in Greater
 9 Manchester Police?
 10 A. Yes.
 11 Q. I think you describe spending most of that time
 12 specialising in communications?
 13 A. Yes.
 14 Q. So is it right that you worked, first of all, for
 15 6 years as a police constable?
 16 A. Yes.
 17 Q. You then became a radio operator in the force control
 18 room?
 19 A. Yes.
 20 Q. From 1995 to 2002, you worked in the training school as
 21 a communication trainer?
 22 A. That's correct.
 23 Q. In 2002 you became part of the Airwave implementation
 24 team responsible for training police officers in the use
 25 of Airwave radios?

116

1 A. Yes.
 2 Q. From 2003 to 20088 you worked for the operational
 3 communications branch, the OCB --
 4 A. Yes.
 5 Q. -- as an Airwave and events planner. And in 2008 you
 6 joined a planning team as a key task manager for
 7 communications?
 8 A. Yes.
 9 Q. And then a key task commander?
 10 A. Yes.
 11 Q. You retired in 2009 as a police officer ?
 12 A. Yes, that's correct.
 13 Q. But then you returned to Greater Manchester Police in
 14 2009 as a member of police staff?
 15 A. Yes.
 16 Q. Since that time, you've already told us, you continued
 17 as an emergency planning command coordinator?
 18 A. Yes.
 19 Q. Could I ask you to give us a general overview of what
 20 that manager role involves, please, the emergency
 21 planning command coordinator?
 22 A. Yes. I look after the force command module, which
 23 consists of two Silver controls and a Gold control, all
 24 located together in one room at the force headquarters,
 25 and I'm responsible for making sure that it's ready for

1 use at all times, that people can simply walk in there
 2 and expect everything to be in full working order and --
 3 I was responsible for the actual construction and layout
 4 of the room when the room was built. I know where
 5 people sit, what agencies are able to work in there,
 6 what's available to them, so I look after that on
 7 a daily basis and my day job is to actually work out of
 8 that room all the time.
 9 So if you like I'm the constant. By its very nature
 10 that room is opened when we have an emergency situation
 11 or we've got pre-planned events and people will come and
 12 work in there for the duration of that event, but I'm
 13 the constant, so I know everything about that room,
 14 I know where things are, how things should work. So
 15 that's -- basically that's my job.
 16 Q. Thank you. We may come back to that when we deal with
 17 the setting-up of the command room on 22 May.
 18 A. Okay.
 19 Q. Can I also ask you to assist us, because you describe in
 20 your witness statement, and I think you currently are,
 21 an Airwave tactical adviser?
 22 A. That's correct. I'm actually the regional -- the
 23 north-west regional lead for Airwave tactical advisers
 24 and also the lead tactical adviser for Greater
 25 Manchester Police. I do this in addition to my day job,

1 if you like.
 2 Q. We'll come on to deal with that in a little more detail
 3 in a moment. First of all, could you just give us a bit
 4 more detail about what an Airwave tactical adviser
 5 actually does, what that involves, please?
 6 A. Yes. Obviously, my background is to do with Airwave, as
 7 we've spoken about, and I went on a training course in
 8 2007 to become an accredited Airwave tactical adviser.
 9 They call it a communications tactical adviser now, but
 10 it was known as an Airwave tactical adviser when I did
 11 the course. It basically equips you to manage the
 12 Airwave Talk Groups and the network and understand how
 13 it works and the complexities of it and understand the
 14 network within GMP, how an incident like the
 15 Manchester Arena attack could impact on that network,
 16 and how to manage it and how to deal with anything that
 17 may arise out of it.
 18 Q. Thank you.
 19 SIR JOHN SAUNDERS: And all you're going to have to do today
 20 is explain to us how that works, in words of one
 21 syllable. Probably.
 22 A. I'll try my very best to do it in simple terms.
 23 MS CARTWRIGHT: N to be clear at this stage then, who would
 24 you be giving that tactical advice about the Airwaves
 25 to?

1 A. To a commander, to a Silver commander if they needed it,
 2 to the force duty officer if they needed it. They're
 3 not expected to be experts in Airwave, but they are
 4 expected to know that they need that advice and to ask
 5 for it.
 6 Q. Thank you. Again we'll look at this in a little more
 7 detail, in particular when we look at the aide-memoire
 8 that Mr Sexton had created.
 9 A. Yes.
 10 Q. You mentioned there your training and that you'd become
 11 a tactical Airwave adviser in 2007. I'm going to very
 12 briefly just draw your attention to your records and
 13 just see if you can provide us with a little more
 14 detail, please.
 15 Mr Lopez, please could you display {INQ041224/2}.
 16 I apologise in advance, the font is very small.
 17 A. It is.
 18 Q. Perhaps if we could expand over the entry for
 19 1 November 2007. We can see there, Mrs Lewis, "Airwave
 20 tac adviser", completed in November of 2007.
 21 A. That's correct, yes.
 22 Q. Could you give us some idea as to what training you have
 23 to undergo before you can be an accredited Airwave tac
 24 adviser?
 25 A. It's three-day, quite intensive, course where the

1 College of Policing explain to you exactly how the
 2 Airwave network works, how the Talk Groups work, how the
 3 multi-agency Talk Groups work, and to understand the
 4 impact of your advice could have on the system if you
 5 gave the wrong advice. I was fairly familiar with
 6 Airwave because, prior to this, I was part of the team
 7 that introduced the radios into Greater Manchester
 8 Police, so I was fairly familiar. But it was still
 9 a very intensive course and you had to, at the end of
 10 it, complete a scenario where it was a role play where
 11 the commander was asking for your advice on a scenario
 12 to do with the Airwave network and how you would deal
 13 with that on the night and how you would put into place
 14 that police officers could communicate with each other
 15 in an appropriate way. It was a pass-or-fail course.
 16 Q. Thank you. Can you assist us then, because you tell us
 17 in your witness statement that you were re-accredited
 18 in June 2017, but looking at the training records we
 19 have here, we can't see any other refresher or
 20 re-accreditation.
 21 A. I have done a few more since 2017, but there was no
 22 formal re-accreditation until that day offered by the
 23 College of Policing. So we did do some but it wasn't
 24 formally recognised.
 25 Q. Is it right that in 2017 that changed where there is now

121

1 a formal process of re-accreditation?
 2 A. Yes, there is, every 12 to 18 months, and I have just
 3 re-accredited in April again.
 4 Q. Thank you. We also see in your training records that
 5 you had casualty bureau -- you had attended a casualty
 6 bureau management course?
 7 A. Yes.
 8 Q. And I think that formed part of your duties on the night
 9 of 22 May; is that correct?
 10 A. No. No, casualty bureau is another -- I think the
 11 casualty bureau has been explained earlier on in the
 12 hearing. Basically I was an operator within the
 13 casualty bureau but I didn't attend and work in there on
 14 that night because I was busy doing my job in the
 15 control room, the Silver control room.
 16 Q. Thank you. Then we can see, in respect of JESIP
 17 training -- I do apologise, the font is a bit small --
 18 I can only see one event in respect of JESIP.
 19 A. That's correct. Is it a JESIP control room manager's
 20 course?
 21 Q. Yes, that's correct.
 22 A. Yes.
 23 Q. Just tell us then, in terms of that training, by way of
 24 overview, what that involved?
 25 A. It was a one-day course involving the fire and ambulance

122

1 equivalent of a control room manager and we worked
 2 through scenarios and talked about how we would work
 3 together in a JESIP way and we went through the JESIP
 4 principles.
 5 Q. We can see that took place on 25 November 2014.
 6 A. Yes.
 7 Q. Other than that JESIP --
 8 SIR JOHN SAUNDERS: We can't see on this actually. Could
 9 you scroll down?
 10 MS CARTWRIGHT: If we could move down, Mr Lopez, to
 11 25 November 2014.
 12 Prior to that JESIP training, had you received any
 13 other --
 14 A. No.
 15 Q. And subsequent to that training in 2014, had you
 16 received any other JESIP training?
 17 A. No formal training. I have looked up things myself in
 18 connection with the role, but no formal training, no.
 19 Q. When you started off telling us about your role as an
 20 Airwave tactical adviser, you indicated it was
 21 in addition to your normal duties.
 22 A. Yes.
 23 Q. So can I ask, how does that role fit with your other job
 24 within the force command module?
 25 A. It fits really well, but it's not my main job, and it's

123

1 probably something I've taken on in addition and made
 2 work better. In GMP we did use to have a formal Airwave
 3 team and I was part of that, but gradually over the
 4 years, as people have retired, that team was disbanded
 5 and it was subsumed into the telecommunications unit,
 6 part of the IS branch. So as regards an operational
 7 slant on how Airwave worked, there was sort of, if I can
 8 say, a little bit of a gap, although I filled it and
 9 I recognised that there was that gap, so I became
 10 recognised as the Airwave tac adviser to go to for
 11 pre-planned events and it sat within my role. So that's
 12 how I developed that fitting-in, if you like.
 13 Q. Describing it as something that fitted in with your
 14 role, was it something that had a set amount of time
 15 that you had to dedicate to that?
 16 A. No, it was in amongst everything else.
 17 Q. At the time of the arena attack on 22 May 2017, how many
 18 Airwave tac advisers were there within Greater
 19 Manchester Police?
 20 A. I would estimate there were probably about seven.
 21 Q. And would it be in the ordinary course of events that
 22 there would be an Airwave tac adviser on call or on duty
 23 on rota every day?
 24 A. No. There was a list -- I maintained a list of all the
 25 currently accredited Airwave tactical advisers and

124

1 I updated that and sent it through to the force duty
 2 officer who maintained that list. And there was no
 3 call —out, we weren't on call or on standby. If somebody
 4 was on a duty, because quite a lot of the Airwave
 5 tactical advisers other than me were operational control
 6 room staff, so if they were on duty, they would be
 7 called upon to give the advice. Other than that, the
 8 force duty officer would go to the list and start at the
 9 top, which just happened to be me, and work their way
 10 down to see who was available to give that advice.
 11 Q. In describing "to give that advice", in the event that
 12 a force duty officer called upon an Airwave tac adviser,
 13 would that require you then to come into the command
 14 module or to go to where the FDO was?
 15 A. Yes. We would do, yes.
 16 Q. So it would just be a case of giving telephone advice?
 17 A. You could do. It would depend what it was. For
 18 something like the Manchester Arena, you would maybe
 19 give an initial quick advice on the phone and say,
 20 "We'll be there shortly". I'm fortunate, I only live
 21 10 minutes away, so I could be there quite quickly.
 22 SIR JOHN SAUNDERS: You'd go where?
 23 A. Wherever I was asked to go.
 24 SIR JOHN SAUNDERS: Normally where the force command module
 25 is —

1 MS CARTWRIGHT: The force command module?
 2 SIR JOHN SAUNDERS: Sorry, there are just so many acronyms
 3 today. Sorry, the FDO. So would you go to where he was
 4 or would you go to —
 5 A. If it was — if we take the incident we're dealing with
 6 today out of it, but if it was some advice that he
 7 needed, I would go there and speak to them directly.
 8 I feel it's always better to understand people face to
 9 face rather than over the telephone.
 10 MS CARTWRIGHT: Thank you.
 11 SIR JOHN SAUNDERS: A somewhat odd view for someone working
 12 in the Airwave system perhaps!
 13 A. Yes. But I'm always conscious —
 14 SIR JOHN SAUNDERS: It's all right, you don't need to
 15 explain, I understand.
 16 MS CARTWRIGHT: Could you assist us in clarifying one
 17 matter? You tell us within your witness statement that
 18 your line manager at the time of the Manchester Arena
 19 attack is the chief inspector of the Specialist
 20 Operations Planning Unit, but you're unable to recall
 21 who that was due to the amount of time that has passed
 22 following the incident?
 23 A. Yes, that's correct. I'm really sorry. We've had quite
 24 a few and I just can't remember which one it was at that
 25 time.

1 Q. I'm going to then now move to the second topic, please,
 2 if you could assist the inquiry in respect of the
 3 background on Talk Groups.
 4 A. Yes.
 5 Q. You've assisted us in your third witness statement with
 6 giving us a degree of detail about Talk Groups and so
 7 I want to use that witness statement, please, Mrs Lewis,
 8 to see if you can assist in giving clarification to the
 9 inquiry, please.
 10 A. Okay.
 11 Q. Could I ask you, first of all, to describe and explain
 12 what a Talk Group generally is?
 13 A. Yes. A Talk Group generally is a radio channel. It was
 14 changed from a radio channel when we went to Airwave for
 15 what reason I don't know. But we refer to them as
 16 a Talk Group and it's just a way of two parties speaking
 17 to each other over a radio.
 18 Q. Again it may seem obvious, but an inter—agency Talk
 19 Group, could you describe what that is, please?
 20 A. Yes. That allows people from different agencies,
 21 police, fire, ambulance, to all speak to each other
 22 depending on their role and as necessary.
 23 Q. At the time of the attack, where were the radio
 24 operators — I don't want you to give us or describe the
 25 location, but would radio operators be at a number of

1 different locations?
 2 A. Yes.
 3 Q. And you tell us, I think, that their terminals where
 4 they worked from were all linked together and linked to
 5 terminals at other OCB sites to form the force's
 6 integrated communications control system?
 7 A. Yes. It sounds rather complicated but basically it's
 8 a computer screen that has squares on it and you can
 9 touch them to pick up which Talk Group you are
 10 designated to deal with that night.
 11 Q. So in terms of a radio operator in one of the control
 12 rooms or in the force command module, would they be
 13 given one dedicated radio Airwave Talk Group to monitor?
 14 A. It could be one, it could be more, depending on what the
 15 circumstances are.
 16 SIR JOHN SAUNDERS: Bearing in mind this is in order to
 17 enable people to talk to each other, whether it be
 18 groups or on individual, why do you need a radio
 19 operator?
 20 A. The radio operator facilitates that speaking to each
 21 other. There are Talk Groups that we use that don't
 22 have a radio operator at the other end, so it —
 23 SIR JOHN SAUNDERS: Sorry, does every call have to go
 24 through the operator?
 25 A. No, no, not at all.

