

# OPUS2

Manchester Arena Inquiry

Day 127

July 5, 2021

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1 Monday, 5 July 2021  
 2 (9.30 am)  
 3 (Delay in proceedings)  
 4 (9.39 am)  
 5 MR MICK LAWLOR (continued)  
 6 Questions from MR COOPER (continued)  
 7 SIR JOHN SAUNDERS: Mr Greaney.  
 8 MR GREANEY: Sir, good morning. As will be apparent to you,  
 9 I am in court, not Ms Cartwright. That is only because  
 10 once Mr Lawlor has finished his evidence, we intend to  
 11 proceed almost straightaway with ACC Hankinson. So I'll  
 12 ask Mr Cooper to continue with his questions.  
 13 MR COOPER: Thank you.  
 14 Mr Lawlor, let me please, and if Mr Lopez can  
 15 assist, put your first statement on screen.  
 16 {INQ026735/14}. Paragraph 66, please, Mr Lopez.  
 17 You say this:  
 18 "When I saw the message, I tried to phone Station  
 19 Manager Berry, who I knew was the duty NILO, but I could  
 20 not get through to him."  
 21 A simple question: what was the problem, was the  
 22 line engaged? Was it ringing out? Why couldn't you get  
 23 through to the duty NILO?  
 24 A. Sir, I would imagine one of those issues, engaged,  
 25 probably on the phone.

1

1 Q. Was this when he was no doubt travelling on the way into  
 2 Manchester?  
 3 A. I would imagine the timings or -- yes, anywhere between  
 4 23.15, 23.30, I would imagine Andy would have been  
 5 travelling at that time.  
 6 Q. So it's perhaps a logical deduction to assume that you  
 7 were one of the people who was trying to contact  
 8 Mr Berry when he was effectively lost?  
 9 A. In fairness, I wouldn't know where Andy's position would  
 10 have been at that time, whether he was travelling,  
 11 whether he was at the scene. I was just calling him to  
 12 get a situational awareness.  
 13 Q. That was what I was going to ask you next. You were  
 14 calling him to get situational awareness which, as  
 15 we have learned as time as gone in this inquiry, is  
 16 vital, isn't it?  
 17 A. For me and just kind of being made aware of an incident  
 18 it was just trying to get some information. So yes,  
 19 vital, yes, all calls in terms of --  
 20 Q. I think you're rather underplaying it, if I may put to  
 21 you. Situational awareness was vital, wasn't it?  
 22 A. Absolutely.  
 23 Q. Yes, thank you. We're there. Paragraph 67:  
 24 "I spoke to Fletcher and Keelan via mobile  
 25 telephone. We agreed between us that Fletcher would go

2

1 to the command support room at GMFRS HQ to provide  
 2 tactical advice and I would go to the multi-agency  
 3 command room at GMP. This was because I mainly worked  
 4 at GMP headquarters and I knew it would be deal with the  
 5 incident. I knew that I could assist from there  
 6 although I did not envisage that I would end up being  
 7 the only source of information."  
 8 "Although I did not envisage that I would end up  
 9 being the only source of information."  
 10 What did you mean by that?  
 11 A. I think it's fair to say that before I became involved  
 12 there would have been mobilisation of resources and  
 13 officers to this type of incident. It wasn't my  
 14 expectation that or understanding that those responding,  
 15 or not, were having difficulties in communicating with,  
 16 I suppose, each other or partner agencies. My thought  
 17 would have been information would have been being shared  
 18 between agencies.  
 19 Q. So you being the only source of information, what source  
 20 of information then were you supplying?  
 21 A. Supplying or -- sorry?  
 22 Q. You say you were the only source of information;  
 23 what was that information that you were the source of?  
 24 A. That would have been at the time when I arrived at the  
 25 multi-agency force command module, initially that would

3

1 have been the Op Plato information.  
 2 Q. The information that perhaps Mr Berry should have been  
 3 supplying?  
 4 A. I would like to have thought that would have happened  
 5 a long time ago.  
 6 Q. Yes. Are we saying here, and I'll keep drilling at it  
 7 until we get somewhere, if I may, the fact that you were  
 8 the only source of information -- who should have been  
 9 the source of information?  
 10 A. That should have been North West Fire Control and the  
 11 duty NILO on the night.  
 12 Q. Thank you.  
 13 Can I please go to {INQ030902/19}.  
 14 There we see -- I presume "Mick" is you; is that  
 15 right?  
 16 A. That would be fair to say.  
 17 Q. You say:  
 18 "There were a number of conversations between people  
 19 at GMP at 00.05. I arrived at GMP HQ and I was to relay  
 20 information of FS resources. I made my way up to  
 21 [blank] at police HQ."  
 22 And it's this:  
 23 "To say it was a busy room and there wasn't a lot of  
 24 people in there, it was confusing. I've gone over to  
 25 our FS command, set for me, and because I know quite

4

1 soon there will be [a round] the room for other  
 2 agencies."  
 3 What do you mean by to say:  
 4 "... it was a busy room and there wasn't a lot of  
 5 people in there, it was confusing?"  
 6 A. I think my understanding of that room --- or --- I, or we,  
 7 the Fire Service, we support a number of GMP operations.  
 8 Probably the word I'm using there, "busy", is just a ---  
 9 it feels a vibrant room whilst you're in there, but not  
 10 confusing, I suppose, if I used that terminology  
 11 (overspeaking). Yes, I've used the terminology  
 12 "confusing". I think probably my --- it was just when  
 13 I've --- and I don't know if this is part of a further  
 14 conversation, the document you've raised here, but it  
 15 was just maybe I was expecting more people in there than  
 16 what I envisaged. It just ... Probably the terminology,  
 17 "confusing", on reflection now, is probably the wrong  
 18 terminology.  
 19 Q. Well, what would you say should have been there instead  
 20 of "confusing"?  
 21 A. I would say it shouldn't be in there.  
 22 Q. Wait a minute, you're an intelligent man, you're an  
 23 experienced man. You said it. Why did you say it?  
 24 A. Sir, may I ask where the document is from?  
 25 SIR JOHN SAUNDERS: I think these are notes which are being

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1 taken, they're not transcripts as I understand it. Or  
 2 are they? I think they don't look like a transcript.  
 3 MR COOPER: I think they are not verbatim, as it were.  
 4 SIR JOHN SAUNDERS: They're notes of a debrief which is  
 5 taking place, so one hopes that whoever took the notes  
 6 got the essence of what you were saying. It is probably  
 7 likely, if my experience of taking notes is anything  
 8 like normal, that you probably did use the word  
 9 confusing and I think you're being asked: do you have  
 10 any idea now what you would have meant by confusing  
 11 at the time?  
 12 A. I can't put my finger on it to be honest with you, sir.  
 13 MR COOPER: Can I put my finger on it and suggest it's  
 14 because it was confusing?  
 15 A. I would disagree it was confusing.  
 16 Q. Right. So you're disagreeing with yourself?  
 17 A. It is probably a wrong choice of terminology.  
 18 SIR JOHN SAUNDERS: Okay, stop it.  
 19 MR COOPER: All right, I accept that, sir, I'm there.  
 20 SIR JOHN SAUNDERS: It's good for juries, not for me.  
 21 MR COOPER: I know, I know. It slips out sometimes, I'm  
 22 sorry.  
 23 Well, let's go a little back:  
 24 "To say it was a busy room and there wasn't a lot of  
 25 people in there."

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1 What does that mean?  
 2 A. I think if you just recall what I've just said a couple  
 3 of minutes ago, it's a vibrant room. When you walk into  
 4 that room you know there's activity. So busy,  
 5 vibrant ---  
 6 Q. All right.  
 7 A. --- activity.  
 8 Q. All right.  
 9 SIR JOHN SAUNDERS: It may be slightly confusing for you  
 10 because actually you'd gone along and you had not the  
 11 slightest idea what was happening with GMFRS and you're  
 12 there to supply information.  
 13 A. I had very little information when I arrived at the  
 14 command support room --- sorry, the force command module.  
 15 MR COOPER: Can I take you, please, on a different matter  
 16 now to just clarify some timings again, please, if  
 17 I can. Paragraph 81, please, of your statement, which  
 18 is the first statement, {INQ026735/17}:  
 19 "I recall that I was the first multi-agency partner  
 20 in the command suite. Shortly after, a representative  
 21 from NWS arrived followed by Julie Walker of the Civil  
 22 Contingencies Resilience Unit. Incidentally, she had  
 23 been informed (at approximately 23.00) that Plato had  
 24 been declared. This information became available post  
 25 the event."

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1 If I recall, you were informed of Plato at 00.15,  
 2 weren't you?  
 3 A. Approximately, yes.  
 4 Q. Can you give any explanation as to why this woman seems  
 5 to have been informed, from what you understood, at  
 6 11 o'clock, and you weren't informed until 00.15?  
 7 A. My understanding with that, sir, is that Julie was one  
 8 of the lucky ones who had the force duty officer's  
 9 number and was able to get through at that point and was  
 10 probably given the relevant information required. And  
 11 as we've heard evidence previously, none of the Fire and  
 12 Rescue Service personnel had that luxury, if you will,  
 13 of actually getting through to the force duty officer.  
 14 So it was just by chance.  
 15 SIR JOHN SAUNDERS: Can I just clarify? Did you speak to  
 16 her directly to get this information or did this come  
 17 through a couple of other hands?  
 18 A. No, I've spoken to Julie since, and I don't recall if it  
 19 was later on that evening --- sorry, or early morning, or  
 20 if it was on another occasion, but I've definitely had  
 21 a conversation with Julie who was providing me that  
 22 information.  
 23 SIR JOHN SAUNDERS: So she had told you she had got it at  
 24 11, but did she actually tell you she had spoken to the  
 25 FDO?

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1 A. Yes.  
 2 SIR JOHN SAUNDERS: Thank you.  
 3 MR COOPER: Thank you.  
 4 Before we move off your statement I just want to  
 5 clarify — your statements. I just want to clarify  
 6 something in your second statement, please,  
 7 {INQ039922/5}.  
 8 Mr Lopez, just to get the subject matter that I'm  
 9 dealing with here, could we go to paragraph 16, please?  
 10 I just want to top and tail this if I can with you  
 11 Mr Lawlor. Paragraph 16:  
 12 "The CLIO is a GMP internal information—sharing  
 13 system."  
 14 Was that available on the night of the 22nd?  
 15 A. In which location, sir?  
 16 Q. Well, in any location to assist in the...  
 17 A. So that would have been definitely available in the  
 18 force command module where I was located. I can't say  
 19 for definite if that was available in the command  
 20 support room due to historic issues with the computers  
 21 within the command support room.  
 22 Q. I'll try and deal with this shortly. If it had been  
 23 available in any or all of the facilities, would it have  
 24 been of assistance?  
 25 A. It would.

9

1 Q. And why wasn't it available?  
 2 SIR JOHN SAUNDERS: Historic problems with IT; is that  
 3 right?  
 4 A. Yes, that's fair to say. What I need to make clear is  
 5 I don't recall on this evening if the computers were  
 6 down or not functioning. They're Greater Manchester  
 7 Police's computers.  
 8 Q. All right —  
 9 SIR JOHN SAUNDERS: Mr Cooper, just so you know, I've had  
 10 some information this morning, which will need to be  
 11 checked for its accuracy, but insofar as Operation Plato  
 12 was on it, I gather it didn't go on until rather a later  
 13 stage. We'll check that for you and give you the  
 14 information.  
 15 MR COOPER: Thank you. Then I'll move on, save for a number  
 16 of paragraphs I was going to take you to, I'll only then  
 17 take you to paragraph 23, please.  
 18 It's somewhere earlier in the statement. What is  
 19 SCC?  
 20 A. Strategic coordination centre.  
 21 Q. Thank you:  
 22 "My understanding is that the SCC was not used on  
 23 the night of the attack and in fact I am not aware of it  
 24 ever having been used until 2020 when I believe it was  
 25 activated as a result of the COVID pandemic response."