1 SIR JOHN SAUNDERS: So what's the operator doing?
 2 A. Making a note of what's said, facilitating that talk --
 3 so --
 4 SIR JOHN SAUNDERS: Sorry, I don't understand what's meant
 5 by "facilitating that talk".
 6 A. Let me try and think how to explain it. The Talk Group
 7 on the night of the arena attack was working from
 8 a particular control room. That's generally the Talk
 9 Group that allocates incidents to police officers, they
 10 go and deal with them, and they pass the message back,
 11 so the command and control system is updated. That's
 12 our general way of working in the operational control
 13 rooms.
 14 There are a number of other Talk Groups that are out
 15 there that aren't used by radio operators, and one is
 16 the one that the FDO was on the night, the firearms
 17 Talk Group.
 18 SIR JOHN SAUNDERS: So that doesn't have an operator?
 19 A. Not always. We can have one if it's required.
 20 And when I say facilitate, basically if there is any
 21 clarification -- and they will seek that clarification,
 22 because sometimes if you're on a radio, you don't always
 23 hear the full conversation. You may --
 24 SIR JOHN SAUNDERS: So who will seek the clarification?
 25 A. The radio operator.

129

1 SIR JOHN SAUNDERS: Because he is making a note?
 2 A. Yes or could be making a note on to the incident log.
 3 SIR JOHN SAUNDERS: Right. So somebody's ringing in and
 4 speaking to the operator?
 5 A. Somebody's using the radio to speak to the operator,
 6 yes.
 7 SIR JOHN SAUNDERS: Right. Could he be speaking to someone
 8 else, another individual who's doing the job, rather
 9 than the operator or is it simply I'm calling to the
 10 operator to say --
 11 A. If it's an operator--staffed Talk Group, it generally has
 12 gone through the operator, yes.
 13 SIR JOHN SAUNDERS: Okay. Thank you.
 14 MS CARTWRIGHT: Perhaps then if we could look just at
 15 a document to assist with some of those Talk Groups,
 16 please.
 17 Mr Lopez, please could you display {INQ040441/1}.
 18 The channel numbers themselves are operationally
 19 sensitive, but terminology has been used to enable
 20 identification of those Talk Groups. The witness does
 21 have the channel numbers themselves, but we're obviously
 22 anxious not to reveal the channel numbers themselves.
 23 So Mrs Lewis, could we just then look -- so can we
 24 see there a Talk Group "GMP firearms Talk Group"?
 25 A. Yes.

130

1 Q. Is that the Talk Group You identified to the chairman
 2 a moment ago that was the one that was used by the FDO
 3 on the night?
 4 A. Yes.
 5 Q. It's described there as:
 6 "A national firearms Talk Group that GMP is able to
 7 access to coordinate national firearms resources and was
 8 utilised on the night of the attack"?
 9 A. Yes, that's correct.
 10 Q. Is it correct that that firearms Talk Group allows for
 11 firearms officers from outside of Greater Manchester
 12 Police to access the same Talk Group?
 13 A. Yes.
 14 Q. I think you've indicated a moment ago that that doesn't
 15 need to be monitored, is that right, by a radio
 16 controller?
 17 A. Yes, it doesn't need to be. There's no hard and fast
 18 rules. If somebody wanted to put a radio operator on
 19 there to make a log of what was being said, then they
 20 could do that, there's a choice to do that, but
 21 generally it's controlled by the FDO or the tactical
 22 firearms commander.
 23 SIR JOHN SAUNDERS: How this operates in practice, the FDO,
 24 at an incident like the arena, he decides he needs other
 25 firearms officers from other forces to come in?

131

1 A. Yes.
 2 SIR JOHN SAUNDERS: So he will put out a message, it will
 3 just say, "We need to call up particular forces"?
 4 A. No, sir. They would have to be notified that GMP had an
 5 incident, they were using that Talk Group to command and
 6 control that incident, but those officers coming in from
 7 the other forces would be told that they were using that
 8 Talk Group and they would have it in their radios.
 9 I think it's important to understand that each force has
 10 a fleet map of Talk Groups and not all forces are the
 11 same, but there are a number of common Talk Groups
 12 within each officer's radio that allow for this
 13 interoperability, and the firearms Talk Group is
 14 specifically in every firearms officer's radio within
 15 the country.
 16 So a GMP radio would have every other force in the
 17 country's firearms Talk Group in it, so if GMP were
 18 called upon to go to London, (overspeaking) --
 19 SIR JOHN SAUNDERS: They could click --
 20 A. Yes. So they would have to --
 21 SIR JOHN SAUNDERS: So let's deal with the practicalities
 22 again.
 23 I'm the FDO, I want Cheshire firearms officers to
 24 come in. I then have to somehow get a message to
 25 Cheshire firearms, "Would you send us a number of ARVs?"

132

1 A. That's right, yes.
 2 SIR JOHN SAUNDERS: Right. And then they presumably would
 3 say, "Yes, sending in so many"?
 4 A. Yes.
 5 SIR JOHN SAUNDERS: And they would then tell their ARVs that
 6 they will be on the national firearms channel?
 7 A. Yes, on GMP's national firearms channel.
 8 SIR JOHN SAUNDERS: Once they know that, they click on to
 9 it, and then when the FDO wants to speak to them, to
 10 say, "Go to wherever" --
 11 A. Yes, they can hear it.
 12 SIR JOHN SAUNDERS: And they can respond to it?
 13 A. Yes.
 14 SIR JOHN SAUNDERS: And there's no operator involved?
 15 A. No.
 16 SIR JOHN SAUNDERS: Thank you.
 17 MS CARTWRIGHT: And I think when we look at the chronology
 18 of work you were doing with Jo Hoyte that we'll come on
 19 to, is it correct that that GMP firearms Talk Group, the
 20 national firearms Talk Group, was at the time of the
 21 arena attack subject to a 3-month trial --
 22 A. Yes.
 23 Q. -- that commenced on 4 April of 2017?
 24 A. That's right, yes.
 25 Q. Before that time, is it correct that GMP had a separate

133

1 firearms channel that was just accessible to GMP
 2 firearms officers?
 3 A. That's correct, yes.
 4 Q. Just staying with this document, just to identify two
 5 other Talk Groups, please. We can see there's
 6 a Manchester Central Talk Group.
 7 A. Yes.
 8 Q. And we can see the text that sits alongside that:
 9 "This was the principal Talk Group used by GMP
 10 during the immediate response to the attack."
 11 Is it correct that when the reporting of the attack
 12 first came in, that was the first Talk Group that was
 13 used to manage the initial stages of the incident?
 14 A. Yes, and that's the one I explained earlier on, where
 15 the radio operator is covering that area and dealing
 16 with any incidents that come in to them to allocate
 17 police officers to attend. So they would get the job on
 18 to their screen, they would look at it, it would
 19 automatically go to them because it's on that area, and
 20 they would send the appropriate resource. So when the
 21 call came in for the arena, that job would have appeared
 22 to them in the initial stages and they would deal with
 23 that in the initial stages.
 24 SIR JOHN SAUNDERS: And the operator needs no authority to
 25 do that?

134

1 A. No, no. Because you simply don't know which jobs are
 2 going to end up as huge as this one did. They may be
 3 routine burglaries, routine shoplifters --
 4 SIR JOHN SAUNDERS: I think we understand that. I am sorry
 5 to cut across you.
 6 A. It's okay.
 7 SIR JOHN SAUNDERS: So it comes in, there's been a bomb
 8 exploding, so the operator says what?
 9 A. They would --
 10 SIR JOHN SAUNDERS: "As many of you as can be, get there"?
 11 A. If it was me, I would be directing it to the inspector
 12 in charge and telling them about it because that's the
 13 person who would then coordinate the response. I can't
 14 say what happened on the night, but as a radio operator
 15 previously, that's what I would have done: I would have
 16 gone to the most senior person who I would think would
 17 coordinate it.
 18 SIR JOHN SAUNDERS: And he would be located at the same
 19 place as you, he or she?
 20 A. No. The radio operators are in one room, and we're
 21 looking after a group of police officers who work from
 22 different police stations. And these ones happened to
 23 be on the night the ones that were covering the city
 24 centre of Manchester.
 25 SIR JOHN SAUNDERS: So the phone call comes in, bomb attack,

135

1 multiple casualties, to the radio operator. The radio
 2 operator then contacts which inspector?
 3 A. They would know who would be the on-call duty inspector
 4 for that area and they would also bring that incident to
 5 the attention of their supervisor within the room and
 6 the force duty officer, because obviously it's the
 7 potential -- it had the potential to be a big incident
 8 and it was.
 9 SIR JOHN SAUNDERS: Who decides the resource to be sent out?
 10 A. The inspector or -- the radio operators do that all day
 11 every day, they receive an incident and they decide,
 12 based on the resources they've got available to them,
 13 who goes to that incident.
 14 SIR JOHN SAUNDERS: But we're talking about this specific
 15 incident, the bomb. We are not talking about
 16 a burglary. It has to be referred to the inspector?
 17 A. It doesn't have to be, there's no hard-and-fast rules,
 18 I'm just explaining what I would have done had I been a
 19 radio operator on that occasion.
 20 SIR JOHN SAUNDERS: And if you refer it to the inspector,
 21 does the inspector then tell you what amount of
 22 resources to send?
 23 A. Potentially, yes.
 24 SIR JOHN SAUNDERS: Potentially, but if you speak to him,
 25 would he?

136

1 A. Yes. Well, I would expect so, yes.
 2 SIR JOHN SAUNDERS: I am sorry to tie you down.
 3 A. It's a long time since I've been a radio operator, so
 4 I can't speak for the radio operator on the night.
 5 SIR JOHN SAUNDERS: The FDO gets notified and we will come
 6 to that in a minute. Does he have any input into what
 7 unarmed resources to send to the scene?
 8 A. No, I wouldn't think so, but he could ensure that there
 9 are sufficient if the inspector, the local inspector,
 10 hadn't been available for whatever reason.
 11 SIR JOHN SAUNDERS: And how does the FDO get to know? Does
 12 the operator speak to the FDO or do they send a message?
 13 A. They send a message. I think you may have had this
 14 explained --
 15 SIR JOHN SAUNDERS: They refer the log to them in some way?
 16 A. They have a screen and you do something called a switch
 17 and it appears at the bottom of their screen.
 18 SIR JOHN SAUNDERS: Yes. We have heard about that, so
 19 thank you.
 20 Then the message from the inspector to send all
 21 available resources, or something like that, would go
 22 back to the operator who would then broadcast it?
 23 A. That's right, yes.
 24 SIR JOHN SAUNDERS: Thank you.
 25 MS CARTWRIGHT: In terms of the Manchester Central Talk

137

1 Group, that's not a multi-agency Talk Group, is it.
 2 A. No.
 3 Q. So it's only GMP, the relevant individuals, that can
 4 access that Talk Group?
 5 A. Yes. It will be the officers who are working on the
 6 city centre that night on that shift who would be on
 7 that radio Talk Group.
 8 Q. We see then sitting below the Manchester Central Talk
 9 Group, the Silver control Talk Group.
 10 A. Yes.
 11 Q. Is it correct that there came a time, because the
 12 Manchester Central Talk Group was dealing with all
 13 incidents in respect of Manchester city centre, where
 14 effectively the arena attack was hived off into the
 15 Silver control Talk Group?
 16 A. Yes, that's correct.
 17 Q. So again, in terms of the Silver control Talk Group,
 18 that was just a Talk Group that was accessible to
 19 Greater Manchester Police?
 20 A. No, those particular Talk Groups -- that's part of what
 21 I would do as an Airwave tac adviser, I could reasonably
 22 expect that an incident of this magnitude would need us
 23 to ask for mutual aid from surrounding forces. So when
 24 we decided to use that Talk Group, it was with that in
 25 mind, that going forward, if we needed mutual aid,

138

1 we wouldn't have to mess about changing people's Talk
 2 Groups or trying to move people around too much. So
 3 after we -- once Silver control was open and we had got
 4 people in place, we'd spoken with Mr Randall about the
 5 Talk Group, and we moved everything that was to do with
 6 the arena incident on to that Silver. And indeed we
 7 also brought across from the control room one of the two
 8 operators that had started that incident off for
 9 continuity.
 10 So it was almost really a short amount of time where
 11 we said, "Right, the incident is moving on to this Talk
 12 Group", but it then carried on seamlessly, really.
 13 SIR JOHN SAUNDERS: Do you have to tell all the police
 14 officers who have responded that they need to move on to
 15 another Talk Group?
 16 A. Yes, you do.
 17 SIR JOHN SAUNDERS: In relation to the other agencies, you
 18 told us they can get on to that Talk Group.
 19 A. No, not that Talk Group. That one is for police
 20 officers from other forces for mutual aid.
 21 SIR JOHN SAUNDERS: All right (overspeaking).
 22 A. Sorry, mutual aid from other police forces.
 23 SIR JOHN SAUNDERS: Did you actually call in other police
 24 forces?
 25 A. Yes.

139

1 SIR JOHN SAUNDERS: Not just firearms?
 2 A. Not just firearms. I'm perhaps talking later on in the
 3 event, but certainly from the next day and going forward
 4 for the continuing 4 weeks that Silver control was open,
 5 yes, we had a lot of mutual aid from all around the
 6 country.
 7 SIR JOHN SAUNDERS: So they need to be told: get on to this
 8 Airwave?
 9 A. Yes.
 10 SIR JOHN SAUNDERS: And they've got something on their radio
 11 that allows them to do that?
 12 A. Yes, each radio in the country has a small selection of
 13 Talk Groups within their radio that allow this mutual
 14 aid.
 15 SIR JOHN SAUNDERS: I don't think we need more detail than
 16 that probably. That helps me, thank you very much.
 17 MS CARTWRIGHT: Could British Transport Police be permitted
 18 access to that Silver control Talk Group?
 19 A. Yes.
 20 Q. You described how on the night, and we'll come on to the
 21 night in more detail, how the individual radio operator
 22 who had been working on the Central Talk Group then
 23 moved across on to the Silver control Talk Group.
 24 A. Yes, that's correct. Along with others that came
 25 across.

140

1 Q. And can I then check because we've heard some evidence
 2 from Mr Randall that he had to physically move
 3 locations.
 4 A. That's right.
 5 Q. Would that radio operator had also have to move
 6 locations?
 7 A. Yes, but it's not that far really in the grand scheme of
 8 things at that time of night.
 9 Q. So the moving across of the radio operator who had
 10 managed the Central Talk Group was again a physical
 11 moving to the force command module?
 12 A. Yes. The idea was that we moved one of the radio
 13 operators so while they were travelling the original
 14 other radio operator, because there were two on the Talk
 15 Group on the night, they would have stayed with it, and
 16 they would have carried on that, so the radio operator
 17 then, when they got to the other room, they would stop
 18 and they would start, so there's that continuity.
 19 If it would have been me, I would have given them
 20 a handheld radio to take with them so they had the
 21 situational awareness while they were travelling.
 22 I don't know if that happened, but that's what I would
 23 have recommended.
 24 Q. Before we come on to deal with the multi-agency Talk
 25 Groups, and Mr Lopez -- thank you. You have mentioned

141

1 the radio handsets.
 2 A. Yes.
 3 Q. We've heard some evidence from Mr Dexter last week about
 4 the functionality of those handsets. Could you just
 5 assist us about how those handsets work, please, and in
 6 particular the press-to-talk button?
 7 A. Yes. So the radios, I don't know if you've seen one,
 8 they have a press-to-talk button on the side. So if you
 9 want to speak, you have to press that button to speak.
 10 If there is already somebody speaking on the radio, you
 11 can't physically overtalk them. So you have to wait in
 12 a queue and the way to wait in the queue is to keep
 13 your -- on our particular radios that Greater Manchester
 14 Police use, you have to keep your finger pressed on to
 15 the press-to-talk button and then the network knows and
 16 let's you in at the next opportunity and it forms
 17 a queueing system, if you like.
 18 SIR JOHN SAUNDERS: That's what Mr Dexter didn't know?
 19 A. To be fair, sir, I think lots of police officers may
 20 forget that because, generally, they can get through
 21 most occasions they want to, it's only in times of lots
 22 of police officers wanting to pass information that this
 23 system would become effective, really.
 24 SIR JOHN SAUNDERS: You say forget that. Would they ever
 25 have known that?

142

1 A. I certainly think they were trained because I was one of
 2 the trainers that rolled it out. Obviously that
 3 training, that we did, the initial roll-out finished,
 4 and the training -- whether that training identifies
 5 that now I can't say, I am really sorry, but I know we
 6 did say that when we rolled it out.
 7 SIR JOHN SAUNDERS: When did you roll it out?
 8 A. Was it...
 9 MS CARTWRIGHT: The introduction of Airwave was in 2003 and
 10 I think Mr Dexter referenced training in 2004.
 11 A. Yes. That's when we did it. Probably I did that for
 12 about a year and a half. After that, I know we included
 13 it in our training to officers because we went all
 14 around the force and individually trained everybody.
 15 SIR JOHN SAUNDERS: On a day-by-day basis you wouldn't need
 16 to use this facility where you keep pressing down?
 17 A. No, when it's slow time, you can hear that somebody's
 18 talking, you wait while they've finished and then you
 19 take your turn.
 20 SIR JOHN SAUNDERS: You press again?
 21 A. You press again and it's your turn to speak. Obviously
 22 that night was really, really busy, lots of people
 23 passing information and that system -- that's how the
 24 queueing system works.
 25 SIR JOHN SAUNDERS: Thank you.

143

1 MS CARTWRIGHT: Just to confirm, so you press the
 2 press-to-talk button?
 3 A. Yes.
 4 Q. Does it make that audible noise then as you're in the
 5 queue?
 6 A. Yes, it makes a sort of -- you could hear it in the
 7 background. I heard it on the background of the
 8 recordings, yes.
 9 Q. So you go into the next space in the queue?
 10 A. Yes, you just keep it held and it will let you in as
 11 soon as there's a space.
 12 Q. But if you then release that press-to-talk button you go
 13 straight to the back of the queue?
 14 A. Yes.
 15 SIR JOHN SAUNDERS: Sorry to be so granular, but how do you
 16 know when to go? Does someone say "go ahead"?
 17 A. There's a tone on the radio that says you're free to
 18 speak.
 19 SIR JOHN SAUNDERS: There's a tone?
 20 A. Yes. When the radio -- when the person finishes
 21 speaking there's a tone that lets you know that the
 22 radio is free.
 23 SIR JOHN SAUNDERS: And do you need to keep the button held
 24 down then?
 25 A. Um... Yes, because then you need to speak --

144

1 SIR JOHN SAUNDERS: When you're speaking?
 2 A. Yes, you have to keep the button held, yes.
 3 MS CARTWRIGHT: You also describe that there's other
 4 functions as well that allow you to skip the queue or
 5 indicate that you are an emergency.
 6 A. Yes.
 7 Q. Could you first of all describe how the urgent callback
 8 function works?
 9 A. If you press and hold one of the keys on the keypad,
 10 that's been set up as a shortcut to send an urgent
 11 callback feature so the radio operator on that
 12 particular Talk Group -- and it lights up on their
 13 screen to say that that person has asked for an urgent
 14 callback. So it's not quite an emergency, but they want
 15 to speak more urgently, so if they press that button,
 16 what should happen is the radio operator should ask
 17 other people to be quiet and ask that person what their
 18 problem is or what they need to pass that's urgent. So
 19 the radio operator can overspeak everybody, so they
 20 don't join that queue, they can overspeak anybody.
 21 SIR JOHN SAUNDERS: So I am holding my button down and
 22 someone is peaking and in order to -- I press any key on
 23 the keypad?
 24 A. If you want to indicate to the radio operator -- it's
 25 not any key, it is a particular key.

145

1 SIR JOHN SAUNDERS: And you hold it down?
 2 A. Press it, hold it, and then release.
 3 SIR JOHN SAUNDERS: So it's a two-hand job at that stage?
 4 A. Yes.
 5 SIR JOHN SAUNDERS: Thank you.
 6 MS CARTWRIGHT: Below that sits a callback feature. Could
 7 you explain that, please?
 8 A. That is a similar thing, it just means it's not as
 9 urgent. What we would do under normal circumstances,
 10 we would do something called a point-to-point callback
 11 to that officer. On the night of the arena because it
 12 was so busy, that's one of the things we asked people
 13 not to do, so we would go over the radio and ask them
 14 what the problem was.
 15 Q. We'll look at point-to-point, I think, with some
 16 messages that you had dealings with on the night.
 17 A. Yes.
 18 Q. Then you also describe that in very urgent situations
 19 there's a further button that could be pressed, the
 20 emergency button?
 21 A. That's right.
 22 Q. Could you explain how that operates?
 23 A. Yes. It's a button on the top of the radio that's
 24 coloured red, so there's no mistake about what that
 25 button is. The user just presses and holds it, releases

146

1 it, and then it sends a status message to the radio,
 2 which tells it it's an emergency status, and then the
 3 officer or the person pressing the emergency button can
 4 speak over the radio without having to press that
 5 press-to-talk button. There is a little bit more to it
 6 but that's essentially how it works.
 7 Q. You indicate that for a radio operator to be in a
 8 position to see all these alerts they will need to be
 9 monitoring the relevant Talk Group?
 10 A. Yes.
 11 Q. So it requires as well as someone pressing the button
 12 someone at the other end to be viewing to see --
 13 A. Yes, and they would see that anyway because it's very
 14 clear that when there is an emergency situation on the
 15 radio, it sends an alarm, it makes a noise, and it
 16 outlines the Talk Group for that particular Talk Group
 17 in red, so you're absolutely under no illusion that
 18 somebody needs an emergency.
 19 Q. Then perhaps finally in respect of radio functionality,
 20 point-to-point. You've indicated on the night
 21 point-to-point was not used for the radio control to
 22 speak directly to those using the handsets.
 23 A. Yes.
 24 Q. Is that just because of how busy demand was?
 25 A. That's one of the things we learnt on the Airwave

147

1 tactical adviser's course, the point-to-point facility
 2 basically is the ability for one police officer or radio
 3 operator to speak directly to another police officer
 4 without using the network -- well, they use the network
 5 but they're not going out over the Talk Group, they're
 6 almost speaking to them directly. Does that make sense?
 7 Q. Yes. So there's an ability for those with radios to
 8 themselves speak directly to one another as well?
 9 A. Yes. So what we do in times of busy radio traffic, we
 10 ask the officers not to do that. Two reasons:
 11 point-to-point takes up more capacity on the Airwave
 12 network and, while they are on that point-to-point call,
 13 they are effectively away from the radio Talk Group, so
 14 they are not listening to what's going on, so they won't
 15 know if there is a problem. The idea is that they
 16 should really stay on the Talk Group, it's a big event
 17 and we need them to listen, so point-to-point primarily,
 18 we ask them not to do for that reason, and for the other
 19 reason being the network -- making sure that the network
 20 capacity is at its best.
 21 SIR JOHN SAUNDERS: So if I'm one of the unarmed officers
 22 at the arena and I want to -- and I'm a sergeant or
 23 Bronze commander and I want to contact one of my people
 24 in order to say, "I want you here now", you don't want
 25 them to do that?

148

1 A. We prefer them not to.
 2 SIR JOHN SAUNDERS: You want them to make a call to you?
 3 A. Well, to the control to ask -- I mean, the
 4 Bronze commander could theoretically just go on to the
 5 air knowing it was free and shout that officer up and
 6 that's --
 7 SIR JOHN SAUNDERS: That's what you would prefer to happen?
 8 A. We teach that. When we teach in Silver control, we want
 9 the Bronze commanders to speak directly to their
 10 resources.
 11 SIR JOHN SAUNDERS: Okay.
 12 MS CARTWRIGHT: There is reference that we're going to come
 13 on and look at to how using point-to-point can drag the
 14 system.
 15 A. That's just that capacity issue again. So when we are
 16 looking at the Airwave network overall, we are aware
 17 that the site that can -- there are Airwave radio sites
 18 around Manchester and we have to understand the capacity
 19 of that site and how many police officers' radios can
 20 attach to it. On the night of the attack, at its peak,
 21 there was a thousand radios attached to that site. So
 22 to then put on point-to-point and telephony on top of
 23 that would affect the network and what we really want to
 24 do is the voice traffic to be the priority rather than
 25 point-to-point on telephone calls, so we ask people not

149

1 to do that. It doesn't drag it over, but it does affect
 2 it.
 3 Q. Drag it over? What does that mean, please?
 4 A. That's common terminology that police officers use. It
 5 means that they can't get through basically because the
 6 point-to-point -- if somebody was point-to-pointing,
 7 it would leave less capacity for voice. I'm trying to
 8 explain it in a really simple way and I hope it's
 9 understandable.
 10 Q. In giving that answer as well you have referenced the
 11 impact that people doing normal phone traffic can have
 12 on the functionality of the system.
 13 A. That's right.
 14 Q. How does making a telephone call affect the operation
 15 the system?
 16 A. The same thing really. It affects the capacity of the
 17 Airwave sites. There are so many slots for voice and
 18 point-to-point and telephony take up more of those
 19 slots.
 20 Q. Would that have to be a telephone that's issued from
 21 Greater Manchester Police or any telephone?
 22 A. No, the radio --
 23 SIR JOHN SAUNDERS: I think you're talking about radio,
 24 you're talking about a telephone, I think.
 25 A. Sorry. I'm talking about --

150

1 SIR JOHN SAUNDERS: You're talking about point-to-point
 2 radio calls?
 3 A. The radio also has a facility to act as a telephone, so
 4 you can make -- and I could ring you on your mobile
 5 phone from a radio.
 6 MS CARTWRIGHT: So when you have talk about telephony --
 7 A. On the radio.
 8 MS CARTWRIGHT: -- that's on the radio?
 9 A. That's on the radio, yes.
 10 MS CARTWRIGHT: You tell us --
 11 SIR JOHN SAUNDERS: We probably ought not to be asking this
 12 in public or getting an answer, we'll know later, but
 13 perhaps at some stage you can either write down further
 14 what these radio calls are going through, ie whether
 15 it's similar to what mobile phone calls are going
 16 through or whatever, but I think we'd probably better
 17 not do that in public.
 18 A. Yes, yes.
 19 MS CARTWRIGHT: You tell us in your witness statement that
 20 some Talk Groups are monitored 24 hours a day, 7 days
 21 a week by Greater Manchester Police and other Talk
 22 Groups are kept ready to be used for specific purposes
 23 as required?
 24 A. Yes.
 25 Q. So in terms of the Talk Groups we looked at a moment

151

1 ago, so the GMP one, the Manchester Central Talk Group
 2 would be monitored 24 hours a day, 7 days a week?
 3 A. Yes.
 4 Q. Similarly, would the GMP firearms national Talk Group --
 5 A. The force duty officer listens to that 24/7, yes.
 6 Q. And then in terms of the Silver control Talk Group that
 7 was established on the night, is that something that's
 8 specifically set up --
 9 A. Yes.
 10 Q. -- so would be monitored during an incident?
 11 A. Yes.
 12 Q. I'm going to ask you then similar questions now about
 13 the other relevant multi-agency Talk Groups. I'm not
 14 going to use the document that was created and we looked
 15 at a moment ago, but a schedule that was created and
 16 provided by Mr Randall. {INQ041227/1}.
 17 Again, we're not going to reveal the names
 18 themselves, but again we've got general description of
 19 the different multi-agency Talk Groups that were
 20 available. So perhaps if we start at the top with the
 21 police Hailing Talk Group. In terms of that Talk Group,
 22 we can see it enables immediate contact from other
 23 police forces, including BTP, to GMP's control room.
 24 A. That's correct, yes.
 25 Q. That's monitored 24 hours a day, 7 days a week.

152

1 A. That's correct.
 2 Q. In the control room?
 3 A. Yes.
 4 Q. In terms of wider knowledge about that police Hailing
 5 Talk Group, is that widely known?
 6 A. Well, it should be. It's very common, and it's a way of
 7 police officers contacting a particular police force if
 8 they are entering their area. So if we were sending
 9 people to other forces on mutual aid, that's generally
 10 recognised as the first point of contact for that force
 11 to say: we are here in your area and then they will be
 12 directed to whichever Talk Group they should be using
 13 subsequently.
 14 SIR JOHN SAUNDERS: We know that BTP were having real
 15 trouble getting hold of the FDO --
 16 A. Yes.
 17 SIR JOHN SAUNDERS: -- and indeed they weren't the only
 18 ones. Could they have used that? Would you expect them
 19 to use it?
 20 A. Absolutely, yes.
 21 SIR JOHN SAUNDERS: Right.
 22 MS CARTWRIGHT: If you can assist us, please do, because
 23 we can see in your witness statement you are able to say
 24 from the review work that was done as to who did utilise
 25 these various Talk Groups.