10

1 It's just that paragraph caught my eye and I wanted  
 2 to ask you very simply: would that have helped on the  
 3 night, had it been used?  
 4 A. I think in terms of terminology, location, we perhaps  
 5 are bordering on sensitive information.  
 6 SIR JOHN SAUNDERS: The SCC is a GMP available space, it's  
 7 not GMFRS?  
 8 A. No.  
 9 SIR JOHN SAUNDERS: Although it may involve them going  
 10 there?  
 11 A. Yes.  
 12 SIR JOHN SAUNDERS: Thank you.  
 13 MR COOPER: Then I won't press you, I'm going to move on  
 14 then.  
 15 A number of documents we've been supplied with, and  
 16 I just want some clarification on what you say in them.  
 17 Mr Lopez, {INQ014593/3}.  
 18 These are your notes, Mr Lawlor. I'm just going to  
 19 ask you about just a couple of entries in there and you  
 20 put:  
 21 "POR. SRT stay at Central."  
 22 Were you rather surprised at that decision?  
 23 A. These are not my notes.  
 24 SIR JOHN SAUNDERS: Do you recognise the writing?  
 25 A. This was part of the evidence from or the additional

11

1 evidence from Neil Gaskell last week, was it?  
 2 SIR JOHN SAUNDERS: Do you know whose writing that is? Is  
 3 it Neil Gaskell's?  
 4 A. That's the additional statement.  
 5 SIR JOHN SAUNDERS: I'm just asking you: do you recognise  
 6 the writing?  
 7 A. I don't recognise the writing.  
 8 MR COOPER: I can move on then, sir.  
 9 SIR JOHN SAUNDERS: You don't recognise the writing and it's  
 10 not yours?  
 11 A. It's not mine, no.  
 12 MR COOPER: Let me take you, please, to the GMFRS notes of  
 13 a debrief, which was your first opportunity to comment,  
 14 which is {INQ000280/1}.  
 15 These are dated 18 October 2017. I can take you to  
 16 it, but I'll try and save some time by asking if you  
 17 remember. Do you remember saying that in relation to  
 18 Westminster Bridge and Plato, again in that instance  
 19 fire and ambulance were not informed of the declaration  
 20 of Operation Plato?  
 21 A. I understand what you're saying. Do you mind if I read  
 22 what...  
 23 Q. Of course you can. It's {INQ000280/2}, if it assists  
 24 you. I've got here "third paragraph from the bottom".  
 25 There it is, right at the bottom.

12

1 A. (Pause). Okay.  
 2 Q. Is that right?  
 3 A. My understanding at that incident is that at  
 4 Westminster Bridge there was similar issues in terms of  
 5 an early notification of the declaration of Op Plato.  
 6 Q. When you say "similar issues", what you say is:  
 7 "At Westminster Bridge Plato same fire and  
 8 ambulance, not informed; would have helped if this had  
 9 been shared."  
 10 My knowledge of Westminster Bridge isn't good  
 11 outside of reading newspapers, so if you can help me:  
 12 is that right from your information that:  
 13 "At Westminster Bridge Plato same fire and  
 14 ambulance, not informed"?  
 15 A. So the information I received and what I'm aware of is  
 16 at the early stages, when Op Plato was declared at  
 17 Westminster Bridge, that initially wasn't shared with  
 18 the other blue light agencies, so fire and ambulance,  
 19 and to a certain degree experienced similar issues to  
 20 GM Fire on that evening.  
 21 SIR JOHN SAUNDERS: Just stop. So that's your belief.  
 22 You've been told that by somebody. Mr Cooper, we will  
 23 check as to whether that is actually right or not.  
 24 MR COOPER: I don't know one way or the other.  
 25 SIR JOHN SAUNDERS: Just so we get the definitive answer.

13

1 That's what he believed in any event.  
 2 MR COOPER: Thank you.  
 3 Page 3, please {INQ000280/3}.  
 4 There's an observation made there, I'm asking you  
 5 whether you agree with it, right at the top, first line:  
 6 "Is there a tension between front line crews and  
 7 specialists? Yes, never known this service to be as  
 8 it is re morale. Every officer a target out there.  
 9 Crews just want to be out there saving lives, they don't  
 10 really understand."  
 11 Is there a tension so far as you're aware between  
 12 front line crews and specialists?  
 13 A. I would say there was at that time.  
 14 Q. What sort of tension?  
 15 A. My understanding at that time and my recollection was  
 16 individuals in specialist roles potentially were thought  
 17 of differently to let's say just normal, in inverted  
 18 commas, front line crews.  
 19 Q. Did this perhaps affect morale and culture, that's the  
 20 word I'm looking for? Did that affect the culture  
 21 in the Fire Service in Manchester at the time of this  
 22 atrocity?  
 23 A. I don't believe that.  
 24 Q. All right. I'll take you to the bottom part of that  
 25 stage:

14

1 "Comms to station afterwards..."  
 2 These are your words, I presume? When I say your  
 3 words, I'll correct myself: this is what you were saying  
 4 to the debrief, wasn't it?  
 5 A. This is the Kerslake --  
 6 Q. Yes:  
 7 "Comms to station afterwards was opportunity  
 8 missed."  
 9 What did you mean by that?  
 10 A. I think it was quite quickly realised that there was  
 11 issues on the night and as an organisation I don't think  
 12 we --  
 13 SIR JOHN SAUNDERS: Okay, this is going to see the ordinary  
 14 officers, if I can call them that, the ordinary  
 15 firefighters who were so frustrated with what happened  
 16 on the night and you're saying it wasn't dealt with very  
 17 well?  
 18 A. There was a missed opportunity in putting out a wider  
 19 understanding of the issues what occurred on that night.  
 20 MR COOPER: All right. That links in to the last question  
 21 in that case --  
 22 SIR JOHN SAUNDERS: Can I just follow up on that? This is  
 23 a more general question. So immediately after this had  
 24 all occurred, there was a considerable verbal attack by  
 25 the ordinary firefighters at management, senior officers

15

1 who ran the operation; is that right?  
 2 A. I think it's fair to say there was a lot of frustration.  
 3 SIR JOHN SAUNDERS: Do you think that led to a rather  
 4 defensive reaction by senior officers when looking at  
 5 what went wrong?  
 6 A. Sir, I don't believe we have been -- and if I put myself  
 7 in that category now, I don't believe we've been  
 8 defensive. I believe we've been open and honest with  
 9 the events afterwards. I don't believe that that side,  
 10 if you will, that side of the organisation has been able  
 11 to openly discuss with other members of the organisation  
 12 to put some clarity around exactly what did happen and  
 13 exactly what didn't happen.  
 14 SIR JOHN SAUNDERS: So we're talking about management not  
 15 being able to talk to firefighters to explain to them  
 16 what went wrong, what happened, and explain the actions  
 17 of those in charge?  
 18 A. Quite quickly there was instruction not to discuss the  
 19 incident because of potential ongoing investigations,  
 20 processes. So we as a -- and I don't like saying we --  
 21 as a cadre of people, we was discouraged not to discuss  
 22 the events of that evening.  
 23 SIR JOHN SAUNDERS: So you couldn't talk about it with  
 24 firefighters, which you hope would have stopped the sort  
 25 of divide which had occurred as a result of it?

16

1 A. Potentially. Equally, we was not encouraged to talk to  
2 each other, officers to officers.

3 SIR JOHN SAUNDERS: No. Is that all over now? Has the  
4 divide been cured, if you can cure a divide? I doubt if  
5 you can. Bridged is a better word.

6 A. There's a lot of work ongoing to try and bridge those  
7 gaps right across the organisation.

8 SIR JOHN SAUNDERS: Thank you.

9 MR COOPER: Because we heard, I think from you yourself,  
10 that there was an issue of trust and your evidence was,  
11 and it was ongoing. Is this an example of that ongoing  
12 trust issue you informed the chair of last week?

13 A. I would suggest -- I think we've been through  
14 a difficult period and we have got a long road ahead of  
15 us.

16 Q. One more document then please, as I anticipate it, it's  
17 {INQ022395/25}. Hopefully we can deal with it in short  
18 order.

19 These are the -- this is the GMFRS -- it's  
20 a presentation and I think you were part of this  
21 presentation, weren't you?

22 A. I produced the presentation.

23 Q. You produced it. There's a slide which encapsulates  
24 Kerslake. I won't go through every bullet point. As  
25 you prepared that slide, are you effectively accepting

17

1 or simply recording the criticisms in Kerslake?

2 A. Recording.

3 Q. Recording. Do you accept nonetheless what is on there  
4 as far as the criticisms in Kerslake are concerned?

5 A. My understanding and belief of the Kerslake Report to  
6 some degree is -- it's a flawed report. However, for  
7 the context of the overall presentation, that slide, if  
8 you will, was highlighting the negative and the  
9 reputation of Greater Manchester Fire and Rescue Service  
10 and the difficulties we faced and are facing and  
11 continually are facing.

12 SIR JOHN SAUNDERS: I'm really sorry, I missed a word you  
13 said. You qualified about the Kerslake Report. What  
14 did you say about it?

15 A. My belief, sir, and it's literally my belief, I believe  
16 the Kerslake Report is flawed.

17 SIR JOHN SAUNDERS: Flawed, okay.

18 MR COOPER: A final slide on {INQ022395/27}, please. When  
19 was this presentation? It was 25 -- it was March 2019,  
20 wasn't it? Is that right?

21 A. It could well have been.

22 Q. Yes, I think it was. There are the GMFRS  
23 recommendations update. Has all that been done? I'm  
24 asking the question in that form as I am simply  
25 conscious of time. Has all that been done?

18

1 A. Yes.

2 Q. Every single one of those is now implemented?

3 A. Yes.

4 Q. All right. Thank you.

5 You also recommended, didn't you, in another  
6 document that there be a full review of JESIP by the  
7 Home Office?

8 A. I can't recall which document, sir.

9 Q. I can take you to it. It's a debrief. {INQ004498/7}.  
10 Bullet point 4:  
11 "Recommendations. Full review of JESIP and MTFA  
12 JOPs [et cetera] by the Home Office."  
13 Are you aware whether such a full review was  
14 undertaken?

15 A. Sir, I can confirm the review of the MTFA JOPs was  
16 undertaken. That's the piece of work --

17 SIR JOHN SAUNDERS: That's why we've got a new JOPs?  
18 A. Yes, Neil Gaskell --

19 MR COOPER: What about the review into the other tools, do  
20 you know?

21 A. I wouldn't be able to confidently confirm one way or the  
22 other.

23 MR COOPER: All right. Sorry, sir, I've gone 5 minutes  
24 over, but those are my questions.

25 SIR JOHN SAUNDERS: Thank you very much for that.

19

1 Mr Greaney, just before you go on, the witness just  
2 said that he thinks the Kerslake conclusions are flawed.  
3 I'm not here to come into conflict or anything like that  
4 with Kerslake, but would it be a help, if it's not  
5 already set out, if we were to briefly do some sort of  
6 document later, just indicating in headline form where  
7 you think the conclusions are flawed?