153

1 A. Yes.
 2 Q. So are you able to assist us as to whether at any point
 3 during the incident, on 22 May into 23 May, British
 4 Transport Police used that police Hailing Talk Group?
 5 A. In the records I have not found any evidence of that.
 6 SIR JOHN SAUNDERS: But other people did on the night?
 7 A. Not the police Hailing Talk Group.
 8 SIR JOHN SAUNDERS: So that was not used the whole night by
 9 anyone?
 10 A. It probably was but not in regards to the arena. It may
 11 have been the mutual aid officers coming in later in the
 12 event who used that as their initial contact to GMP when
 13 they were on the way to the force area. It's
 14 a police--only one, that, it's not multi--agency.
 15 SIR JOHN SAUNDERS: Thank you.
 16 MS CARTWRIGHT: Turning then to the next point down,
 17 a multi--agency Hailing Talk Group. We can see that that
 18 Talk Group:
 19 " ... enables immediate contact from other agencies,
 20 including Greater Manchester Fire and Rescue Service,
 21 North West Fire Control and NWAS, to Greater Manchester
 22 Police's control room."
 23 Again, is it correct that that Hailing group, the
 24 multi--agency one, is monitored 24 hours a day, 7 days
 25 a week in the GMP control room?

154

1 A. Yes, that's correct.
 2 Q. Again, in terms of your witness statement, we can see --
 3 and I can take you to it, sir, if needed -- you give an
 4 example of one use that night of the multi--agency
 5 Hailing Talk Group.
 6 A. Yes.
 7 Q. Is it correct that the only use you've been able to
 8 identify for that multi--agency Hailing Talk Group was
 9 a query and a call from HMP Manchester?
 10 A. Yes, that's correct.
 11 SIR JOHN SAUNDERS: What call?
 12 MS CARTWRIGHT: A call from HMP Manchester.
 13 SIR JOHN SAUNDERS: Thank you.
 14 MS CARTWRIGHT: So only that, none of the tri--service
 15 partners used that tri--service Hailing Talk Group?
 16 A. I have not seen any evidence of that.
 17 SIR JOHN SAUNDERS: Let's suppose I'm BTP and I can't speak
 18 to the FDO and I come up on this Hailing group. What
 19 would then happen to get me --
 20 A. There's a radio operator who monitors that Talk Group
 21 24/7 and it's the team 3 radio operators, which you may
 22 have been told about, that sit directly in front of the
 23 force duty officer. So from here to you, sir. They
 24 would hear that call and either turn round and speak to
 25 the FDO, if they were available, or the FDS, make

155

1 themselves known, and say, "BTP need to speak to you".
 2 SIR JOHN SAUNDERS: And they could then -- can he then go on
 3 to that radio?
 4 A. He could do, yes, or he could say, "Well, ring me on
 5 whatever number", or, "I can contact you".
 6 SIR JOHN SAUNDERS: Thank you.
 7 MS CARTWRIGHT: Then moving down, please, to the next Talk
 8 Group, the operational multi--agency Talk Groups, and
 9 there are three of those. We've been given information
 10 with this document, and I just want to check if this
 11 fits with your understanding of that operational
 12 multi--agency Talk Group. That Talk Group was
 13 established to enable communication between multi--agency
 14 commanders at an operational level but can be used for
 15 multi--agency communication at any level, including
 16 between control rooms; is that correct?
 17 A. Yes, it can be, yes.
 18 Q. In terms of that operational multi--agency Talk Group,
 19 three of them, they are monitored in the Greater
 20 Manchester Police control room once established as the
 21 agreed method of communication?
 22 A. Yes. It's not, like the other two, monitored 24/7.
 23 It's a process that would have been gone through to say
 24 we're ready to use those.
 25 Q. We'll look in a little more detail at that when we look

156

1 at the work that was done around JESIP Talk Groups.
 2 SIR JOHN SAUNDERS: So sorry, I just want to go back. The
 3 third one down, the operational multi-agency Talk
 4 Groups. You've told me that BTP could have used it if
 5 they wanted to?
 6 A. Yes.
 7 SIR JOHN SAUNDERS: Right. We know that the NILO for
 8 Greater Manchester Fire and Rescue Service wished to
 9 speak to the FDO and couldn't get through. Could he
 10 have used that?
 11 A. Not until it had been established and opened. I think
 12 you'll hear evidence from me later on, sir, about us
 13 trying to -- that Talk Group was available to be used,
 14 it was undoubtedly there. But there was no -- you would
 15 have needed to have rang the fire and rang the ambulance
 16 to say, "We're using that Talk Group for this
 17 inter-control room use". What we did later on was try
 18 and make that routine and it was already -- you know, as
 19 soon as there was an incident declared, it would use
 20 that.
 21 SIR JOHN SAUNDERS: So this is what happened -- was
 22 activated a couple of days later after a which meeting
 23 took place; is that right?
 24 A. That's right, but we've done some work --
 25 SIR JOHN SAUNDERS: All ready to go but no one had actually

157

1 got round to pressing go?
 2 MS CARTWRIGHT: I think that's something slightly different,
 3 sir.
 4 SIR JOHN SAUNDERS: Anyway, this one was not usable by the
 5 NILO on that night?
 6 A. Not without -- he couldn't -- if he'd have shouted up on
 7 that night without the FDO asking them to, there would
 8 have been nobody currently at the other end of it. It
 9 needed that agreement, that between the control rooms.
 10 So if FDO had said, "I want to use this Talk Group to
 11 speak to the fire and ambulance", at that time they
 12 would have had to have made a phone call to the other
 13 control rooms to say, "We're going to use that Talk
 14 Group to allow people to speak to each other". So there
 15 needed to be at that time that formal recognition that
 16 that is what they were going to use and inform people.
 17 SIR JOHN SAUNDERS: Thank you.
 18 A. It's not like the other two where that's 24/7 monitored
 19 and we know there's going to be someone at the other
 20 end.
 21 SIR JOHN SAUNDERS: So we've got a police Hailing group, we
 22 have a multi-agency group, and the multi-agency would
 23 have been available to --
 24 A. You've got the police Hailing group which is for police
 25 to police.

158

1 SIR JOHN SAUNDERS: Yes, 24/7, any police force can ring up.
 2 A. Multi-agency, 24/7. But then you've got this
 3 operational multi-agency Talk Group which essentially is
 4 designed for operational commanders from the three
 5 services to speak to each other should they not be
 6 co-located but can be used -- it was intended to be used
 7 by the FDO because of his aide-memoire to be used as
 8 that inter-control room link but it still would have
 9 needed someone to have made that phone call to put it
 10 into action.
 11 SIR JOHN SAUNDERS: So if on the night NWFC had wanted more
 12 situational awareness of what was going on and wasn't
 13 getting information, they could have rung on the
 14 multi-agency Hailing Talk Group; is that right?
 15 A. That's correct, yes.
 16 SIR JOHN SAUNDERS: Thank you.
 17 MS CARTWRIGHT: Perhaps just then before we move away from
 18 the operational multi-agency Talk Group, if we could
 19 look at the aide-memoire of the FDO in respect of how
 20 he had envisaged in that aide-memoire that operational
 21 multi-agency Talk Group should be activated.
 22 {INQ040955/1}. In terms of the document, because
 23 the actual Airwave Talk Group has been removed from it,
 24 first of all the aide-memoire itself.
 25 Before the arena attack, were you aware of this

159

1 aide-memoire that had been created by Mr Sexton?
 2 A. No, I wasn't, no.
 3 Q. But in the course of your preparations for today have
 4 you had an opportunity to review the unredacted --
 5 A. Yes, I have, yes.
 6 Q. In terms of the communication and the establishment of
 7 the Talk Group that's referenced in that document under
 8 JESIP, is it correct that that identifies the use of the
 9 operational multi-agency Talk Group?
 10 A. One of them, yes, it does.
 11 Q. So in terms of what that document envisaged is that that
 12 would be the Talk Group that would be established and
 13 used by the FDO?
 14 A. Yes.
 15 SIR JOHN SAUNDERS: And it never was?
 16 A. No.
 17 MS CARTWRIGHT: So had, as the aide-memoire had indicated,
 18 Mr Sexton asked for that operational multi-agency Talk
 19 Group to be established, that would have allowed the
 20 control rooms to speak to one another; is that correct?
 21 A. Yes, but as I mentioned before, they would have had to
 22 have made a telephone call to each of those control
 23 rooms first to tell them that that was being established
 24 because we hadn't got any agreement that was what
 25 it would be used for at that time. I think it does say

160

1 that in there, doesn't it?
 2 "Will be nominated by the FDO when contacting each
 3 ILO."
 4 So he's saying to the two ILOs from the two
 5 services, "That's what Talk Group we're going to use",
 6 and I would imagine he would expect them to tell their
 7 respective control rooms.
 8 Q. The two ILOs being the NILO with Greater Manchester Fire
 9 and Rescue Service and the NWAS NILO?
 10 A. That's right, yes.
 11 Q. In terms of this operational multi-agency Talk Group,
 12 it is right, isn't it, that prior to the attack there
 13 was an established system operating at Greater
 14 Manchester Police where every Sunday that operational
 15 multi-agency Talk Group would be tested?
 16 A. That's correct, yes.
 17 Q. And the testing of that operational multi-agency Talk
 18 Group would involve NWAS?
 19 A. Yes.
 20 Q. And it would involve Greater Manchester Fire and Rescue
 21 Service --
 22 A. Yes.
 23 Q. -- via North West Fire Control?
 24 A. Yes.
 25 Q. So there was an established system of checking that

161

1 everybody could use that system?
 2 A. Yes, but again, that was set up during the week and
 3 the -- it was tested by the control room comms as
 4 Manchester Airport and they would be notified of who
 5 they would need to ring to say, "We're going to do the
 6 test". So it wasn't -- they didn't just shout up at
 7 10 o'clock and expect those people to be there; they
 8 rang them and said they were going to do the test and
 9 then the test was carried out.
 10 SIR JOHN SAUNDERS: Someone has to set it up and that's the
 11 FDO?
 12 A. On the night of an event, yes. What Ms Cartwright --
 13 SIR JOHN SAUNDERS: The testing is Manchester Airport?
 14 A. That's right, yes.
 15 MS CARTWRIGHT: Just whilst we've got this document open as
 16 well, we can see that under Airwaves, it was intended on
 17 this FDO aide-memoire:
 18 "To identify an Airwaves tac ASAP."
 19 And just before we move away from this document, on
 20 22 May of 2017, did Mr Sexton identify an Airwaves tac
 21 or request one?
 22 A. Not that I am aware of, no.
 23 Q. Again just to be clear, what role could an Airwaves tac
 24 have in terms of if Mr Sexton had identified and spoken
 25 to an Airwaves tac adviser?

162

1 A. They could have made sure that that JESIP Talk Group was
 2 opened and used.
 3 Q. Just to perhaps give us an example of how -- what would
 4 have to be done as someone who does perform and did
 5 perform as the lead Airwaves tac adviser --
 6 A. I would have done what I have just described. If he'd
 7 have rang me and said we need to set up this Talk Group,
 8 before all the work I'd done, I would have rang the two
 9 control rooms and said, "The FDO has requested that we
 10 use a Talk Group between the control rooms, we're going
 11 to use this one, have you got it available", because we
 12 couldn't make that assumption that they had within their
 13 control room. So that was part of the work I was doing
 14 to try and check all that earlier on.
 15 Q. Again, just to give us some idea, that's a telephone
 16 call to two control rooms, but how long realistically
 17 could that step take?
 18 A. As quick as you can make two telephone calls.
 19 SIR JOHN SAUNDERS: I don't really understand that if it's
 20 tested on Sunday to make sure it's available, how could
 21 it be that they might not have it available on Monday?
 22 A. It's available in all handheld radios, so the NILOs
 23 would have it in their radio -- I don't want to mix
 24 things up, but the work I was doing was ensuring that it
 25 was available in the control rooms because we were

163

1 intending it to be control room to control room. So
 2 I had great knowledge of how GMP works and GMP comms,
 3 but what I didn't know is how the ambulance and fire
 4 set-up was in their control rooms and whether they had
 5 the ability to put these Talk Groups on to their
 6 computer system or even if they had it in their
 7 handhelds. I assumed they had it in the handhelds, and
 8 they did, so it would have been that way they would have
 9 monitored it within the control rooms. Does that make
 10 sense? I can explain that a little bit more if you
 11 want.
 12 SIR JOHN SAUNDERS: So you knew because of the Sunday night
 13 testing that you could get through to their control
 14 rooms because --
 15 A. No, because the testing weren't done to the control
 16 rooms, the tests were done to the NILOs. The control
 17 rooms weren't -- as far as I am aware didn't participate
 18 in that test, it was just the actual officers that
 19 participated in the test.
 20 SIR JOHN SAUNDERS: But when you want to set it up, you've
 21 got to ring the control room?
 22 A. Absolutely, yes.
 23 SIR JOHN SAUNDERS: You need to make sure they can contact
 24 their NILOs on it or put them on it?
 25 A. These Talk Groups were originally intended for one of

164

1 those Talk Groups that didn't have a radio operator
 2 at the other end, it was just for the commanders from
 3 the three services to speak to each other, to get
 4 situational awareness, to discuss things. It's this
 5 using of it for the control rooms that's a different
 6 concept.
 7 SIR JOHN SAUNDERS: So you could have set it up, could you,
 8 just to contact the NILOs?
 9 A. They would still have had to have been made a telephone
 10 call to tell them it was set up.
 11 SIR JOHN SAUNDERS: But you knew it worked from Sunday
 12 night?
 13 A. Yes.
 14 SIR JOHN SAUNDERS: So once you'd rung them --
 15 A. It would be on, yes.
 16 SIR JOHN SAUNDERS: But that wouldn't allow for the control
 17 rooms?
 18 A. Well, it could've done, but the work I was doing
 19 previous to that was to discover whether that was
 20 a proper -- it was not a false assumption that they
 21 could do it. That's why we visited the control rooms to
 22 check on that.
 23 MS CARTWRIGHT: Taking this Talk Group at what it was
 24 intended to be, as an operational commander's Talk
 25 Group, what this Talk Group could certainly do is allow

165

1 Greater Manchester Police's operational commander to
 2 speak to NWAS's operational commander at the same time
 3 as Greater Manchester Fire and Rescue Service's
 4 commander?
 5 A. Yes, that's correct.
 6 Q. Can I ask, in terms of if there was a further blue light
 7 service such as British Transport Police, could they
 8 have been permitted access also --
 9 A. Yes.
 10 Q. -- on to the same operational commander's Talk Group?
 11 A. Yes, all those multi-agency Talk Groups are available in
 12 all police officers' radios throughout the country for
 13 each police force.
 14 Q. And we'll come on to look at what Talk Groups could be
 15 used for the control rooms to speak together, which
 16 I think you clarified as a separate piece of work that
 17 you and Jo Hoyte were doing in 2017.
 18 A. To try and stop this need to make a phone call, all of
 19 that.
 20 SIR JOHN SAUNDERS: Sounds like a good idea.
 21 A. It was just a little bit too... not finished off on
 22 time.
 23 MS CARTWRIGHT: Going back, please, to Mr Randall's
 24 document, please, {INQ041227/1}. We can see then
 25 sitting below the operational multi-agency Talk Group is

166

1 the tactical multi-agency Talk Group. In terms of that
 2 Talk Group, is it correct that that was intended for the
 3 tactical commanders in the different services to, if
 4 activated, speak to one another on the same Talk Group?
 5 A. Yes, that's correct.
 6 Q. Again, once activated, it would be monitored in the
 7 Greater Manchester Police control room as the agreed
 8 method of communication?
 9 A. Yes.
 10 SIR JOHN SAUNDERS: So this is open to who? Would this be
 11 open to Gold?
 12 A. No, this is the tactical commanders.
 13 SIR JOHN SAUNDERS: To Silver?
 14 A. Yes.
 15 SIR JOHN SAUNDERS: And they would have a button on their
 16 radios? How do we limit who can actually get on to it?
 17 You have to ring them up, do you?
 18 A. Yes, if you want to use it, yes.
 19 SIR JOHN SAUNDERS: You give them a ring and say, "If you
 20 want to use this, then get on to this channel"?
 21 A. Yes, that's right.
 22 SIR JOHN SAUNDERS: And then anyone who had the capacity to
 23 get on to this channel could if they were told about it?
 24 A. Yes, but generally it was only used between those
 25 tactical level commanders if necessary.

167

1 SIR JOHN SAUNDERS: Okay. And this one wasn't used on the
 2 night either?
 3 A. No, because generally within Greater Manchester the
 4 tactical-level commanders have tended to co-locate.
 5 SIR JOHN SAUNDERS: Okay. They certainly do after a while,
 6 but some of them, because they live a distance away,
 7 take some time to get in. Would that have been a way
 8 of --
 9 A. Could have been yes.
 10 MS CARTWRIGHT: In terms of this being a Talk Group
 11 envisaged for tactical commanders, if that means there
 12 are a number of GMP tactical commanders, they could
 13 equally be on that same Talk Group with the tactical
 14 commander from Greater Manchester Fire and Rescue
 15 Service --
 16 A. Yes.
 17 Q. -- NWAS and British Transport Police?
 18 A. Yes.
 19 Q. So would it be fair to say that Talk Group was intended
 20 so that everyone had the same situational awareness?
 21 A. At that level, yes. It's fair to say, though, that
 22 these are only titles. Although it's titled the
 23 tactical multi-agency Talk Group, had I been requested
 24 for another Talk Group for a different purpose within
 25 that, we could have used any of those Talk Groups. It's

168

1 just a label. We just need to make people aware of
 2 which one we would be using.
 3 Q. Just as the chairman has already clarified, no tactical
 4 commanders used that Airwave on the night, did they?
 5 A. As far as I am aware, no.
 6 Q. So even if it wasn't used as a tri-service tactical
 7 command Airwave, it could certainly be used, even if
 8 just GMP had activated it, by the various GMP tactical
 9 commanders?
 10 A. Yes, that's another Talk Group for them to use, it's
 11 just one that an Airwave tac adviser could give advice
 12 about if they asked for a different Talk Group, yes.
 13 Q. In terms of who would need to activate the tactical
 14 multi-agency Talk Group, how quickly could that be
 15 established please?
 16 A. It's the same, it's there for use. It just needs either
 17 people to be made aware of it or a protocol to use it.
 18 Q. But at any point could any of the tactical commanders
 19 have said, "I want a tactical multi-agency Talk Group to
 20 be established"?
 21 A. Yes, they could, even from the other services, fire and
 22 ambulance.
 23 Q. Thank you.
 24 I'm going to move next, please, to the third topic,
 25 which is the identified need for a tri-service

169

1 inter-control room Talk Group. You have set out within
 2 the witness statements that you've provided the history
 3 that led to your involvement in looking into the
 4 feasibility of which would be the most appropriate Talk
 5 Group to enable the tri-service control rooms to speak
 6 to one another.
 7 A. Yes.
 8 Q. Is it correct that that was in essence looking to deal
 9 with what had been identified in JESIP as something that
 10 was necessary in terms of JOPs 3?
 11 A. Yes, that's correct.
 12 SIR JOHN SAUNDERS: But you've already got it, haven't you,
 13 if you make a phone call to them all?
 14 A. Yes, we have. I think JOPs 3 looks at making that
 15 formalised and identifying it as a thing. Before that
 16 I don't think people had this inter-control room way of
 17 working.
 18 SIR JOHN SAUNDERS: But is it meant to be automatic, as it
 19 were? Is this a difference, automatic without the phone
 20 call?
 21 A. That's what we're trying to do, yes, automatic without
 22 the phone call.
 23 MS CARTWRIGHT: Was the intention that that would be
 24 something that was just monitored and open as an open
 25 Airwave rather than one that would only be monitored

170

1 once it was activated.
 2 A. I think JOPs 3 basically says there needs to be some
 3 form of communication between the three control rooms.
 4 It suggests a Talk Group but it also talks about
 5 telephone calls, open telephone lines, but we thought
 6 that Airwave was the easiest and the most flexible way
 7 to do that.
 8 SIR JOHN SAUNDERS: And 24/7?
 9 A. Yes.
 10 MS CARTWRIGHT: Can I ask if we can briefly look, please, at
 11 JOPs 3. Mr Lopez, please could you display
 12 {INQ008372/10}.
 13 It's a page of JOPs that the chairman is well
 14 familiar with, but we can see at paragraph 4.4 it was
 15 envisaged:
 16 "The police will instigate a three-way
 17 telecommunication link between the emergency services'
 18 control rooms. This line of communication should be
 19 maintained until ambulance and Fire and Rescue Service
 20 representatives are operational within an agreed
 21 tactical coordinating group. All three agencies will
 22 agree when it is appropriate to discontinue this link."
 23 A. Yes, that's the footnote that says it may be an
 24 interoperable Talk Group, a telephone conference call or
 25 other method, and we decided to go down the

171

1 interoperable Talk Group line.
 2 SIR JOHN SAUNDERS: So there is nothing there to say it has
 3 to be 24/7. Indeed, it's even talking about stopping
 4 it.
 5 A. Yes.
 6 SIR JOHN SAUNDERS: So that's not doing it?
 7 A. Yes.
 8 SIR JOHN SAUNDERS: You had that, though, didn't you? You
 9 had to activate it?
 10 A. Yes, we did have that.
 11 SIR JOHN SAUNDERS: You had it in accordance with 4.4 --
 12 A. Yes.
 13 SIR JOHN SAUNDERS: -- but what you were planning was to
 14 have one open 24/7 --
 15 A. Yes.
 16 SIR JOHN SAUNDERS: -- because the FDO, as happened here,
 17 might forget or decide not to --
 18 A. No, just so that if any of the control rooms wanted to
 19 pass any METHANE messages or anything urgent they would
 20 use that and we would know that Talk Group was there
 21 available to use rather than to make the telephone call
 22 to ask for it.
 23 MS CARTWRIGHT: Can I ask you so I'm clear: in terms of
 24 before you started the work with Jo Hoyte, what was the
 25 system that was in place at GMP for the establishment of

172

1 the communication between the three control rooms?
 2 What was the Airwave and Talk Group?
 3 A. It would be that a request was made for a Talk Group to
 4 be used, an Airwave tac adviser would nominate one of
 5 the Talk Groups that would be used, which we've talked
 6 about before, and that the telephone call would be made
 7 to activate that Talk Group. So until we formalised
 8 that procedure you still have to make that telephone
 9 call.
 10 Q. We can see that this version of JOPs came into effect in
 11 January of 2016, but that paragraph is almost identical
 12 to a paragraph in the earlier version of JOPs. So could
 13 I ask what brought this to a head in 2017 as to it being
 14 looked at by you and Jo Hoyte?
 15 A. We attended two firearms officers briefings, commanders'
 16 briefings, at Greater Manchester Fire and Rescue Service
 17 in our capacity as Airwave tactical advisers, and this
 18 was discussed there.
 19 And then we also went along to Exercise Hawk River,
 20 which was a similar thing, and we were asked our
 21 opinions about how it could be used and from then this
 22 is when we started the work to formalise that procedure.
 23 SIR JOHN SAUNDERS: Let me make it clear. This
 24 establishment that you're talking about of the three-way
 25 Talk Group which is open all the time between the

173

1 control rooms, which you hadn't got round to
 2 implementing, was it necessary for you to do that to
 3 comply with JOPs 3 and/or JOPs 2 or not?
 4 A. Probably not, but it took away that need to make
 5 a telephone call to set it up and hopefully it would be
 6 in people's muscle memory that they would use that
 7 in that case that they needed it.
 8 SIR JOHN SAUNDERS: Thank you.
 9 MS CARTWRIGHT: You deal with this area in your third
 10 witness statement in more detail, although you touch
 11 upon it in others, as describing the development of
 12 a standard operating procedure on the multi-agency
 13 tactical Talk Group. Could you just assist us as to
 14 what it was that -- why there was a need for this
 15 standard operating procedure to be developed at that
 16 time?
 17 A. It was so that there was an understanding between all
 18 three agencies of what we would do in that situation and
 19 how it would be done.
 20 Q. You mentioned Operation Hawk River and could I ask,
 21 please, for the debrief report from Operation Hawk River
 22 to be displayed. It's {INQ004529/1}.
 23 Were you involved in Hawk River?
 24 A. Yes.
 25 Q. In terms of then -- is it this debrief that further

174

1 highlighted the need for this standard operating
 2 procedure?
 3 A. I didn't attend the debrief, I just went to the
 4 exercise.
 5 Q. But did you receive the copy of the debrief?
 6 A. I can't remember, sorry. I probably did, but I can't
 7 remember it individually.
 8 Q. Could I ask you then if we could turn to page 6,
 9 Mr Lopez {INQ004529/6}.
 10 Under "Communication", for recommendation, there's:
 11 "A consistent theme throughout the exercise was
 12 Airwaves, particularly around the tri-services'
 13 communication protocols with conference calls and use of
 14 emergency services operational and Silver/tactical
 15 level ..."
 16 I think those are the two commander Talk Groups
 17 we've dealt with?
 18 A. Yes.
 19 Q. And it goes on:
 20 "... set up and available for all three blue light
 21 services and this should be accessed for Silver/tactical
 22 decision-making. Multiple agencies deployed have no
 23 single Talk Group and no ability to broadcast to all
 24 agencies for either instruction to minimise Talk Group
 25 usage, stop telephony over Airwave, minimise

175

1 point-to-point, et cetera, and no ability for an
 2 individual to warn or inform. This is further
 3 complicated when assets such as BTP..."
 4 I won't list the others involved:
 5 "There could be numerous Airwave channels in use by
 6 various responders and agencies and this would need
 7 a significant amount of coordination. All blue light
 8 services highlighted they have communication protocols
 9 in place to ensure the safety of unarmed staff attending
 10 a major incident. All responders require clear
 11 unambiguous instructions on the nature of the incident
 12 and their individual and team responsibilities."
 13 So was this your understanding as to the basis then
 14 for the tasking and the work you were to do?
 15 A. Probably, yes.
 16 Q. Then if we perhaps look at some of the documents,
 17 please, that chart the work. Because was it linked in
 18 any way to the reissued Plato guidance that was issued
 19 by the National Police Chiefs' Council in March 2017?
 20 A. I think we'd already started the discussions after the
 21 commanders' exercise and Hawk River, so I think that
 22 just formalised it, if you like, our decision to do it.
 23 Q. What was it about that reissued Plato guidance that was
 24 being a catalyst for the work that you and Jo Hoyte were
 25 doing?

176

1 A. Because it gave the emphasis on this
 2 control—room—to—control—room communication.
 3 Q. Is that from what we've looked at already in JESIP?
 4 A. Yes.
 5 Q. Were people not saying that actually that wasn't
 6 something new, it was something that was
 7 well—established and should have been well—established
 8 at that time?
 9 A. I think it was established because of this ability to
 10 use these Talk Groups. I know I keep going back to it,
 11 but I think it's this making it formalised and... If
 12 you'd asked me on the night, I would have set it up, but
 13 it's just formalising it and understanding it. That was
 14 all, really.
 15 SIR JOHN SAUNDERS: Okay. So I just don't understand that
 16 bit about communication —
 17 A. No, it's —
 18 SIR JOHN SAUNDERS: — because it seems to be indicating
 19 that there was no way of the multi—agencies communicates
 20 whereas you have told me that actually if someone made
 21 a phone call then it could have been set up.
 22 A. Yes.
 23 SIR JOHN SAUNDERS: Did people just not know that?
 24 A. I think the problem with Airwaves, sir, is that it can
 25 be quite complicated and you rely on people who know and

177

1 show an interest to guide them and if they don't know
 2 then they don't know, sorry.
 3 SIR JOHN SAUNDERS: JESIP doesn't work very well without it,
 4 does it?
 5 A. Not at all, no.
 6 MS CARTWRIGHT: Perhaps if we look over the page for
 7 Hawk River to {INQ004529/7}. Under "Good practice" it
 8 identifies again those two multi—agency channels under
 9 the evidence of good practice.
 10 A. Yes, but that's between the commanders, not between the
 11 control rooms.
 12 Q. Again, was it correct that Hawk River, as we can see
 13 at the second bullet point, again indicates the need to
 14 appoint an Airwaves tactical adviser at the earliest
 15 opportunity?
 16 A. Yes, that would be me. I took every opportunity I could
 17 at things like this to say you do need an Airwaves
 18 tactical adviser.
 19 Q. Could we then please look at an email from 28 March?
 20 {INQ016884/2}.
 21 I mentioned a moment ago the issued National Police
 22 Chiefs' Council's Plato guidance that was issued on
 23 28 March and we can see you are one of the individuals
 24 copied in to that email from Jo Hoyte.
 25 A. Yes.