8 MR GREANEY: Sir, that's one way of doing it.  
9 Alternatively, if the witness feels sufficiently  
10 comfortable, he could do so now, but I don't want to put  
11 him on the spot.

12 SIR JOHN SAUNDERS: No. Would you feel happy going away and  
13 writing it down or would you wish to do it now?

14 A. I don't mind either way, sir. I suppose if I go away,  
15 I've got more time to go away and have a proper think  
16 about it.

17 Just briefly, we know the contents of the  
18 Kerslake Report and yet we've heard witnesses throughout  
19 the period of the inquiry and there are a number of  
20 conflicts, just comparing exactly what it's saying  
21 in the Kerslake Report to exactly what we're hearing.  
22 But I'm willing to summarise that in --

23 SIR JOHN SAUNDERS: There are clearly some differences in  
24 evidence from the conclusions in Kerslake because we've  
25 heard different evidence. I think it may be better if

20

1 it is encapsulated in writing.  
 2 MR GREANEY: Sir, I didn't entirely understand Mr Lawlor's  
 3 answer, that is probably just me, but that probably  
 4 illustrates why your proposal should be followed and not  
 5 mine.  
 6 SIR JOHN SAUNDERS: I'm happy either way. Would you mind  
 7 doing that for us and we'll obviously circulate it?  
 8 Questions from MR GREANEY  
 9 MR GREANEY: The only question that remains is on behalf of  
 10 the Greater Manchester Combined Authority by Ms Johnson.  
 11 It's probably rather better if I just deal with one area  
 12 upon which I wish to ask questions before she does so.  
 13 Mr Lawlor, I'm going to ask you about one topic. It  
 14 takes you back to evidence you gave on Thursday last  
 15 week. I think, as you will appreciate, an issue has  
 16 arisen between you and your colleague, Neil Gaskell.  
 17 Are you aware of that?  
 18 A. Yes.  
 19 Q. All I want to do is to make sure that we've captured  
 20 your evidence about that issue entirely accurately. So  
 21 let's ensure that we do so.  
 22 Neil Gaskell gave evidence on 16 and 21 June, and  
 23 did you follow his evidence either by watching it or by  
 24 reviewing the transcript?  
 25 A. I watched parts of — the majority of Neil's evidence.

21

1 Q. So you'll be aware that on 16 June, he was asked  
 2 questions about the interaction on the night of the  
 3 attack between North West Fire Control and the  
 4 Greater Manchester Fire and Rescue Service just as  
 5 you have been asked about those communications. So that  
 6 was 16 June. Obviously, he covered other areas but  
 7 that's the one I want to draw to your attention. He  
 8 returned to give evidence on 21 June and, as we now  
 9 know, there was an exchange of texts and a telephone  
 10 discussion between the two of you on, I think, the night  
 11 of 20 June, so the night before he gave evidence. Have  
 12 I understood correctly?  
 13 A. Correct.  
 14 Q. We can put on the screen the exchanges that there were  
 15 between you. Mr Lopez, could we have, please,  
 16 {INQ100070/1}.  
 17 And thank you very much for drawing these materials  
 18 to our attention. We see at the top of the screen the  
 19 exchange of messages. On the night of the 20th in the  
 20 knowledge that Mr Gaskell was to return to resume his  
 21 evidence on the 21st, you said to him:  
 22 "Hope all goes well for tomorrow, Neil. You'll be  
 23 fine."  
 24 With a thumbs up and I'm not going to suggest that  
 25 that was anything other than an entirely supportive and

22

1 appropriate message. He replied:  
 2 "Cheers, mate. Are you up, Mick, for a very quick  
 3 question?"  
 4 And you plainly received that message very promptly  
 5 because you replied within the same minute, 22.19, with  
 6 a thumbs up. Am I right so far?  
 7 A. Yes.  
 8 Q. And then there was a telephone conversation between the  
 9 two of you, which lasted for 19 minutes, about which you  
 10 told us last Thursday?  
 11 A. Yes, sir.  
 12 Q. On 21 June, Mr Gaskell returned to resume his evidence.  
 13 I think I can say without being controversial that he  
 14 altered his position in relation to the communications  
 15 between NWFC and GMFRS. Are you aware of the evidence  
 16 that he gave in that regard on 21 June?  
 17 A. I am, sir. I wasn't following it live, but I'd seen it  
 18 later that day.  
 19 Q. And indeed it's clear from the evidence that you gave  
 20 last Thursday that you were aware of what he had said.  
 21 So can we just look at a couple of passages from what he  
 22 said and then I'm going to seek your evidence. Again  
 23 I'm not going to be pressing or challenging you, I just  
 24 want to secure your account of what passed between the  
 25 two of you.

23

1 Mr Lopez, this is Day 119 of the oral evidence  
 2 hearings, 21 June 2021. Could we have page 12 of the  
 3 transcript for that day? Thank you very much indeed.  
 4 I'm going to take you to line 14 {Day119/12:14}.  
 5 Mr Gaskell was drawing attention to the fact there that  
 6 he had not been notified of material that was to be  
 7 placed before him in his evidence. He said:  
 8 "What I will say is that there was no reference in  
 9 my evidence proposal that I was going to be asked  
 10 questions on the communications on 22 May between North  
 11 West Fire Control, between GMP, and between the duty  
 12 NILO and all the subsequent actions carried out by North  
 13 West Fire Control, which I felt put me at a significant  
 14 disadvantage on the questioning, sir."  
 15 And that was an observation directed to  
 16 Mr de la Poer.  
 17 Then he went on to say, as you will know:  
 18 "Subsequently, I've now looked at the — managed to  
 19 look at the transcript of the calls made into North West  
 20 Fire Control between the team leader and GMP and the  
 21 subsequent telephone calls between the North West Fire  
 22 Control team leader and the duty NILO, so I feel I'm in  
 23 a better position to answer your questions..."  
 24 Do you see that?  
 25 A. Yes.

24

1 Q. So the point he was making was that he had been taken  
2 a little bit by surprise by the questions on the 16th  
3 and by now, 21 June, he had been given access to the  
4 transcripts and felt better informed to give an account.  
5 This issue was taken up by Mr Horwell on behalf of  
6 Greater Manchester Police for perfectly understandable  
7 reasons later on that day. So Mr Lopez, could we go,  
8 please, to page 27 of the transcript? At line 17  
9 {Day119/27:17} you see that Mr Horwell said this:  
10 "You've told the chairman that since you last gave  
11 evidence, some further evidence has been placed before  
12 you. Some further documents. How did that arise?"  
13 Mr Horwell was referring back to what we've just  
14 seen, namely Mr Gaskell saying:  
15 "I've been provided with transcripts."  
16 The answer that was given line 21 {Day119/27:21}  
17 was:  
18 "I requested that from a colleague. Without  
19 discussing my evidence."  
20 And just pausing for a moment, do you agree with me  
21 that it seems plain from that use of language that  
22 Mr Gaskell was aware that he was under an obligation not  
23 to discuss his evidence whilst he was part heard?  
24 A. Yes.  
25 Q. And you're nodding your head. Would you have been aware

25

1 also that you should not be discussing evidence with  
2 a witness who was part heard?  
3 A. Absolutely, sir.  
4 Q. "Without discussing my evidence, I requested -- and  
5 I know he has done some work on that, on the early  
6 stages of the response to the incident, so I requested  
7 a transcript of the communication, sir."  
8 So he was referring to a discussion with a colleague  
9 who had done work on the early stages of the response;  
10 do you agree with me?  
11 A. Sir.  
12 Q. I'm just reading out his own words. And Mr Horwell then  
13 asked a typically fair question:  
14 "Question: Mr Gaskell, let me make it clear, I'm  
15 not suggesting anything untoward has happened. The  
16 colleague was?  
17 "Answer: That was a colleague of mine,  
18 Michael Lawlor."  
19 Obviously you:  
20 "Question: Thank you. What documents were you  
21 given, Mr Gaskell?  
22 "Answer: It's not an official document, sir. It's  
23 a document that has been prepared by Mr Lawlor, purely  
24 to be able to evaluate the initial response by GMFRS."  
25 And the chairman then intervened to suggest it was

26

1 a good idea that we obtained a copy of that.  
2 I have a series of questions, as you'll appreciate,  
3 Mr Lawlor, to ask you based upon that answer, and  
4 obviously you can't know what was in his mind and you  
5 can't answer for him. But you can help us with what is  
6 in your mind and what you did or didn't do.  
7 First, do you know to what document or documents  
8 Mr Gaskell is referring in that answer?  
9 A. No. I do now because it's been shown during the  
10 inquiry, but no, not at the time, no.  
11 Q. So now you know to what document he was referring. What  
12 document do you believe he was referring to?  
13 A. Sir, the timeline that was just put on the --  
14 SIR JOHN SAUNDERS: The one we've just seen?  
15 A. Yes.  
16 MR GREANEY: Do you agree with me that a natural reading --  
17 SIR JOHN SAUNDERS: Shall we get it up?  
18 MR GREANEY: Yes. I don't have the INQ immediately to hand.  
19 SIR JOHN SAUNDERS: Mr Cooper will because he just asked for  
20 it.  
21 MR COOPER: {INQ041593/1}.  
22 MR GREANEY: Thank you very much.  
23 Do you know now whose document this is?  
24 A. Yes, sir.  
25 Q. Whose document is it?

27

1 A. Neil Gaskell's.  
2 Q. A natural reading of what Mr Gaskell was saying was that  
3 he had been provided with a document which was not an  
4 official document but was a document that had been  
5 prepared by you. Had you prepared any such document?  
6 A. No, sir. The only documents I prepared in the past is  
7 the timeline, which we've seen, and the presentations.  
8 SIR JOHN SAUNDERS: Okay. Sorry, we'll hear from Mr Gaskell  
9 about it, but assuming you're right and this is written  
10 by him, it follows, I suppose it was taken down over the  
11 phone from you during the phone conversation?  
12 A. Sir, not in that detail. May I go back to the evening  
13 of the 20th then?  
14 SIR JOHN SAUNDERS: Sorry, I'm interrupting. Let's continue  
15 the questions. I absolutely -- anything you think  
16 you haven't had a chance to say, we will allow you to  
17 do. It's my fault, I should not have intervened.  
18 MR GREANEY: It's not your fault at all. Obviously,  
19 Mr Lawlor, I hope you're not feeling picked upon. This  
20 is something we are keen to get to the bottom of. I am  
21 going to give you a chance to tell us what you want to  
22 about the night of the 20th. Let me ask you a couple of  
23 direct questions first of all just to make sure your  
24 position remains as it was last Thursday.  
25 First of all, did you provide any document to

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1 Mr Gaskell?  
 2 A. No.  
 3 Q. So do you know what he was talking about when he gave  
 4 evidence on 21 June?  
 5 A. No.  
 6 Q. So insofar as Mr Gaskell's position is that the change  
 7 in his position between the 16th and the 21st was  
 8 attributable to any document that you gave to him, you  
 9 disagree?  
 10 A. Absolutely.  
 11 Q. To be fair to you, that was certainly your clearly  
 12 expressed position last Thursday. You wanted to tell us  
 13 more about what happened on the 20th, but let me just  
 14 observe this before you do so. The impression that one  
 15 may have gained from your evidence about the discussion  
 16 of the 20th, the 19-minute conversation, was that you  
 17 were certainly not in that discussion providing him with  
 18 the degree of detail that would have enabled him to  
 19 prepare this document.  
 20 A. Yes.  
 21 Q. Had I misunderstood?  
 22 A. That's...  
 23 Q. Have I accurately expressed your position?  
 24 A. Yes.  
 25 Q. Because if you had provided that degree of detail, that

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1 would not really have been honouring the principle that  
 2 we agreed upon earlier that witnesses should not discuss  
 3 their evidence when part heard. Against that  
 4 background, would you tell us what you'd like to add to  
 5 your evidence about 20 June?  
 6 A. I think it's just to, I suppose, assure and reassure  
 7 what I've -- the evidence I provided last week. You can  
 8 see it was a welfare text and I wasn't aware of the  
 9 question, you know, the type of question it was:  
 10 "Are you up for a quick question?"  
 11 Then a thumbs up. That could have been any  
 12 question. But Mr Gaskell, as he -- he'd highlighted  
 13 that he was having some difficulty in the clarity of the  
 14 timings and could I provide the timings in terms of what  
 15 happened. And it was quickly -- well, first of all what  
 16 I did say to Neil was that there's been a lot of  
 17 information been heard and is now on YouTube.  
 18 Q. Yes.  
 19 A. I'd expressed to him it's a bit late now to be starting  
 20 planning or preparing for your evidence in the morning,  
 21 but I did say: at 31 this happened, at 35 North West  
 22 Fire Control was made aware, at 40 the duty NILO was  
 23 contacted, 42 that call ended, at 48 the duty NILO  
 24 called back. It was literally a very quick synopsis of  
 25 the quick timings what I had in my mind. I did not in

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1 any way, shape or form go into any detail of those  
 2 timings and I do not understand why Neil gave that  
 3 evidence the day after in terms of me providing  
 4 a document.  
 5 SIR JOHN SAUNDERS: We can look into that with him. But  
 6 you've gone from the time of the explosion through to  
 7 10.48 in what you just told me now?  
 8 A. Yes.  
 9 SIR JOHN SAUNDERS: Is that what you did as far as you can  
 10 remember or did your timings go further than that?  
 11 A. No, it went as far as the duty NILO calling back at 48  
 12 to inform North West Fire Control that he was mobile to  
 13 the incident. That is literally the only information we  
 14 discussed about the timings. The rest of that call was  
 15 (overspeaking).  
 16 SIR JOHN SAUNDERS: These timings were off the top of your  
 17 head?  
 18 A. Sir, I've lived with this for 4 years.  
 19 SIR JOHN SAUNDERS: I'm not suggesting -- I'm just checking.  
 20 A. Yes. Definitely off the top of my head.  
 21 SIR JOHN SAUNDERS: I can forget things that I have lived  
 22 with for a long time very easily. Thank you.  
 23 MR GREANEY: As I promised you, we're not going to ask you  
 24 what was in Mr Gaskell's mind when he said all of this,  
 25 but we can be clear that your position is you gave him

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1 some very basic timings that were in your head and which  
 2 in any event had emerged in the course of the inquiry's  
 3 oral evidence hearings?  
 4 A. Yes.  
 5 Q. And you most certainly provided him with no documents?  
 6 A. I haven't provided any document.  
 7 MR GREANEY: That's as far as I propose to take it. We'll  
 8 explore the issue further with Mr Gaskell in due course.  
 9 SIR JOHN SAUNDERS: Thank you.  
 10 MR COOPER: Sir, I'm grateful for hearing that. Might  
 11 I suggest, subject to your discretion, sir, we have  
 12 a formal statement from Mr Gaskell on this issue? It is  
 13 potentially an important matter.  
 14 SIR JOHN SAUNDERS: That's what we intend to do, so  
 15 thank you as well for agreeing to that.  
 16 Mr Greaney, just help me. Most of us who are  
 17 advocates in this court are more familiar with processes  
 18 in criminal trials than we are with inquiries; that's  
 19 certainly true for me and maybe for a number of other  
 20 people.  
 21 MR GREANEY: It may well be, sir, yes.  
 22 SIR JOHN SAUNDERS: I know that, provided I remember, as  
 23 a judge in a criminal trial, when a witness goes part  
 24 heard I will always remind or tell the witness not to  
 25 discuss his evidence with anybody else. That doesn't

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1 happen in inquiries, and I certainly didn't do it with  
 2 Mr Gaskell when he went part heard, nor would I expect  
 3 to do so particularly unless someone tells me I ought  
 4 to. So the fact that the text was sent, there is  
 5 absolutely, as I see it, nothing wrong with that.  
 6 MR GREANEY: Sir, I hope in my questioning I made plain that  
 7 I don't think that was improper --  
 8 SIR JOHN SAUNDERS: Absolutely. I just want people to  
 9 understand because obviously we need to look more into  
 10 it, but there is a risk in going down a criminal route  
 11 in these things rather than what may be different in an  
 12 inquiry route.  
 13 Mr Gaskell, when asking for information, what  
 14 appears to be asking because he hadn't been warned  
 15 in the evidence proposal of those questions were going  
 16 to be asked beforehand otherwise no doubt he would have  
 17 made enquiries in whatever way beforehand.  
 18 MR GREANEY: Sir, I entirely understand your thought  
 19 processes. We do need to be careful not to make too  
 20 much of this. But there is, on the face of it,  
 21 a conflict and we ought to try to resolve it.  
 22 SIR JOHN SAUNDERS: Absolutely and we will. I just want  
 23 everybody to understand that the mere fact there is this  
 24 conversation does not of itself mean there was something  
 25 wrong going on.

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1 MR GREANEY: Mr Gaskell plainly thought that he had been  
 2 deprived of information that he needed and he wanted to  
 3 find it out. Whether it was the right thing to do to  
 4 seek it in that way is a different matter, but --  
 5 SIR JOHN SAUNDERS: What I might say at this stage is  
 6 it would seem, if nothing else for the avoidance of  
 7 doubt, that if anybody is in this position, they've gone  
 8 part heard, they've been asked questions which they  
 9 weren't expecting, that the proper route would be going  
 10 either to the inquiry team or to their own solicitors.  
 11 Doing it through that means provides a safety blanket to  
 12 everybody involved and is obviously a better way of  
 13 doing it.  
 14 MR GREANEY: It avoids this. I entirely agree with what  
 15 you've just said.  
 16 MR COOPER: May I add, in this particular situation, whether  
 17 Mr Lawlor, agin to protect him if nothing else, should  
 18 be directly warned -- warn is the wrong word -- advised  
 19 that he should not be speaking to Mr Gaskell,  
 20 particularly about this matter now, until it's resolved.  
 21 SIR JOHN SAUNDERS: Absolutely. I'm sure that's right.  
 22 Contacting your solicitor on a Sunday evening may not  
 23 always be the easiest thing to do, but no doubt they're  
 24 always available 24 hours a day, 7 days a week.  
 25 We will investigate it and I'm not suggesting

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1 anything different. I didn't want members of the public  
 2 listening to think to get what I think would be  
 3 a misunderstanding right from the start.  
 4 MR GREANEY: You're quite right, if I may say so, to make  
 5 that observation, sir. Thank you.  
 6 SIR JOHN SAUNDERS: Does any CP want to say anything about  
 7 that once I have said it? No? Okay, thank you.  
 8 I assume there is no general disagreement with what I  
 9 have --  
 10 MR GREANEY: I think that's the position, sir, yes.  
 11 Mr Lawlor, thank you for answering my questions so  
 12 directly.  
 13 There are some questions, just a small number of  
 14 questions, from Ms Johnson.  
 15 SIR JOHN SAUNDERS: Thank you, Ms Johnson.  
 16 Questions from MS JOHNSON  
 17 MS JOHNSON: Sir, there is just a short series of questions,  
 18 connected to two issues.  
 19 Going back to your evidence last week you were asked  
 20 some questions about whether you learned of the  
 21 declaration of Operation Plato and also some questions  
 22 about zoning, so those are the topics I'm going to  
 23 cover.  
 24 Taking the first of those, you were asked some  
 25 questions about when you learned of the declaration of

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1 Operation Plato from Chris Hill and then when you  
 2 learned of the time of that declaration. Do you  
 3 remember that?  
 4 A. Yes.  
 5 Q. You describe in your statement that when you received  
 6 those pieces of information, you communicated them over  
 7 the radio.  
 8 A. Yes.  
 9 Q. Is it your understanding that the information was  
 10 received as you communicated it in the command support  
 11 room?  
 12 A. Yes.  
 13 Q. I wanted to look at the command support room log. It's  
 14 {INQ004453/1}. If we look, please, at the entry  
 15 number 6, do you see there at 00.20, an entry by  
 16 Geoff Harris:  
 17 "Plato declared by GMP at 00.20."  
 18 A. Yes.  
 19 Q. If you then look up, please, to point 8, you see an  
 20 entry by Dean Nankivell at 00.49:  
 21 "Correction to point 6. Plato declared by GMP at  
 22 22.47."  
 23 A. Yes.  
 24 Q. Do those entries in the command support room log accord  
 25 broadly with the timings that you recollect you received

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1 those two pieces of information?  
 2 A. Yes. I think in point number 6, when I've communicated  
 3 the declaration of Plato at roughly 00.20, that would  
 4 have been Geoff Harris just capturing that information.  
 5 As we all know, around about that time, we thought it  
 6 may have just been declared but then some time later the  
 7 clarity was received from Greater Manchester Police that  
 8 it had actually been declared at 22.47 and that accords  
 9 with the timing there at 00.49.  
 10 Q. The second connected issue is when you were told about  
 11 the zoning at the arena. I'm going to ask you about  
 12 some of the evidence you gave last week, hoping not to  
 13 turn to a couple of documents, but if you need me to,  
 14 please do say.  
 15 In your statement, and I'll give the reference for  
 16 the transcript, {INQ026735/15} -- do you want to turn to  
 17 it? It's paragraphs 72 and 73 but I don't think we need  
 18 to put it up.  
 19 A. Yes.  
 20 Q. You deal with the first conversation you have with  
 21 Chris Hill at 00.15. Do you see that?  
 22 A. Yes.  
 23 Q. In paragraph 73 you say you think it's during that first  
 24 conversation that you learned about the zoning at the  
 25 arena.

1 A. Yes.  
 2 Q. Do you remember you were then asked some questions about  
 3 your handwritten notes?  
 4 A. Yes.  
 5 Q. And you queried whether in fact you learned about the  
 6 zoning some time later?  
 7 A. Yes.  
 8 Q. If we could look back, please, to the command support  
 9 room log, if we could have it back, please, Mr Lopez  
 10 {INQ004453/1}. Entry 9. Do you see at 00.53, there's  
 11 an entry by Geoff Harris:  
 12 "GMP declared curtilage inside the arena as a warm  
 13 zone, Victoria Station and surrounding area is a cold  
 14 zone"?  
 15 A. Yes.  
 16 Q. Does that entry fit with the revision that you made to  
 17 your evidence last week that perhaps you learnt about  
 18 the zoning later?  
 19 A. Yes, and I think if you take into account my handwritten  
 20 notes, my initial contemporaneous overview, what I would  
 21 say is they are the correct timings and there is an  
 22 inconsistency in the statement I provided some time  
 23 later.  
 24 MS JOHNSON: Thank you. Those are my questions.  
 25 SIR JOHN SAUNDERS: Thank you.