178

1 Q. We can see that again it was highlighting that:
 2 "Forces should ensure that as part of their plaining
 3 process for an Operation Plato incident, planners,
 4 commanders and advisers are aware of the guidance and
 5 have considered it in the context of their local force
 6 structures and plans. All Airwave tactical advisers
 7 within GMP are included within this circulation and the
 8 recommendation is that it's shared locally with your own
 9 force Airwave tactical advisers. Laura Lewis and I are
 10 currently working on a GMP Airwave tactical adviser's
 11 guide for Op Plato which we will happily share with you
 12 once it has been signed off."
 13 A. Yes.
 14 Q. So can I ask then in terms of what discussion had taken
 15 place between you and Jo Hoyte about creating that
 16 tactical adviser's guidance for Plato?
 17 A. It was one of the things we wanted to do to give the
 18 less experienced Airwave tactical advisers some guidance
 19 on the way to do it. Jo and I lived and breathed it
 20 every day and we talked about it and had discussions
 21 about it. We were really comfortable in what we were
 22 talking about, so it was just to try and make it
 23 understandable for the less experienced Airwaves
 24 tactical advisers.
 25 Q. Can we just add into this that I think Jo Hoyte was in

179

1 counter—terrorism, is that —
 2 A. She was yes, but she was also an Airwaves tactical
 3 adviser and we worked together to enable things between
 4 the counter—terrorism world and the other world to work
 5 together.
 6 Q. As of the time of the arena attack had you created that
 7 Operation Plato tactical Airwaves advice?
 8 A. No, it was still a work in progress.
 9 Q. Had there been any indication as to when that work would
 10 be completed?
 11 A. We were trying to get everything together so it was all
 12 completed together and that we could say it was done and
 13 here is the finished product, but obviously we got
 14 overtaken by the events of 22 May.
 15 SIR JOHN SAUNDERS: So no Airwaves tactical adviser was
 16 appointed on 22 May; is that right?
 17 A. No.
 18 SIR JOHN SAUNDERS: Whose responsibility is it to do it?
 19 A. The force duty officer would request one and it was
 20 actually on his aide—memoire as well.
 21 SIR JOHN SAUNDERS: Yes. I've realised that. Who else
 22 would do it if he had forgotten to do it or become
 23 overwhelmed?
 24 A. Any commander could do it.
 25 SIR JOHN SAUNDERS: Any commander could do it. Does anyone

180

1 have the responsibility to check it in particular?
 2 A. No, and on the night, and you'll hear that in a bit,
 3 although I wasn't turned out to be an Airwave tactical
 4 adviser, after a certain period of time within my role
 5 I decided myself to take that upon and look at things
 6 and make sure things were in place.
 7 SIR JOHN SAUNDERS: We need to have a break at some stage.
 8 MS CARTWRIGHT: Now would be a good time to take a break,
 9 please.
 10 SIR JOHN SAUNDERS: Ten minutes. We're not going on beyond
 11 4.00, as I understand it.
 12 (2.58 pm)
 13 (A short break)
 14 (3.08 pm)
 15 MS CARTWRIGHT: Mrs Lewis, we may be quicker if we use the
 16 foundation of your third statement to chart through the
 17 history of the tri-service control room work that you
 18 and Jo Hoyte were doing.
 19 If I could just ask you to turn to your
 20 paragraph 33, please. Perhaps it's right, as you've
 21 already indicated, that it is worth stressing from the
 22 outset that the means of establishing three-way
 23 communications -- sorry, are you there?
 24 A. I was in the wrong statement, sorry. Yes.
 25 Q. You stress from the outset that the means of

181

1 establishing three-way communications between the
 2 emergency services using Airwaves had been available
 3 since around 2010/2011.
 4 A. That's correct, yes.
 5 Q. I think what you go on to say is that:
 6 "The work that you and Ms Hoyte were doing prior to
 7 the arena attack was focused on formalising the
 8 arrangements by which the three emergency services'
 9 control rooms would communicate via a dedicated Talk
 10 Group in the event of a major incident including MTFA."
 11 A. Yes.
 12 Q. You go on to say that:
 13 "Notwithstanding the steps we were taking to
 14 formalise the arrangements, the capability to establish
 15 such a link had been in existence for many years."
 16 A. Yes.
 17 Q. You've already set out --
 18 SIR JOHN SAUNDERS: I'm really sorry. I'm struggling. It's
 19 entirely my fault and I had determined to say less but
 20 I'm not going to do that.
 21 So you already had the facility before this work
 22 you're doing to set up the three-way Airwave?
 23 A. Yes.
 24 SIR JOHN SAUNDERS: The only difference, as I understand
 25 what you've said so far, between what happens pre this

182

1 work that you're doing and post this work, which
 2 unfortunately is after 22 May, is that it would not
 3 require a phone call to set it up?
 4 A. Absolutely, yes.
 5 SIR JOHN SAUNDERS: Thank you.
 6 MS CARTWRIGHT: Thank you.
 7 You then go on to say:
 8 "On 22 February 2017 Jo Hoyte, who is an Airwave
 9 tactical adviser for Counter-terrorism Police
 10 North-west, and I attended the JOPs commander training
 11 that was run which Sergeant Whittle."
 12 And you recall that JOPs 3 and the paragraph that
 13 I have taken you to already, 4.4, was dealt with.
 14 A. Yes.
 15 Q. And you have flagged that that talks about a three-way
 16 telecommunication link or a telephone conference call?
 17 A. Yes.
 18 Q. You go on to say:
 19 "[You] can recall discussions at the training
 20 session about the communication link between control
 21 rooms. The multi-agency tactical Talk Group and
 22 multi-agency operational Talk Groups were all available
 23 to be used to establish this link in the event of
 24 an MTFA. But [you] and Ms Hoyte suggested it would be
 25 a good idea to formalise the link which would be used."

183

1 During that discussion that was taking place in
 2 training was anyone saying that actually it wasn't
 3 needed because the systems already existed?
 4 A. No, I think they appreciated the efforts we were making
 5 to formalise it rather than this phone call
 6 intervention.
 7 Q. You say:
 8 "We decided on the multi-agency tactical Talk Group,
 9 so the tactical commanders' group, because the
 10 multi-agency operational Talk Groups 1, 2 and 3 were
 11 more likely to be used operationally whereas the
 12 multi-agency tactical Talk Group was seldom used because
 13 tactical commanders would tend to co-locate at force
 14 headquarters."
 15 A. Yes, that's correct.
 16 Q. Was this a discussion that just you and Jo Hoyte were
 17 having or was it with all of those commanders that were
 18 at that training?
 19 A. We had the discussion between ourselves, but I'm almost
 20 sure that we spoke to Sergeant Whittle about it as well
 21 as a firearms person, just to check whether our
 22 understanding of what could be used was okay. But as
 23 I said to you before, they're just names, and we decided
 24 on that one because of the reasons we've given in the
 25 statement.

184

1 Q. You also say that you thought that an Airwave Talk Group
 2 would be quicker to establish than a conference call
 3 in the event of an MTFA.
 4 A. Yes.
 5 Q. And you say it takes a matter of seconds to establish
 6 communication on an Airwave Talk Group?
 7 A. Yes, that's correct.
 8 Q. Would that not be the same on a conference call?
 9 A. You still have to make a telephone call to the other
 10 person to set that up and if the phones' engaged or
 11 whichever number they've used -- yes, I think that would
 12 take a little bit longer.
 13 Q. And then you have already told us about attending
 14 Exercise Hawk River on 1 March 2017. And we've looked
 15 briefly at that debrief report which included
 16 a recommendation to:
 17 "Create an SOP for appropriate use of Airwaves
 18 channels. In the event of any major incident all
 19 services default to Silver tactical and Bronze
 20 operational activity if not co-located."
 21 A. Yes.
 22 Q. So in reality, was Hawk River flagging the use of Talk
 23 Groups that already existed?
 24 A. Yes, it was.
 25 Q. You indicate that after that Exercise Hawk River,

185

1 Sergeant Whittle asked you and Jo Hoyte to create that
 2 SOP?
 3 A. Yes.
 4 Q. You also indicate that you, on 15 March, with Ms Hoyte
 5 attended Greater Manchester Police's OCR and spoke to
 6 Chief Inspector Mike Booth to discuss implementing this
 7 means of tri-service communication between control rooms
 8 and you say it was agreed that checks would need to be
 9 conducted at the control rooms of North West Fire
 10 Control and NWSA to ensure they had the means to access
 11 the Talk Groups?
 12 A. That's correct, yes.
 13 Q. Again, did Inspector Mike Booth make any comment in
 14 terms of the work that was being done or did he support
 15 also what was being --
 16 A. No, he was very supportive as a firearms commander
 17 himself and he agreed with the way we were going and,
 18 obviously, we couldn't just make a unilateral decision
 19 to do this, we needed higher-ranking officers to agree
 20 with what we were doing and that's what we were doing at
 21 that point.
 22 Q. We've already dealt with how the operational Talk
 23 Group 1, 2 and 3 would be tested weekly. And you
 24 indicate that you and Ms Hoyte with Chief Inspector
 25 Booth were indicating that in addition the tactical

186

1 commanders' Talk Group should also fall subject to that
 2 testing regime.
 3 A. Absolutely, yes.
 4 Q. Just to be clear, up until that point that didn't have
 5 the weekly Sunday test?
 6 A. No.
 7 Q. So what was the reasoning for adding the testing of the
 8 tactical commanders' Talk Group?
 9 A. So that people knew it was there and become familiar
 10 with its use.
 11 Q. In terms of having arrived at that as a position, did
 12 you then need to make the check first of all that the
 13 control rooms of North West Fire Control and NWSA could
 14 use that system in the control room?
 15 A. Yes, I thought it was very important that we did that
 16 because although I'm really clear on how many radio
 17 operators Greater Manchester Police have and the set-up
 18 within our control rooms, I was less certain of the
 19 set-up between the NWSA control room and North West Fire
 20 Control, and particularly North West Fire Control
 21 because I was aware that they managed the communications
 22 for more than one police force area. So I wanted to go
 23 along and introduce myself, or ourselves, to the manager
 24 of the North West Fire Control room and check that,
 25 number 1, they could get that Talk Group within their

187

1 radio dispatch terminal, ICCS if you like, for another
 2 word, and I knew it was already in the handheld radios
 3 but what I didn't know is did they -- would they monitor
 4 it on the handheld, would they monitor it on their
 5 dispatch system, did they even have enough staff for us
 6 to make that request, because I am aware that they have
 7 nowhere near the amount of staff the police have in
 8 their control room. So I felt it was good practice and,
 9 you know, common courtesy to go along and ask them would
 10 they do this and we did that to North West Fire Control
 11 and North West Ambulance Service on the same day.
 12 Q. In terms of the discussions that were taking place with
 13 North West Fire Control, were they also taking place
 14 with Greater Manchester Fire and Rescue Service?
 15 A. Yes.
 16 Q. And also with NWSA, were they also supportive of this
 17 work that was taking place?
 18 A. Yes, they appeared to be. There didn't seem to be any
 19 resistance to it and they were very supportive.
 20 Q. We can see from the documents and from your statement
 21 that arrangements were made to attend on 10 April 2017.
 22 A. Yes.
 23 Q. And I think it was actually some time before though that
 24 that was set up on 16 March.
 25 A. Yes. I think that period of time between that was

188

1 because it was the Easter Holidays and I certainly had
 2 some leave, annual leave, and I think Jo did as well,
 3 although not necessarily at the same time.
 4 Q. I appreciate there's leave, but during the period of
 5 leave we know that there was a further attack that took
 6 place in Westminster during that time. When that attack
 7 took place, bearing in mind the work you were doing, did
 8 that highlight even more the need to progress --
 9 A. Yes.
 10 Q. -- this as a matter of urgency --
 11 A. Yes.
 12 Q. -- so that there was no ambiguity between the
 13 tri-service as to what was the policy and procedure --
 14 A. Yes.
 15 Q. -- in the event of a major incident --
 16 A. Yes.
 17 Q. -- or a major incident that was an MTFA?
 18 A. Yes.
 19 Q. We can see that you then reference the email from
 20 Sergeant Whittle on 30 March. Perhaps if we could
 21 please display that email, Mr Lopez. It's
 22 {INQ017994/6}.
 23 So we can see Mr Whittle to yourself, Jo Hoyte,
 24 Michael Booth, cc-ing in Simon Lear and Sarah Grimshaw
 25 at 9 o'clock on 30 March setting out:

189

1 "Recent command training session around JESIP
 2 working has identified our need to switch to the use of
 3 Airwaves channel..."
 4 And that's the tactical commander's channel, isn't
 5 it?
 6 A. Yes.
 7 Q. "... for our three-way JESIP communications link
 8 Greater Manchester Fire and Rescue Service and NWAS.
 9 "Currently... in place and working well.
 10 Is the operational commanders?
 11 A. Yes.
 12 Q. So this email is acknowledging that there was already
 13 the operational commanders' Airwave that worked well.
 14 But Mr Whittle goes on:
 15 "I have met with commanders from NWAS, Simon Watson,
 16 and GMFRS, Neil Gaskell, and agreed a switchover date of
 17 Sunday, 30 April 2017 with a test to be conducted by the
 18 duty FDO on that morning. Can you please advise of any
 19 further works required to be carried out between now and
 20 then to facilitate this change?"
 21 Had you had a discussion with Mr Whittle as to why
 22 it had been identified for 30 April?
 23 A. No. No.
 24 Q. Because we know at the time, when this email would have
 25 been sent by Mr Whittle, it would have been after the

190

1 Westminster attack.
 2 A. Yes.
 3 Q. Would that have featured in his mind, do you think, for
 4 the --
 5 A. I can't say. That was the first time --
 6 SIR JOHN SAUNDERS: That's all right, you don't need to
 7 speculate --
 8 A. -- I'd seen that date.
 9 MS CARTWRIGHT: We can then see -- if we move, Mr Lopez, to
 10 {INQ017994/5} -- you confirmed that you and Jo were to
 11 attend the control room on 10 April to test that they
 12 have access to the tactical commanders' command and
 13 control systems:
 14 "This is in case of a three-way link being required
 15 between the control rooms and is as discussed at the
 16 last JESIP MTFA exercise held at the GMFRS training
 17 centre. We will report back on this after the visit.
 18 The suggestion was that in the instances of an MTFA
 19 incident happening, then this would be the preferred
 20 method of communication between the control rooms as
 21 a way of providing all three services with up-to-date
 22 information until the TCG/force Silver can be
 23 established. Hope this makes sense."
 24 Again I think it's right, isn't it, that that
 25 meeting of the two control rooms went well?