1 Just one final, entirely different topic from  
 2 anything you've heard about before. I have become  
 3 increasingly concerned that the understanding of what is  
 4 meant by Operation Plato and to where it relates is  
 5 somewhat different in the Fire Service and the  
 6 Ambulance Service to the police. Just let me try and  
 7 explain what I mean.  
 8 When police officers were giving evidence there was  
 9 consideration of questions of when you put  
 10 Operation Plato on standby or you rescind the order for  
 11 it. What the police officers, and this is  
 12 a generalisation, were explaining is that  
 13 Operation Plato is not restricted to an individual  
 14 place, it actually covers an area. I just wonder  
 15 whether that was your understanding and that of other  
 16 GMFRS, or whether when Operation Plato is declared, it's  
 17 declared in relation to the arena rather than a general  
 18 area --  
 19 A. No, sir, if I --  
 20 SIR JOHN SAUNDERS: -- or is it something you haven't  
 21 thought about?  
 22 A. If I give you my understanding of Op Plato, that could  
 23 well be declared for a single site, so for example the  
 24 arena, or if it's multi-seated sites or attacks, it's in  
 25 my understanding -- it still would come under Op Plato.

1 So it could be arena, Arndale, and a number of other  
 2 locations.  
 3 SIR JOHN SAUNDERS: So you would expect the police to say,  
 4 "Operation Plato is declared for the arena", or,  
 5 alternatively, "Operation Plato is declared for the  
 6 whole of the Manchester area"?  
 7 A. Once Operation Plato is declared, it then would be down  
 8 to that tri-service communication to undertake the joint  
 9 understanding of risk to identify where the risk areas  
 10 are. So whether that's across Greater Manchester or  
 11 whether that's just one location. We would need  
 12 a conversation.  
 13 SIR JOHN SAUNDERS: Did any discussion like that ever take  
 14 place on this particular night?  
 15 A. I don't believe so.  
 16 SIR JOHN SAUNDERS: It's relevant because it makes zoning  
 17 much more important at the arena, so you can keep  
 18 Operation Plato in existence across Manchester but  
 19 actually the whole of the arena could be a cold zone.  
 20 Is it not significant that everybody understands that?  
 21 A. I think if I just put a bit of context: when I was  
 22 informed by Chris Hill on the evening of the zonings,  
 23 the information I received was: the hot zone is the  
 24 arena itself, the bowl, that will be a hot zone for  
 25 3 hours; the warm zone is the outer part; and then the

1 cold zone. But that is the information or the — the  
2 information Andy was trying to get to the bottom of when  
3 he arrived at the location when there was that bit of  
4 conflict between me just putting out Op Plato and the  
5 conversation that the chief fire officer has had with  
6 Steve Hynes. There's two parallel, I suppose,  
7 discussions, understanding of what's going on or what  
8 isn't going on at the time.

9 SIR JOHN SAUNDERS: Thank you.

10 I've asked that question of this witness. I just  
11 want people to know that it is something about which I'm  
12 interested.

13 MR GREANEY: Sir, thank you very much indeed. In a moment  
14 I'm going to invite you to take a break.

15 First of all, you'll remember that I suggested  
16 during the course of my questioning that when Mr Gaskell  
17 said on 21 June that he had felt at a significant  
18 disadvantage on the questioning, that that had been  
19 directed at Mr de la Poer. I've been reminded that it  
20 was not directed at Mr de la Poer but directed at  
21 counsel to one of the core participants.

22 SIR JOHN SAUNDERS: I don't actually remember any inference  
23 that it was directed at Mr de la Poer and I certainly  
24 hadn't taken it that way.

25 MR GREANEY: He did, I'm afraid, and that's why I'm putting

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1 it right.

2 SIR JOHN SAUNDERS: Right, thank you.

3 MR GREANEY: That concludes the evidence of Mr Lawlor.

4 SIR JOHN SAUNDERS: Thank you for coming back. I know it's  
5 a difficult experience, so thank you for helping me with  
6 the evidence you have given.

7 MR GREANEY: Naturally we would next go to the evidence of  
8 Mr Fletcher, but for good reasons we're going to  
9 interpose Assistant Chief Constable Hankinson.

10 SIR JOHN SAUNDERS: Shall I assume for the future that  
11 anything you do is for a good reason unless you're asked  
12 to the contrary?

13 MR GREANEY: That would be a good approach, sir. Thank you.  
14 (10.36 am)

(A short break)

16 (10.55 am)

17 MR GREANEY: Sir, thank you. Assistant Chief Constable  
18 Catherine Hankinson of West Yorkshire Police is in the  
19 witness box and I'll ask that she be sworn, please.

ACC CATHERINE HANKINSON (sworn)

Questions from MR GREANEY

22 MR GREANEY: Would you begin by telling us your full name,  
23 please?

24 A. Catherine Hankinson.

25 Q. Have you been an assistant chief constable with West

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1 Yorkshire Police since 29 May 2017?

2 A. Yes.

3 Q. Prior to that, had you spent your entire professional  
4 life in Greater Manchester Police?

5 A. Yes.

6 Q. Having joined that force on 14 August 1995?

7 A. Yes.

8 Q. And leaving GMP on 18 May 2017, in order to take up your  
9 current post 11 days later?

10 A. Yes.

11 Q. Without any disrespect to your distinguished service,  
12 I'm not going to ask you about the whole of that period.

13 But what I would like to do is to ask you about four  
14 particular aspects of your career within GMP before we  
15 move on to the critical issues which, as you know, are  
16 your involvement in Exercise Winchester Accord, your  
17 engagement with HMIC in the latter part of 2016 and in  
18 particular the hot debrief that was undertaken with you  
19 by Mr Buchan on 3 November 2016. So let's deal with  
20 those four aspects before we get to those matters.

21 First, at any stage whilst a GMP officer, did you  
22 serve in the operational communications branch?

23 A. Yes, I did.

24 Q. When was that and in what capacity, please?

25 A. That was, I believe, between 2002 and 2003, in

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1 a capacity as the force duty officer.

2 Q. So that in fact answers the second of the issues that  
3 I wanted to deal with, which was whether you had held  
4 the role of FDO in GMP and it's clear that you did  
5 between 2002 and 2003.

6 A. Yes.

7 Q. So in relation to that period, which gave you some  
8 experience of the OCB and the FDO role, first of all did  
9 you learn anything about action cards during that  
10 period?

11 A. Not that I can recall.

12 Q. Secondly, 2002 to 2003 was obviously before the idea of  
13 Operation Plato had entered policing.

14 A. Yes.

15 Q. But nonetheless, was it obvious to you, based upon that  
16 experience that you had at that stage, that in the event  
17 of any form of major incident, there was a risk of the  
18 FDO becoming overwhelmed or was that not obvious to you?

19 A. I don't think I would use the term overwhelmed. I think  
20 the force duty officer is one of those roles which by  
21 its very nature doesn't often have a steady demand  
22 coming in. There might be periods of downtime and then  
23 there might be two or three incidents that happen at  
24 once. So certainly it is a very busy role at times and  
25 one where you have to make quick critical decisions, but

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1 I don't recall ever feeling or understanding about being  
2 overwhelmed.  
3 Q. So you had actually performed the role of FDO yourself  
4 during that period, 2002 to 2003?  
5 A. Yes.  
6 Q. And I believe what you're explaining to us is that there  
7 would be periods which weren't terribly demanding at  
8 all?  
9 A. Mm—hm.  
10 Q. There would be periods that were demanding, but that you  
11 never personally had an experience of feeling  
12 overwhelmed?  
13 A. That's right.  
14 Q. Were you aware of any more general sense within policing  
15 of the risk of the FDO becoming overburdened, let's use  
16 a different word, in the event of a major incident?  
17 A. At the time when I was the force duty officer?  
18 Q. Yes.  
19 A. No.  
20 Q. So those are the first two issues, the OCB and the FDO.  
21 The third issue and still focusing on your time with  
22 GMP: did you receive during your service in that force  
23 any training in Operation Plato?  
24 A. I think — well, I would have done as part of my role as  
25 a strategic firearms commander towards the latter end,

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1 I would imagine, but I haven't seen my training record  
2 so I couldn't tell you exactly which.  
3 Q. That's a perfectly reasonable observation for you to  
4 make, that the training records aren't on your evidence  
5 proposal. I was simply seeking to capture your evidence  
6 about whether you recalled any training and you do  
7 recall some training towards the latter end of your  
8 service and therefore, it would seem, before your  
9 engagement with HMIC; am I correct?  
10 A. I'm trying to think when my initial strategic firearms  
11 command course was. I think it was in the June.  
12 I honestly couldn't tell you whether it was before or  
13 after.  
14 Q. I'm not going to put you on the spot, that wouldn't be  
15 fair. But you had received some training in  
16 Operation Plato although it may have been after you  
17 engaged with HMIC.  
18 Really what I was driving at was: in late 2016,  
19 during that period when you were engaging with HMIC, and  
20 I suppose into 2017, when you were the temporary  
21 assistant chief constable, did you consider at that  
22 stage or at those stages that you had a good  
23 understanding of Operation Plato?  
24 A. Yes.  
25 Q. Issue 4, and then we'll move on into the critical

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1 issues. Whilst a GMP officer, did you qualify as  
2 a Gold commander?  
3 A. In what sense, sorry?  
4 Q. In the sense of being trained and able to perform the  
5 role of strategic commander in the event of a major  
6 incident, whether pre-planned or spontaneous?  
7 A. Yes, sorry, there are different kinds of Gold command.  
8 Are you referring to the multi-agency Gold command?  
9 Q. I suppose I am. You had qualified in that role?  
10 A. Yes.  
11 Q. And did you before October 2016 have actual experience  
12 of Gold command in such a situation?  
13 A. I think my course was around the Christmastime of 2015.  
14 I obviously had the part to play in Winchester Accord —  
15 Q. Exactly, yes.  
16 A. — but no actual live-time experience of a major  
17 incident where I performed that role, no.  
18 Q. That's helpful and that was really what I wanted to be  
19 clear about. So against that background let's turn then  
20 to Exercise Winchester Accord. Have you been following  
21 the proceedings before the chairman to some extent at  
22 least?  
23 A. To some extent.  
24 Q. I appreciate you're extremely busy and can't be watching  
25 it day in, day out, but you have a general awareness of

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1 the issues we're exploring?  
2 A. Yes.  
3 Q. You may know therefore that the inquiry already has  
4 considerable knowledge of Exercise Winchester Accord,  
5 but you had an involvement, which, as you'll appreciate,  
6 may add to the chairman's understanding.  
7 At the time of Exercise Winchester Accord, so  
8 in May 2016, were you a chief superintendent?  
9 A. Yes.  
10 Q. What was your post or position at that time?  
11 A. I was working at that time in the change branch in  
12 headquarters.  
13 Q. What did that involve?  
14 A. That would have involved the different programmes of  
15 change across GMP. There would have been certain  
16 aspects of work that were being run. I would have been  
17 involved in some of those aspects of work within the  
18 change branch at the time.  
19 Q. By change, should we understand that you were seeking to  
20 drive improvement within the organisation?  
21 A. Yes, across the organisation.  
22 Q. There are many, many emails that you have helpfully  
23 produced and we're only going to look at a handful of  
24 them, so some of those issues I'm going to deal with in  
25 summary. If you think we need to delve into the

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1 underlying material let me know. In simple terms, on  
 2 becoming aware the exercise was to take place, did you  
 3 agree to undertake the role of Gold commander?  
 4 A. I did.  
 5 Q. In your witness statement — this is your first  
 6 statement of 8 April 2021, I'll give the INQ reference  
 7 but we don't need it on the screen, {INQ041068/5}.  
 8 In that witness statement at page 5, paragraph 21,  
 9 you make two connected observations about Exercise  
 10 Winchester Accord that I would like to ask you about.  
 11 You say first of all:  
 12 "I don't recall much about the exercise."  
 13 Then you go on to say:  
 14 "I do not recall anything being raised with me about  
 15 joint working or a delay in the deployment of the other  
 16 blue light services during the exercise."  
 17 So I hope I haven't picked those two sentences out  
 18 unfairly, but do those represent your recollection of  
 19 Winchester Accord?  
 20 A. Yes.  
 21 Q. As you will probably be aware, Exercise  
 22 Winchester Accord revealed, these are my words, not the  
 23 chairman's, a failure in joint working and they revealed  
 24 also a delay in the deployment of ambulance and Fire and  
 25 Rescue Service personnel that, in the event of

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1 a real-life incident, would have been capable of costing  
 2 lives. I'm sure you're aware of that now?  
 3 A. Yes.  
 4 Q. Are you able to help us with how, as Gold for the  
 5 exercise, that passed you by?  
 6 A. Yes. I think to explain, largely in terms of the  
 7 location, so on the night I was probably there for 4 or  
 8 5 hours of the exercise, which ran for 2 or 3 days.  
 9 Q. It did.  
 10 A. I was positioned, at the request of the people running  
 11 the exercise, on the fourth floor of the headquarters  
 12 building. The control rooms and so on are on  
 13 a different floor, on the third floor, and my role on  
 14 the night in terms of testing the draft strategic  
 15 coordination centre plan and pulling together the SCG  
 16 necessitated me being on that fourth floor, and  
 17 I therefore didn't venture down on to the third floor,  
 18 which is where the operations rooms and the FDO were  
 19 situated. Hence I wouldn't have been involved in any  
 20 conversation or awareness around anything that arose  
 21 in that respect.  
 22 Q. I have understood, I think, what you're saying, and  
 23 indeed it reflects what's in your statement, that you  
 24 were located in a different place from the FDO.  
 25 A. Yes.

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1 Q. So that you were not able to see what the FDO was or was  
 2 not doing?  
 3 A. Yes.  
 4 Q. And no one communicated to you that night that there  
 5 were issues with the FDO calling forward the  
 6 Ambulance Service and the Fire and Rescue Service?  
 7 A. No.  
 8 Q. One of the issues that the inquiry has been considering  
 9 is whether it would be fair to say that Greater  
 10 Manchester Police, in the course of exercising such as  
 11 Exercise Winchester Accord, was concerned with its  
 12 deployment, how it performed, how it got on to the  
 13 ground and then, once it had seen that, it really wasn't  
 14 very interested in what the other emergency services  
 15 were doing. Do you think it would be fair to suggest  
 16 that the fact that you were unaware of these problems  
 17 with the other emergency services is illustrative of  
 18 that?  
 19 A. No, I don't think that would be fair. I think there was  
 20 a very specific difference in terms of where I was  
 21 located, which perhaps meant that I wasn't actually  
 22 seeing first-hand what might have been unfolding, if  
 23 indeed things were. I think within the strategic  
 24 coordination group, there was chance for fire and  
 25 ambulance, who were both present, I believe, to raise

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1 any issues that they knew about. My general context of  
 2 GMP's working with other agencies was good and strong.  
 3 So no, I don't think that would be, in my mind, a fair  
 4 reflection.  
 5 SIR JOHN SAUNDERS: In real life, when it happened, the FDO  
 6 and Gold commander were situated in entirely  
 7 different — they were in different buildings?  
 8 A. Yes.  
 9 SIR JOHN SAUNDERS: So that's how it was going to be in real  
 10 life, so I just wonder why, when you're in the same  
 11 building on different floors, you wouldn't expect — how  
 12 would you expect — would you have expected to be in the  
 13 same place as the FDO?  
 14 A. I think what I'm trying to say is that had an issue been  
 15 brought to my attention on the night, I would have known  
 16 about it. I accept what you're saying about the fact  
 17 that there are different buildings in different  
 18 situations, all I can say is it wasn't brought to my  
 19 attention on the night and I wasn't aware of it.  
 20 SIR JOHN SAUNDERS: Ambulance and fire, who were there with  
 21 you in the SCG, never said to you: there's been a real  
 22 problem we didn't get called up?  
 23 A. No, not that I can recall.  
 24 SIR JOHN SAUNDERS: That would seem to be indicative of the  
 25 exercise not operating very well?

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1 A. I suppose that's indicative of them not having that  
2 issue communicated to them. I don't know, I can't speak  
3 on behalf of them, obviously.  
4 SIR JOHN SAUNDERS: Thank you.  
5 MR GREANEY: But at all events, certainly during the course  
6 of the exercise, you did not become aware of that  
7 particular problem?  
8 A. No.  
9 Q. Or those problems with joint working and, in particular,  
10 the delay in deployment of other emergency services?  
11 A. No.  
12 SIR JOHN SAUNDERS: Can we just be clear? You were there  
13 for 4 to 5 hours on the night?  
14 A. I think so, yes.  
15 SIR JOHN SAUNDERS: Presumably that does cover the period  
16 when the failure to get fire and ambulance there --  
17 A. Yes, I think from listening to the evidence it was  
18 probably within the first couple of hours, so yes,  
19 it would.  
20 MR GREANEY: The assistant chief constable did make daybook  
21 entries in relation to this, but I can shorten it, sir,  
22 say your understanding is correct, that the assistant  
23 chief constable was in position at the time that there  
24 was this delay.  
25 SIR JOHN SAUNDERS: So a 2-hour delay in calling them

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1 forward, ie firearms have gone in, cleared the building,  
2 it's now ready for the rescuers to come in, it took  
3 2 hours to do that and that's just something you didn't  
4 know about?  
5 A. I don't know whether it was 2 hours, sorry. I think I  
6 have just referenced the first couple of hours, sorry.  
7 SIR JOHN SAUNDERS: Right.  
8 MR GREANEY: We've seen reference, repeatedly in fact, to  
9 a delay of 2.5 hours --  
10 SIR JOHN SAUNDERS: That's where I got it from.  
11 MR GREANEY: I think when Mr Fletcher gave evidence much  
12 earlier, he said he thought it was something in the  
13 order of 1.5 hours, but we're talking about  
14 a significant period of time.  
15 But at all events you didn't know about it that  
16 night because no one drew it to your attention either  
17 from the control room or from the SCG where you were?  
18 A. Not that I can recall at all, no.  
19 SIR JOHN SAUNDERS: So at the SCG, what did you talk about?  
20 A. Many, many different things. There were obviously lots  
21 of partners, aside from fire and ambulance, at the SCG,  
22 as you'd expect, category 1 and 2 responders from the  
23 Trafford Centre.  
24 SIR JOHN SAUNDERS: Who need to be prepared for what's  
25 happening.

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1 A. We need to think about what's happened, what is  
2 happening now -- and there was further intelligence  
3 coming in at the time as part of the live exercise which  
4 we needed to consider, including information about other  
5 attacks in different places. And we also then needed to  
6 consider how each agency played their part in moving  
7 forward within the next few hours.  
8 But also the point of an SCG is to try and always  
9 have an eye on that longer-term recovery as well, so  
10 lots of things around infrastructure/transport as well  
11 as the actual incidents that were happening at the time.  
12 SIR JOHN SAUNDERS: Okay, so possible longer-term problems  
13 were being brought to your attention and you were dealing  
14 with them?  
15 A. Mm.  
16 SIR JOHN SAUNDERS: But the immediate problems were not  
17 being drawn to your attention therefore you weren't  
18 dealing with them?  
19 A. There was no reference that I can recall to any issues  
20 in terms of fire or ambulance being called to an FCP.  
21 SIR JOHN SAUNDERS: Okay, thank you.  
22 MR GREANEY: So what is very clear is that you didn't know  
23 about those problems on the night and obviously you can  
24 only address what you are aware of. Subsequently, you  
25 tell us in your witness statement that you attended

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1 debriefs, both internal and joint service?  
2 A. Yes.  
3 Q. And again I'm not proposing to take you to those, we've  
4 looked at them many times, but if you feel it would help  
5 you, you need only tell me.  
6 Would it be fair to say that during the course of  
7 those debriefs, equally you did not pick up on the fact  
8 that there had been major problems with joint working  
9 and a delay in the deployment of the other emergency  
10 services?  
11 A. No, I think it's fair to say that when you read both of  
12 those debrief documents, there are a couple of  
13 references to -- I think one says something like the TFC  
14 on the ground was inundated with questions from  
15 emergency service colleagues, that kind of -- so there  
16 was that kind of comment, but in terms of any major --  
17 which would suggest that they were there at the scene  
18 together. But in terms of any major issues in terms of  
19 that co-location, no, I don't think I was aware.  
20 Q. So we know that, for example, behind the scenes -- and  
21 this was before you were responsible for OCB, so no  
22 reason why it would have been brought specifically to  
23 your attention -- for example Mr Fletcher of GMFRS was  
24 emailing Superintendent Giladi, essentially saying: this  
25 just didn't work that night, we need to do something

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1 about it, we need to put some training into place. But  
 2 none of that was emerging with any clarity during the  
 3 debriefs that you attended?  
 4 A. No.  
 5 Q. We're going to come on shortly to the role that you  
 6 assumed in October 2016 as temporary assistant  
 7 chief constable in GMP. But what I've been referring to  
 8 and what you are aware of now, but were not aware of  
 9 at the time in relation to these problems, would it be  
 10 fair to say that that information would have been of  
 11 assistance to you in the role that you undertook from  
 12 October 2016?  
 13 A. Yes. Along with many, many other things that would  
 14 have, but yes.  
 15 Q. In particular perhaps it would have been of assistance  
 16 to you in the major task that you were very shortly  
 17 thereafter confronted with of liaising with  
 18 Her Majesty's Inspectorate?  
 19 A. Yes.  
 20 Q. So let's turn then to HMIC, the Inspectorate. Sir,  
 21 I hope you don't feel that I'm moving over these issues  
 22 too quickly. Obviously I'm keen to deal with this  
 23 evidence as efficiently as possible given the burden of  
 24 this week.  
 25 Let's turn to HMIC. I want to ask you about two

1 issues in particular that are connected with each other  
 2 and in fact connected with Exercise Winchester Accord.  
 3 The first is your involvement in late 2016 with the  
 4 Inspectorate in relation to their CT2 section report.  
 5 A. Yes.  
 6 Q. The second is what you did after the hot debrief on  
 7 3 November that you accept, I think, that you did  
 8 receive.  
 9 A. Yes.  
 10 Q. So there are two connected issues: first of all,  
 11 what was happening between you and the Inspectorate over  
 12 that period and, secondly, what happened after the  
 13 3 November debrief.  
 14 Before that I just want to set the context. The  
 15 context, as you're aware, is the evidence of  
 16 Andrew Buchan of the Inspectorate given on 8 February of  
 17 this year, Day 61, and I know that you read that before  
 18 you gave your statement of 8 April.  
 19 A. Yes.  
 20 Q. And that you've had an opportunity, either overnight or  
 21 this morning, to refresh your memory about some  
 22 particular parts of it?  
 23 A. Yes.  
 24 Q. I'm going to set out a summary of what Mr Buchan said  
 25 without at this stage seeking an explanation or response

1 from you, but I do promise you'll be given that  
 2 opportunity.  
 3 A. Okay.  
 4 Q. As you'll recall, Mr Buchan explained that CT2 was  
 5 a HMIC inspection into, in broad terms, the question of  
 6 how well equipped police forces were to respond in the  
 7 first few hours of a Plato incident.  
 8 A. Yes.  
 9 Q. So this was not something that was specific to GMP,  
 10 although GMP was one of a number of forces -- I think  
 11 from memory 15 -- that were visited. Mr Buchan went on  
 12 to explain to the chairman that HMIC's work in the  
 13 course of CT2 had identified, or at any rate had  
 14 emphasised, the risk of the FDO becoming overburdened  
 15 in the event of an Operation Plato incident and also the  
 16 assistance that action cards might provide within the  
 17 OCR in the event of such an incident. So I hope I've  
 18 done justice with that a very short summary to what  
 19 he was communicating to others.  
 20 As you know, he told the chairman that in the hot  
 21 debrief, that, so that information I have just  
 22 summarised, was communicated to you along with a need to  
 23 do something about it. He made that point at a number  
 24 of stages in his evidence, but perhaps with greatest  
 25 clarity in answer to some questions of the chairman.