191

1 A. Yes, it did.
 2 Q. And it clarified that the tactical commanders' Talk
 3 Group could work for the communication between the three
 4 control rooms?
 5 A. Yes, that's correct.
 6 Q. And was confirmation also given at that time that both
 7 NWAS and Greater Manchester Fire and Rescue Service
 8 through North West Fire Control would monitor that
 9 control room all the time, effectively?
 10 A. Yes, they did. We hadn't sort of said go because
 11 I wanted to take it back, confirm that we'd done the
 12 successful visit, and seek guidance as to what date they
 13 would like us to change over.
 14 Q. So the start, we can see, of the chain was wanting it to
 15 be effected by 30 April and you have had a successful
 16 visit on 10 April to both control rooms. What was it
 17 that was making 30 April not achievable as the date --
 18 A. I think it was the creation of this stop(?) and making
 19 it into a document and in amongst all the other work
 20 we were doing because this wasn't -- unfortunately, this
 21 wasn't the sole focus of our job, both Jo and I have
 22 really busy other jobs, and we were wanting to give it
 23 priority but I think it was just that we were going
 24 through the process of trying to fit in the work with
 25 our other work and always in the back of our mind we had

192

1 the thought that was there was a Talk Group available to
 2 be used albeit via a phone call. It wasn't as
 3 if we didn't have anything; it was just formalising it.
 4 SIR JOHN SAUNDERS: Remind me what a SOP stands for?
 5 A. Standard operating procedure. Just basically the
 6 agreement.
 7 SIR JOHN SAUNDERS: No, sorry, I just forget these
 8 occasionally.
 9 MS CARTWRIGHT: We can then see that there was a chaser in
 10 respect of where the work was up to and perhaps
 11 Mr Lopez, if you could display {INQ018039/2}, please.
 12 We can see here there's an email, in fact you're
 13 copied into it, with Cally Fillingham from the College
 14 of Policing.
 15 A. Yes.
 16 Q. We see above it, I think this was a chaser for the
 17 tactical advisers -- could you go back, Mr Lopez, please
 18 -- where they'd been wanting to see the tactical
 19 advisers' paper that had been indicated was going to be
 20 provided in respect of Airwaves for the Operation Plato.
 21 A. Yes.
 22 Q. And if we go, please, to {INQ018039/1}. We can see on
 23 20 April, Jo provides detail to Cally Fillingham in
 24 respect of the change to the Greater Manchester firearms
 25 national Airwave --

193

1 A. Yes.
 2 Q. The first change.
 3 A. Yes.
 4 Q. Then secondly, about the work that was being done on
 5 the JESIP.
 6 A. Yes.
 7 Q. So we can see Jo Hoyte is giving her apologies for not
 8 having provided the TA Airwaves document due to leave.
 9 And I'm not going to deal with the work to the national
 10 firearms Airwave because we know that was used on the
 11 night. But we can see in the bottom paragraph, it's set
 12 out:
 13 "Laura and I have already carried some work with
 14 JESIP partners (North West Ambulance Service arena
 15 Greater Manchester Fire and Rescue Service) in relation
 16 to the use of the tactical commanders' Airwave in the
 17 event of a major incident. We recently visited their
 18 control rooms and carried out some tests/checked their
 19 ICCS terminals. We're hoping to set up a protocol
 20 standard operating procedure whereby each control room
 21 automatically monitors [that Airwave] and use this as an
 22 initial means of communication between the three
 23 agencies as a matter of course, as outlined in the JESIP
 24 principles. I can let you have a copy of this already
 25 if you like once complete."

194

1 Why was Cally Fillingham in particular wanting to
 2 see the product of that TA --
 3 A. Sorry.
 4 Q. -- Airwave document that had been indicated was being
 5 drafted?
 6 A. Cally Fillingham is the manager of the training for
 7 Airwave tactical advisers, so obviously she trains us
 8 all. She makes sure that we do everything standard and
 9 I think she was interested to include it into the
 10 training if it was usable and good.
 11 Q. We can see you were copied into that email but it's
 12 right, isn't it, there was a further chaser on the same
 13 day from David Whittle?
 14 A. Yes.
 15 Q. {INQ017994/4}, please.
 16 We can see at 2.33 on 20 April, from David Whittle
 17 to yourself, cc-ing Jo Hoyte:
 18 "Hello Laura. How did it go on the 10th? Can you
 19 please advise on the steps we need to take to make this
 20 changeover happen and do you think it's feasible for
 21 28 April? So should we hang on with the operational
 22 commanders' Talk Group in the meantime? I'm on leave
 23 after today for a week so could you please include
 24 Inspector Lear in any emails."
 25 After you'd done the visit on 10 April, why had

195

1 Mr Whittle not had an update of that visit because
 2 10 days had now passed and this email seems to suggest
 3 he'd heard nothing about the success or otherwise of
 4 that visit?
 5 A. I really don't know. I think Jo was on leave, I was
 6 busy with lots of other things, and I think we'd left it
 7 with Chief Inspector Booth to ratify, really.
 8 Q. Then could we please look, Mr Lopez, at {INQ017995/1}.
 9 We can see your response to Jo Hoyte at 14.34 on
 10 20 April:
 11 "Hi Jo, what did we decide to do about this? I've
 12 had that time off and forgot."
 13 Then we see that Jo Hoyte responds at 3.06:
 14 "I was going to ask you the same thing. If
 15 I remember rightly, I'm going to create a template for
 16 fire and ambulance to complete with the shortcuts/speed
 17 dials for the different Talk Groups. We're going to
 18 write a protocol and I just need to remind myself what
 19 we said we'd do if they can't get hold of each other.
 20 I think we said fire and ambulance can shout up on..."
 21 Is that the Hailing group?
 22 A. Multi-agency Hailing group, yes.
 23 Q. "But our FDO would have to ring fire and ambulance
 24 direct as we don't have their Hailing Talk Groups."
 25 A. Yes.

196

1 Q. "Do you want me to reply to Dave Whittle?"
 2 And I think you're then to speak to Mike Booth?
 3 A. He.
 4 Q. Again those emails exchanges from yourself and Jo Hoyte
 5 seem to suggest that this had slipped in terms of
 6 priority .
 7 A. I wouldn't say it slipped in terms of priority . I think
 8 we'd been really busy, I'd had a week's leave, and it
 9 was just bringing ourselves back up to speed with stuff,
 10 really , and there was an awful lot of work going on, if
 11 I remember rightly at the time, and I know I said it
 12 before, but there still was a method of communication.
 13 It wasn't as if there wasn't anything in place.
 14 Q. I think we can see that, on the following day, Jo Hoyte
 15 replied and explained that:
 16 "The visits to NWS and North West Fire Control had
 17 gone well and both control rooms [were] able to access
 18 the multi-agency tactical Talk Group using their
 19 communication equipment."
 20 And she also explained about that template. We can
 21 see that, I think you then -- it's {INQ017994/2},
 22 Mr Lopez.
 23 That's the email at 7.25 on 21 April 2017. We can
 24 see it gives a summary about where things have got to,
 25 but concludes:

197

1 "All things considered, I think that 28 April might
 2 be a bit ambitious, but we are on with it. I'm thinking
 3 that around the middle of May might be a bit more
 4 realistic due to current workload and a four-day course
 5 which I need to attend. I hope that's okay."
 6 And we can see that Mr Whittle responds,
 7 cancelling -- indicating that he will cancel 28 April
 8 and make the switch:
 9 "... when you say it's ready."
 10 So what discussions had you and Jo Hoyte had about
 11 meeting the timetable of middle of May to effectively
 12 have that implemented?
 13 A. I think obviously I had my leave at the beginning of
 14 April, Jo had hers up to the 21st when she came back in,
 15 and we looked at both of our workloads and decided that
 16 was a better time, or that was a more achievable time
 17 for us to finish everything off. I think we were
 18 concerned that we wanted to produce a finished article
 19 rather than leave any part of it unfinished, so there
 20 was no ambiguity.
 21 Q. In fact, I think it was on the day of the attack itself
 22 where the draft document was --
 23 A. It was, yes.
 24 Q. -- provided. So it wasn't a case that the switch had
 25 occurred on the middle of May. In fact, the draft SOP

198

1 was only circulated on 22 May itself?
 2 A. Yes, that's right.
 3 Q. Perhaps Mr Lopez, if we could display, please,
 4 {INQ017971/1}.
 5 We see that at 1.44, Jo Hoyte provides the draft
 6 multi-agency interoperability testing draft document to
 7 you. Had she been the sole author or had you
 8 collaborated in the creation of the document?
 9 A. She probably authored it and then I contributed to
 10 looking through it and making sure we were factually
 11 correct.
 12 I think from this email, if I can help, what we were
 13 proposing was a further consolidation of the testing.
 14 Rather than leaving it at the airport, only testing the
 15 multi-agency operational Talk Groups, we were going to
 16 incorporate the tactical multi-agency Talk Group into it
 17 and bring it back into the OCB, so it was more
 18 meaningful and used more people to be involved in that
 19 training, so that more commanders had exposure to it.
 20 Q. Sorry, I'm not quite clear. In terms of where you'd got
 21 to with the draft, what were the discussions you'd had
 22 about what was then -- you envisaged would take place to
 23 bring this to fruition?
 24 A. We needed to go to the airport, because we mentioned
 25 Christine and Terry at the airport, to come up with

199

1 a new testing regime. So in order -- also with the
 2 control rooms, for the control room Talk Group being in
 3 place, we wanted to bring the testing of the Talk Groups
 4 back into the OCB to make it more rounded and more
 5 complete.
 6 Q. We can see at {INQ017970/1}, just looking at the first
 7 page, bearing in mind part of the work or identification
 8 for this SOP came from Hawk River, we saw from the
 9 recommendations that one of the issues that had been
 10 identified was:
 11 "... which include also partners such as British
 12 Transport Police."
 13 Is there a reason why BTP weren't included in this
 14 draft SOP as one of the individuals to which it was
 15 envisaged the SOP would apply?
 16 A. No, there isn't a reason. I can't answer that, sorry,
 17 no.
 18 Q. Then we can see perhaps, if we move to {INQ017970/4},
 19 again the analysis that had been done around the various
 20 Talk Groups.
 21 Then perhaps if we could move to {INQ017970/8}.
 22 We can see there were then flow charts that were set out
 23 for testing of control room to control room testing.
 24 Then, over the page, please, {INQ017970/9}, phase 2
 25 for GMP force control room to operational commanders to

200

1 those Talk Groups.
 2 A. Yes.
 3 Q. What then --
 4 A. But that was the plan to bring it away from
 5 Manchester Airport and they were testing directly with
 6 the NIOs or the nominated person to bring it back into
 7 the operational control room and make it so that they
 8 were using commanders from every aspect of a service.
 9 Q. That can be taken down, thank you.
 10 So when the date had been envisaged for the middle
 11 of May, had there been any further discussions with
 12 Mr Whittle or Mr Booth or the other agencies that had
 13 had input? I think we can see emails from Mr Gaskell
 14 and from Janine Carden as well. Had anyone come back
 15 about where things were up to and how long it would be
 16 before this had been progressed?
 17 A. Not after 22 May.
 18 Q. Can I ask then, in terms of it being known between the
 19 partner blue light services, in your mind had the fact
 20 that this work was being done created any confusion then
 21 about what the system was that should be applicable,
 22 bearing in mind there had been a lot of discussion and
 23 in fact visits to control rooms to check it worked?
 24 A. I think in my mind we'd made it clear that we were
 25 visiting to do the test and that we would, once

201

1 ratified, give them a date that we would be going live
 2 with it. So if there was any confusion, I don't
 3 think -- hopefully we didn't cause it.
 4 Q. Could we move next then, please, to your involvement
 5 later on that day on 22 May. I think it's right that
 6 you worked all that day in the day job?
 7 A. Yes, I did.
 8 Q. And it was during the evening where you -- can I just be
 9 clear, did you receive a text or a call from Mr Randall?
 10 A. The first thing I got was a text and he said to me that
 11 there'd been an explosion at the arena. I texted back
 12 to say, "I think you'd better ring me, then I can get
 13 some more details". So then he rang me and explained
 14 what had happened. I said, "Right, I'm on my way, I'll
 15 go in". Because I knew that there would be
 16 a requirement for the Silver control to open because it
 17 was a larger room, a multi-agency room. I knew that the
 18 scale of the events would mean that I would need to be
 19 there because that's my responsibility. So as soon as
 20 he rang me, I got out of bed and I made my way there.
 21 SIR JOHN SAUNDERS: Could you just remind me who "he" is?
 22 A. Sorry, Ian Randall, the FDS.
 23 SIR JOHN SAUNDERS: Thank you.
 24 MS CARTWRIGHT: You indicated earlier on, when you dealt
 25 with what you'd do at the force command module, that in

202

1 reality it doesn't really need setting up.
 2 A. No.
 3 Q. So can you assist? We've heard some evidence that
 4 Mr Randall had to move from where he was and go to the
 5 force command module to set up the Silver control. Can
 6 you assist us to have a greater understanding about what
 7 needed to take place at the force command module?
 8 A. Yes. I think -- I've heard quite a lot of talk about
 9 setting up. I think it's more about getting the right
 10 personnel into the room and to the functions that
 11 we would need to operate a fully functioning Silver
 12 control. So as regards setting up, as I said to you
 13 before, part of my role is to ensure that that room is
 14 ready to go at all times, that the IT functions, that
 15 everything that's required to be working is working so
 16 that, basically, somebody can walk into that room and be
 17 ready to go as soon as possible. Ian Randall was
 18 brought in to act as communications supervisor for the
 19 group of communicators that came with him and he had
 20 quite a lot of knowledge of that.
 21 Q. When you were being called, were you being called to --
 22 asked to perform the role of a tactical Airwaves
 23 commander or in your role as the force command module
 24 manager?
 25 A. The latter, the force command module manager.