1 So Mr Lopez, could we go to the transcript for  
 2 Day 61, please, pages 79 to 80?  
 3 Line 13 on page 79 {Day61/79:13}:  
 4 "Question: So that we're clear, as I'm sure we're  
 5 all now very clear about it, the problem with the FDO  
 6 potentially being overburdened was something you  
 7 identified across your work but was most certainly  
 8 something you specifically identified within GMP?  
 9 "Answer: That's correct."  
 10 And the chairman then said:  
 11 "Question: And would identify in the debrief that  
 12 you did to them?  
 13 "Answer: Yes."  
 14 "Question: We were living under a threat level  
 15 which was severe at the time?  
 16 "Answer: Correct."  
 17 This is an important line which I know you will have  
 18 a view to express about in due course:  
 19 "Question: Would you have conveyed in your debrief  
 20 the urgent need for something to be done about this  
 21 problem?"  
 22 This problem being the overburdening of the FDO:  
 23 "Answer: That's why we were having the hot debrief,  
 24 sir, to highlight those issues that the force should  
 25 take cognisance of as soon as possible."



1 Then at the very bottom of that page, page 80, line  
2 21 {Day61/80:21}:  
3 "Question: So there's no doubt from what you have  
4 said, this is something that was being communicated to  
5 the CT lead [so he'd misunderstood that you were the CT  
6 lead] within GMP at the back-end of 2016 and there is no  
7 question that the FDO is being overburdened with tasks  
8 in the initial stages of a potential Plato and will  
9 require urgent help?"

10 "Answer: That's correct."

11 So that was Mr Buchan's position. I have just taken  
12 that one example. He did say essentially the same  
13 thing, as you know, on a number of occasions. So they'd  
14 identified the risk of the FDO being overburdened and  
15 that was something that was communicated to you as was  
16 the need for something to be done about that. So that's  
17 the context and I just want now to take a step back and  
18 to eventually seek your views on whether that is an  
19 accurate reflection or not.

20 In late 2015, did you pass the senior police  
21 assessment centre?

22 A. Yes.

23 Q. In early 2016, did you attend the strategic command  
24 course?

25 A. Yes.

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1 Q. So from that time, early 2016, were you eligible for  
2 appointment to the rank of ACC or indeed above?  
3 A. Yes.  
4 Q. On 1 October 2016, did you start a period of temporary  
5 ACC duties with responsibility for the specialist  
6 operations portfolio?  
7 A. Yes, I did.  
8 Q. Did that include having responsibility from that date  
9 for the force planning unit?  
10 A. Yes.  
11 Q. And for the OCB?  
12 A. Yes.  
13 Q. So from that point in time you had ultimate line  
14 responsibility for the FDO role?  
15 A. Yes.  
16 Q. Why, insofar as you were aware, was there no permanent  
17 incumbent in that important role at that stage?  
18 A. I can't recall whether it was a retirement or somebody  
19 moving on. I honestly can't recall. I just remember  
20 the position coming up and I think a couple of us  
21 applied for that temporary vacancy and I was successful.  
22 Q. Do you recall, and again I recognise you might not do,  
23 we can find out from another source if needs be, for how  
24 long it had been the position that there was no  
25 permanent incumbent in that ACC role?

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1 A. Not the entire time. All I can recall is that I know  
2 John O'Hare did the role prior to me and I think that  
3 was between 12 and 18 months and he was temporary but  
4 I can't recall back further than that.

5 Q. That perhaps goes far enough back for my purposes.  
6 John O'Hare was a chief superintendent?

7 A. Yes.

8 Q. That's a name that we're familiar with. And he had  
9 performed that temporary ACC role with responsibility  
10 for specialist operations for a 12 to 18-month period  
11 before you took up that role from him?

12 A. Yes.

13 Q. So it sounds as if there had been a fairly prolonged  
14 period when there was no permanent incumbent in that  
15 role?

16 A. I couldn't be absolutely sure about that 12 to  
17 18 months; that's just my recollection from memory.

18 Q. I'm not going to ask you whether that was a good or  
19 a bad thing. We'll save that up for other officers.

20 Now that you look back, do you consider that  
21 you were qualified or adequately qualified for that  
22 role?

23 A. I think the role of assistant chief constable -- we  
24 quite often switch portfolios and you very much have  
25 a strategic overview and responsibility for certain

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1 parts of the business who will then generally have  
2 chief superintendents, superintendents and other people  
3 who are more specialist in that area of the business.  
4 So I think if you're asking did I have specific and  
5 previous experience in spec ops or the OCB aside from my  
6 time as force duty officer, no. But did I have,  
7 I think, the ability to maintain that strategic  
8 oversight and be an ACC with that responsibility? Yes,  
9 I did.

10 Q. You have very accurately identified what I was driving  
11 at. My question wasn't intended at all to criticise  
12 you, but the reality is that, save for that period,  
13 years earlier, a decade and a half earlier, 2002 to  
14 2003, you had no experience at all in the specialist  
15 operations branch?

16 A. That's right.

17 Q. And really what I was asking you to comment upon was  
18 whether that was a less than ideal situation.

19 A. I think it perhaps would have been ideal to have more of  
20 an understanding, so for example the role that I do at  
21 the moment in West Yorkshire is local policing and  
22 safeguarding. That's where I spent most of my police  
23 career, therefore I have a really good understanding of  
24 how that part of the business works. The role of an ACC  
25 is less about the detail and the understanding of the

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1 specific aspects of things --  
 2 Q. Sure.  
 3 A. -- more about oversight, governance, and obviously being  
 4 part of a team of chief officers , duty cover, a myriad  
 5 of other things as well.  
 6 Q. I do entirely understand all of that, which I'm certain  
 7 is accurate, but let me just drill down into the point.  
 8 By the time you became temporary ACC with this  
 9 responsibility , you were unaware, I think from what  
 10 you've told us, that there was awareness, certainly in  
 11 many parts of GMP, of the risk of the FDO becoming  
 12 overburdened in the event of an Operation Plato  
 13 situation .  
 14 A. Yes. I wasn't aware of that.  
 15 Q. So many people did know about that. I'm not going to  
 16 list them, but there were many people who knew that. So  
 17 the organisation knew about it at that level, but you  
 18 didn't know about that. Do you think that ultimately,  
 19 when you had your discussion with Mr Buchan on  
 20 3 November, that had you known about that problem, that  
 21 might have prompted you to do more than you did? I'm  
 22 jumping heard now, but --  
 23 A. That's a really difficult question, isn't it, to think  
 24 about what I would have done?  
 25 Q. It is, yes.

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1 A. But perhaps had that been in my psyche, that would have  
 2 meant that I would have had different and more full  
 3 conversations about that with Mr Buchan. I don't know.  
 4 It's very difficult to say.  
 5 SIR JOHN SAUNDERS: But it would have at least conveyed, if  
 6 you had been aware of the problem at  
 7 Winchester Accord -- I mean, what may seem extraordinary  
 8 to some, maybe, of the general public reading things in  
 9 this inquiry is that the same problem arose, the  
 10 overburdening of the FDO, a year before in an exercise  
 11 but actually nothing seems to have changed before it.  
 12 Had you been aware of the problem in Winchester Accord  
 13 and had you been aware of what was seen to be -- perhaps  
 14 we're just hearing from special people in this inquiry  
 15 who have special knowledge, but a lot of people knew  
 16 about the problem. Had you known about that, you'd have  
 17 at least understood the urgency of it, wouldn't you?  
 18 A. Yes, perhaps. I think that's a fair comment.  
 19 SIR JOHN SAUNDERS: Why only perhaps?  
 20 A. Well, because I think my reflection is I suppose there  
 21 is ... It's a difference between overburden, overwhelmed  
 22 and somebody who is always going to be very, very busy  
 23 and under significant challenge if a situation like that  
 24 arises . So I suppose -- and I know we'll come to  
 25 this -- it's about the support around the FDO as opposed

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1 to that specific role being overwhelmed or overburdened  
 2 which suggests to me an inability to cope, and I don't  
 3 think that's the sense that I got.  
 4 SIR JOHN SAUNDERS: Okay, but you hadn't done the job very  
 5 recently yourself, had you?  
 6 A. No.  
 7 SIR JOHN SAUNDERS: Had you talked to people, like the  
 8 people we've heard from, about their views about it?  
 9 A. Not in those first few weeks whilst I was preparing for  
 10 the HMIC. I spoke to the force duty officer on  
 11 a regular basis with being on cover. But that was  
 12 generally about operational issues as opposed to  
 13 a general discussion about how they felt about their  
 14 role.  
 15 SIR JOHN SAUNDERS: Right. When you had the feedback from  
 16 HMIC, did you then go and make enquiries with the people  
 17 who would know first-hand?  
 18 A. I think -- and again I hope I'm not skipping forward in  
 19 answering this, but my reflection, and I've got to be  
 20 clear that I don't remember that interview or the hot  
 21 debrief, so I'm rebuilding this recollection from  
 22 emails, daybooks, et cetera.  
 23 MR GREANEY: I understand.  
 24 A. But when I read my notes in my daybook and the emails  
 25 sent later on that evening, I don't get the sense that

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1 I am being told about a force duty officer problem of  
 2 being overburdened or overwhelmed. Rather, and I think  
 3 it is different, that the resilience is required around  
 4 that role in terms of specific roles and action cards,  
 5 so I think to me they are two different things.  
 6 SIR JOHN SAUNDERS: Whichever it is, steps need to be taken  
 7 urgently, you got that -- that was conveyed to you, was  
 8 it?  
 9 A. I don't think in my mind that was. I felt that there  
 10 were things already underway in terms of the action  
 11 cards, which I was clearly aware of in the build-up, and  
 12 referenced, I think, to us continuing with those.  
 13 I think there's reference to the HMIC being shown those  
 14 in their field visits . So in my mind this is not  
 15 something that we were starting from scratch with, this  
 16 is something where I understand there is work ongoing  
 17 with and will continue. And I think my very clear  
 18 inference from the -- as opposed to a recollection from  
 19 what I have written is that Mr Buchan has suggested that  
 20 these are things that are flagging in other places and  
 21 that rather than, as quite often happens in policing, we  
 22 take 43 different approaches to things, he is going to  
 23 refer it back into central Protect and Prepare and that  
 24 a national response will follow.  
 25 SIR JOHN SAUNDERS: Had you known, at the same time as