203

1 Q. When Mr Randall rang you, did you ask any questions
 2 about whether a tactical Airwaves --
 3 A. No, I didn't, sorry.
 4 Q. Would that be something that in the event of a situation
 5 like has been reported, it was important to know,
 6 bearing in mind you would discharge that role also, or
 7 you could discharge that role?
 8 A. I probably made the assumption that there was already
 9 one in place.
 10 Q. How do we get to that, can you --
 11 A. Because the FDO had a list of Airwave tactical advisers
 12 and they would have known if one had been on duty at the
 13 time.
 14 Q. It's right, isn't it, that you arrived at force
 15 headquarters by 11 o'clock?
 16 A. Yes.
 17 Q. And can you assist then as to what your role was when
 18 you arrived?
 19 A. To ensure that everything was available to everybody, to
 20 then start the turnout of people who would be required,
 21 not the communications staff but the other functions
 22 within the Silver and Gold control, so I had a contact
 23 list of people that I would ring and I started to work
 24 down that.
 25 Q. Is that ringing to get them to come into the --

204

1 A. Yes, it is, to carry out a function within the room.
 2 Q. Can you assist us as to what time then it was when you
 3 realised that there wasn't an Airwaves tactical adviser?
 4 A. When the communications staff arrived and we moved
 5 everybody on to the Silver control Talk Group, and
 6 I made sure that any partners had what they required.
 7 I then stopped and thought, "I'd better just check and
 8 have a look about Airwave", so that was when I turned my
 9 attention to that and picked up that role, if you like.
 10 Q. Can you give us some idea then as to when you
 11 effectively picked up that role?
 12 A. Probably at about 23.45/23.50.
 13 Q. In your second witness statement you set out at
 14 paragraph 7, {INQ035364/2}:
 15 "In my role as tactical adviser I am able to monitor
 16 Airwave network usage to ensure there are no issues and
 17 to take steps to manage the GMP Airwave structure in the
 18 most appropriate way to avoid any issues occurring.
 19 I do this by consulting a computer program supplied by
 20 Motorola Solutions Limited. This gives me details of
 21 Airwave sites, the number of Talk Group users, and how
 22 those users are affecting the network."
 23 A. Yes, that's correct.
 24 Q. So when you took on the role of tactical adviser, did
 25 you monitor that system?

205

1 A. I did, and I also made contact with the Airwave National
 2 Monitoring Centre.
 3 Q. And when you did that, did you identify that the
 4 multi-agency Airwave Talk Groups were not being used?
 5 A. That's not something that I would have discussed with
 6 them. They look at a higher level of operations on the
 7 network. So the usage of the Talk Groups is very much
 8 individually down to the forces; they're more looking at
 9 things like have: we got any queuing to get on to the
 10 network, are there too many Talk Groups in operation,
 11 are people using the telephony side of the radios, are
 12 they making point-to-point calls, and generally how the
 13 network and that aerial site that controls the area
 14 around the arena is operating. So they don't really
 15 look at the individual Talk Groups unless I specifically
 16 ask them to.
 17 Q. Can I ask, though, in terms of the work that you had
 18 been doing with Jo Hoyte and in terms of the discussions
 19 that had taken place, did you not think to check
 20 what was happening from a multi-agency use of the
 21 various Talk Groups, bearing in mind --
 22 A. I could do that myself, sorry.
 23 Q. And did you?
 24 A. Yes.
 25 Q. When did you do that?

206

1 A. At the time.
 2 Q. Did you yourself personally do it or did you task
 3 someone else?
 4 A. No, I did it.
 5 Q. Could you tell us about that, please?
 6 A. I went on to this computer program that is provided by
 7 Motorola Solutions and we have a data sharing agreement
 8 with the Fire and Ambulance so we can look at their
 9 data. I was initially concentrating on how the next
 10 level up was performing, the actual Airwaves site,
 11 because if that doesn't work, you know, multi-agency
 12 wouldn't work either. So I needed to ensure that
 13 we were managing that side of it properly and I then
 14 asked the Airwave Monitoring Centre to give me an idea
 15 of how the multi-agency use was going. They pointed out
 16 to me that NWAS -- and this is not a reflection on
 17 them -- they use Airwave in a completely different way
 18 to the police, they use a lot of point-to-point calls
 19 for their daily business, so they were doing their daily
 20 business and using a lot of point-to-point calls, which
 21 they identified to me, and I spoke to the NWAS NILO
 22 in the room and asked them to invoke their major
 23 incident procedure.
 24 Because what they should do, when they have a major
 25 incident like this, they should move on to Talk Groups

207

1 like the police use and not use point-to-point, and
 2 they'd identified to me at the National Monitoring
 3 Centre that there was a lot of point-to-point being made
 4 by NWAS, so that led me to think that they hadn't yet
 5 invoked their major incident procedure. So I just went
 6 across the room, spoke to the NWAS NILO, and asked him
 7 would they do that, and he did.
 8 Q. Did you at the same time as raising the fact that there
 9 had been a high usage of point-to-point by NWAS about
 10 what the position was about their major incident, what
 11 their understanding was, bearing in mind the traffic you
 12 could see didn't suggest that there'd been a major
 13 incident?
 14 A. Well, I assumed they already knew what it was because
 15 they were there in the room working alongside us, so
 16 I didn't really need to ask them that. I just thought
 17 that they'd perhaps not realised that -- you see, the
 18 issue with it is -- sorry I'll finish that in
 19 a minute -- is that Airwave site also covers everybody
 20 else in Manchester, in the Manchester area, so if there
 21 was an ambulance dealing with a patient somewhere close
 22 by, but not directly involved with the arena, and they
 23 were using point-to-point, that would still go to the
 24 same Airwave site and would still have the same impact
 25 upon us. It's not a separate thing. So any police

208

1 officers out and around who were doing point-to-point
 2 but not directly involved at the arena would have the
 3 same impact. Does that sort of make sense?
 4 Q. It does. So is what you had viewed on looking at the
 5 Motorola system that the usage that was being done by
 6 NWSA personnel was causing an impact to how the system
 7 operated and --
 8 A. It wasn't at that time.
 9 Q. -- slowing it down?
 10 A. Sorry, I'm really sorry, I keep interrupting you.
 11 Q. So it wasn't at that time?
 12 A. But it could have had the potential, so I wanted them to
 13 invoke their emergency procedures and go back to using
 14 it how -- as the police would use it, as a Talk Group.
 15 Q. Can I then deal with the -- would you as part of your
 16 role as a tactical adviser want to look at whether there
 17 had been any requests in respect of Airwave, so how
 18 efficiently the Airwave Talk Groups were being used on
 19 the night?
 20 A. I was trained to look at the information coming from off
 21 the Motorola system to understand what the impact was.
 22 Q. So had you been made aware of any individuals from NWSA
 23 that had requested access to multi-agency interoperable
 24 Airwaves?
 25 A. It wouldn't have gone through Airwave, they would have

209

1 spoken to an Airwave tactical adviser, maybe in the
 2 wrong service, and that Airwave tactical adviser
 3 would -- if it had been me, I would have tried to have
 4 made contact with an Airwave tactical adviser through
 5 NWSA and asked them about it.
 6 SIR JOHN SAUNDERS: An Airwaves tactical adviser sounds to
 7 me like you're giving advice to somebody.
 8 A. Yes.
 9 SIR JOHN SAUNDERS: Were you advising anybody?
 10 A. On that night, more than -- yes, I was. I was looking
 11 at the system and making sure I gave the advice to NWSA
 12 about their use of point-to-point and how it could
 13 impact, so, yes, I would say I was giving advice.
 14 SIR JOHN SAUNDERS: Were you advising any of the GMP
 15 commanders such as Gold and Silver?
 16 A. If I'd been asked about it, yes, I would.
 17 SIR JOHN SAUNDERS: Were you asked about it?
 18 A. The only person that I attempted to speak to was
 19 Chief Inspector Dexter, who said he was having problems
 20 with his radio, but that conversation never concluded
 21 because --
 22 SIR JOHN SAUNDERS: We understand what was the problem.
 23 A. Yes, so that was another piece of advice I could have
 24 given to him, had we concluded the conversation.
 25 MS CARTWRIGHT: Can I finish today, and I'll come on to deal

210

1 with the Dexter call and the other calls you had,
 2 hopefully in quite short order tomorrow. Can you assist
 3 us in terms of something we see in the major incident
 4 FWIN for Greater Manchester Police? And I apologise it
 5 wasn't in your evidence proposal, but it is a document
 6 I showed you before coming into court to see with the
 7 knowledge and experience you have about Airwaves if you
 8 can assist us with something that's recorded on that
 9 FWIN, please.
 10 It's {INQ007214/29}, please, Mr Lopez. It's the
 11 entry for 23.38, please, if that can be expanded. Maybe
 12 just move up a little, please.
 13 There's a reference at 23.38 to:
 14 "Matt is saying if officers change the radio
 15 channels to ..."
 16 And you're aware of what channel that is?
 17 A. Yes.
 18 Q. "... then they can patch GMP and BTP on one channel."
 19 A. The Talk Group they're referring to is a Talk Group that
 20 could have happened on, but it's essentially reserved --
 21 one of the main uses of it is for pursuits, so that
 22 wouldn't be our first choice of Talk Group to use, it's
 23 used within the operational control rooms by the team 3
 24 operators to deal with any pursuits that happen in the
 25 whole of the Greater Manchester area. So I don't know

211

1 who Matt is, but that wouldn't be a piece of advice that
 2 I would have given.
 3 Q. What does "patching on" mean?
 4 A. I think they've used it in the wrong context here
 5 because there's no patching to be done. Both GMP and
 6 BTP have access to that Talk Group within their radios.
 7 What they mean by patching is if you've got officers on
 8 one Talk Group and officers on another Talk Group and
 9 you want to join them together. You just wouldn't do
 10 that, not with BTP because of the way they operate.
 11 Q. Would this be the sort of thing where a tactical
 12 Airwaves adviser could give advice about --
 13 A. Absolutely, yes.
 14 Q. -- that sort of thing? And do you know, at any point,
 15 did anyone ask you about that?
 16 A. No.
 17 Q. And had someone asked you about that, would that have
 18 flagged that there was an issue where other services,
 19 here BTP, were having an issue in getting through to
 20 those they needed to be in contact with at GMP?
 21 A. Yes, because my understanding of BTP is that the
 22 officers who work within the Manchester region, and
 23 I don't just mean Manchester, the north-west region,
 24 have the primary Talk Groups of all GMP districts in
 25 their radios, so I assumed that they could make contact

212

1 via that method.
 2 SIR JOHN SAUNDERS: Okay, on a practical basis again we've
 3 got BTP officers, we've got GMP officers, all working
 4 actively at the arena.
 5 A. Yes.
 6 SIR JOHN SAUNDERS: It'd be really useful if they could talk
 7 to each other.
 8 A. Yes.
 9 SIR JOHN SAUNDERS: How can that work?
 10 A. The BTP officers have the Talk Group that we've referred
 11 to as the city centre Talk Group in their radios and
 12 they could have just simply switched on to that and used
 13 it.
 14 SIR JOHN SAUNDERS: So they'd need an instruction from
 15 above, presumably: now all switch on to that radio
 16 group?
 17 A. Yes. BTP work regularly in the GMP area and
 18 occasionally they may want something from GMP and apart
 19 from the obviously police Hailing Talk Group, they have
 20 each district has a primary Talk Group in their radio.
 21 So if they were work at Oldham or Rochdale they could go
 22 to the Talk Group and speak directly to the radio
 23 operator that's controlling that area.
 24 SIR JOHN SAUNDERS: Thank you.
 25 MS CARTWRIGHT: Perhaps just to finish with this document at

213

1 {INQ007214/36} of the same document, Mr Lopez. It's the
 2 entry at 00.16 in about the middle of the page.
 3 It says:
 4 "Open call for officers to move to..."
 5 And then an Airwave is given:
 6 "... re this incident."
 7 Is that what we discussed earlier where it's the
 8 move from the Manchester city centre to the Silver
 9 Airwave?
 10 A. Yes, that's correct.
 11 Q. So that's at 00.16?
 12 A. Yes.
 13 MS CARTWRIGHT: Sir, we have to conclude today at 4, so
 14 please could we end matters here today and we'll
 15 reconvene tomorrow?
 16 SIR JOHN SAUNDERS: How much longer do you think you have?
 17 MS CARTWRIGHT: I just have a few entries more in respect of
 18 the events of 22 May and then there's the final topic in
 19 terms of what happened after 22 May in terms of the work
 20 around the tri-service communications and what happened
 21 thereafter.
 22 SIR JOHN SAUNDERS: There's quite a lot of questioning from
 23 CPs; is that right?
 24 MS CARTWRIGHT: There is, sir.
 25 SIR JOHN SAUNDERS: Okay.

214

1 MS CARTWRIGHT: If we could adjourn until 9.30 tomorrow.
 2 Thank you, sir.
 3 (3.58 pm)
 4 (The inquiry adjourned until 9.30 am
 5 on Tuesday, 25 May 2021)
 6
 7
 8
 9

8
9

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

215

I N D E X

1
 2
 3 MR CRAIG THOMPSON (sworn)1
 4 Questions from MR GREANEY1
 5 Questions from MR ATKINSON76
 6 Questions from MR HORWELL103
 7
 8 MRS LAURA LEWIS (sworn)114
 9 Questions from MS CARTWRIGHT114

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

216

217