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1 you're getting the message from Mr Buchan, about the  
 2 problems with Winchester Accord that I have heard about,  
 3 would that have changed your attitude?  
 4 A. It may have made me ask perhaps the more specific  
 5 questions about those action cards because again  
 6 I suppose if the issue was around a lack of  
 7 communication and deployment, which I think is what's  
 8 being referred to in terms of Winchester Accord with the  
 9 two other emergency services, then part of that is  
 10 addressed by the action cards and people knowing what  
 11 their role is.  
 12 SIR JOHN SAUNDERS: Okay. So you hope the action cards  
 13 would resolve what issues there were?  
 14 A. Yes.  
 15 SIR JOHN SAUNDERS: Thank you.  
 16 MR GREANEY: We are skipping forward and that is certainly  
 17 not your fault. But the action cards are a very  
 18 important issue. HMIC had identified good practice in  
 19 other forces which had action cards, and those were  
 20 action cards that were capable of making a difference on  
 21 the night in the sense of taking responsibility away  
 22 from the FDO.  
 23 A. Yes.  
 24 Q. As you will know, Chief Inspector Booth had devised  
 25 action cards. He had intended that they should be used

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1 at Exercise Winchester Accord. Didn't happen.  
 2 A. Yes.  
 3 Q. He had intended that they should thereafter be  
 4 introduced and used. But what the inquiry knows is  
 5 those within the control room on the night of this  
 6 attack had not seen those cards. Did you know that?  
 7 A. I didn't realise that they hadn't seen those cards  
 8 because I thought that they had been emailed to people.  
 9 That might be my mistake.  
 10 Q. The actual staff on the ground — and at any rate what  
 11 is clear is that those cards were not used on the night.  
 12 A. Yes, I understand they weren't used.  
 13 Q. That was more than a year after Chief Inspector Booth  
 14 had first devised a draft. Can you explain how that  
 15 came about in circumstances in which you did recognise  
 16 that the action cards were an important part of solving  
 17 a problem?  
 18 A. I think obviously I came into this almost halfway  
 19 through, didn't I, in terms of the action card  
 20 chronology if you like?  
 21 Q. You did, yes.  
 22 A. And I've obviously listened to Chief Inspector Booth's  
 23 evidence and looked at emails and I think I'd seen the  
 24 action cards — that's the inference I'm taking because  
 25 some of the notes I make from my interview with HMIC, my

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1 mind map, if you like, in my daybook references,  
 2 I think, some of the things on the action cards about  
 3 whose responsibility different things are.  
 4 Q. HMIC had certainly seen those action cards.  
 5 A. Yes.  
 6 Q. That's clear, I agree with you.  
 7 A. So in terms of the chronology back in, I think it was,  
 8 March 2016, I think — I wasn't aware at the time of the  
 9 different attempts that Chief Inspector Booth was making  
 10 to land those within the OCB, for want of a better  
 11 phrase.  
 12 Q. Pause for a moment. Again, I entirely accept that you  
 13 can't bear any responsibility for that because you were  
 14 in change at that time and others will have to account  
 15 for that. But obviously, from October, when you do  
 16 assume responsibility for the OCR, and when those action  
 17 cards still have not been properly introduced, it does  
 18 become part of your responsibility to do something about  
 19 that?  
 20 A. Yes.  
 21 Q. But something goes wrong from that stage?  
 22 A. Yes. I think the... I think if I can try and think  
 23 about what would have been in my mind at the time, and  
 24 this again is building from the documents as opposed to  
 25 a clear recollection, I think I have seen the action

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1 cards, I think I've been briefed, which is the evidence  
 2 that I give in my interview about these action cards are  
 3 in place and that I think they're being used by the  
 4 staff, so in my mind the HMIC have been shown these and  
 5 they're in place in the OCB.  
 6 I accept that the overarching responsibility from  
 7 1 October is with me.  
 8 Q. Yes.  
 9 A. But I think as I've said previously, there are people  
 10 like Chief Inspector Booth, who seemed to be doing  
 11 a good job of trying to get these rolled out, and other  
 12 people within the OCB SLT that I honestly felt were —  
 13 either had these in place or were in the process of  
 14 developing and continue to develop them, I expected that  
 15 operational and tactical roll-out to be undertaken by  
 16 them. On reflection, I obviously wished I'd asked more  
 17 questions about that.  
 18 Q. Obviously, a leader is entitled to expect that things  
 19 that ought to be done are being done and I quite take  
 20 that point and the inquiry isn't interested in  
 21 scapegoating people, but responsibility ultimately for  
 22 ensuring that these action cards were in use in the OCR  
 23 must rest somewhere, and do you have a view about where  
 24 that responsibility rests?  
 25 A. As I've said, I think I am not in the — I don't want to

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1 suggest that because I am in this very strategic role  
2 that I've got no responsibility. Of course my  
3 responsibility as the assistant chief constable across  
4 those areas of the business at the time was to make sure  
5 those areas of the business ran well. That is my  
6 ultimate responsibility. But I have to, because of the  
7 amount of stuff that's within that area, delegate  
8 appropriately to people who have more skill and  
9 knowledge, as you've pointed out before, about specific  
10 areas than I do.

11 So did I think it was a specific person's job?  
12 I would say I would have expected that tactical and  
13 operational grip around something like the action cards  
14 to be driven forward by the SLT in the OCB, accepting  
15 that the ultimate responsibility for ensuring that  
16 happens sits with me.

17 Q. Actually on the ground, who are you talking about?  
18 Superintendent Giladi or some different person?

19 A. Superintendent Giladi was actually in the firearms  
20 Contingency Planning Unit, so within the OCB there would  
21 have been Chief Inspector Booth at the time,  
22 Superintendent Chris Hill and, just recently having  
23 taken over after stepping down from my role,  
24 Chief Superintendent John O'Hare.

25 Q. As I've said, we did skip forward.

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1 SIR JOHN SAUNDERS: Sorry.

2 MR GREANEY: I wasn't inviting you to apologise, sir, it's  
3 been helpful to get your answers to those questions now.

4 Let's just take a step back and work through what  
5 was happening between you and HMIC. So you took up your  
6 role as temporary ACC on 1 October 2016.

7 On or about 11 October, so very shortly after you  
8 assumed that new role, did you become aware of CT2 and  
9 the fact that the Inspectorate intended to visit GMP  
10 between 1 and 3 November?

11 A. I thought it was a little bit later than that, but  
12 it would have been around that time. I thought it was  
13 16 October, but it may be in the email chain. Yes, it  
14 was around that time I became aware of it.

15 Q. I think it was. I'm looking at paragraph 12 of your  
16 statement. At all events it was a week or two later?

17 A. Yes.

18 Q. In your witness statement you explain that the  
19 preparation for that inspection involved considerable  
20 work on your part at a time when you were new to the SOB  
21 and had other roles as well?

22 A. Yes.

23 Q. I dare say you could have done without it?

24 A. Well, HMIC inspections happen at fairly short notice.

25 Quite often it's something that we are alive to and

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1 ready to deal with, so whilst it would have been ideal  
2 to be later when I could have had a bit more time to get  
3 used to my own role, we don't have that luxury obviously  
4 of saying when they are.

5 Q. You set about the task and you identify in your witness  
6 statement the various things you did?

7 A. Yes.

8 Q. At all events, certainly for my part I'm not going to  
9 take you through every meeting that you attended — it's  
10 clear from your daybook there were many — or every  
11 email you sent or received on that topic. I'm just  
12 going to identify the ones that seem to be of particular  
13 importance and I hope that seems like a fair approach.

14 On 14 October, did you receive an email from  
15 Andrew Connell?

16 A. Could you take me to —

17 Q. Of course. It's paragraph 13, page 3 of your statement.

18 A. Yes.

19 Q. We can have the email on the screen, Mr Lopez, it's  
20 {INQ041071/3}. If you can enlarge the second half of  
21 the page.

22 Let's just identify the people involved. It's from  
23 HMIC Liaison, as I've said, that's a man called  
24 Andrew Connell. It comes to you and also Debbie Ford,  
25 who at that stage was an ACC within GMP.

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1 A. Yes.

2 Q. No doubt she was very well-known to you?

3 A. Yes.

4 Q. Why did you understand that she, in addition to you, was  
5 being copied into this email?

6 A. I think at the time, Debbie had responsibility for crime  
7 and CT and therefore it would have crossed over both  
8 aspects of the portfolios we had responsibility for.

9 Q. In this email, the background was dealt with. As we can  
10 see, it began:

11 "You will be aware of the notification received from  
12 HMIC in relation to their intention to visit GMP to  
13 carry out their thematic inspection of CT2 command and  
14 control of a spontaneous terrorist attack."

15 Then a little further down that page, very much  
16 towards the bottom:

17 "The aim is for HMIC to inspect forces' command and  
18 control readiness and preparedness to deal with  
19 a marauding terrorist firearms attack. The thematic  
20 inspection will seek to answer the question..."

21 Over the page {INQ041071/4}:

22 "... how well prepared is the police service to  
23 respond effectively to a terrorist attack."

24 Further down:

25 "In order to assess this, HMIC will seek to answer

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1 four diagnostic questions."  
 2 And then the first two are:  
 3 "What processes and protocols are in place for the  
 4 effective management of MTFA and how well are they  
 5 understood?"  
 6 And the second bullet point:  
 7 "How prepared is the force for the initial response  
 8 to an MTFA?"  
 9 So do you agree that that email left you in no doubt  
 10 that the inspection was concerned with how well set up  
 11 forces, including GMP, were for the initial response to  
 12 an MTFA?  
 13 A. Yes.  
 14 Q. And notwithstanding that you had not had that role for  
 15 some time, were you aware that the FDO was a critical  
 16 part of the response to an MTFA during that period?  
 17 A. Yes.  
 18 Q. So it would seem to follow that you would have been well  
 19 aware from that early stage that that would be an aspect  
 20 of matters that the Inspectorate would have been  
 21 concerned with?  
 22 A. Yes.  
 23 Q. On 19 October you received an email from ACC Ford that  
 24 further explained the purpose of the work of HMIC, and  
 25 I'm now at paragraph 16 of your witness statement.

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1 A. Yes.  
 2 Q. We'll look at this email. It's {INQ041073/1}. Again,  
 3 enlarge the bottom half of the page.  
 4 So this is an email to you, as I said 19 October,  
 5 and by way of background, ACC Ford had spoken to  
 6 Chris Byrne and I think Mr Byrne was a police officer  
 7 who had a dual role: he was part of ACPO TAM, the  
 8 predecessor of CTPHQ, and he also formed part of HMIC;  
 9 is that correct?  
 10 A. I don't know Mr Byrne, but I believe so.  
 11 Q. The third paragraph:  
 12 "Chris has confirmed what we know anyway, that this  
 13 is very much focused on force duty officers and how they  
 14 would respond in the first 4 hours of an MTFA."  
 15 A. Yes.  
 16 Q. This again is really just to emphasise something you've  
 17 agreed already, that there was no doubt about HMIC's  
 18 area of interest, that a particular focus was on how the  
 19 FDO would hold up during the early stages of an  
 20 Operation Plato incident; do you agree?  
 21 A. Yes.  
 22 Q. As part of your work of preparation for the visit of the  
 23 Inspectorate, did you invite members of the specialist  
 24 operations branch to send you anything that they thought  
 25 you ought to be sighted upon?

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1 A. I believe I did.  
 2 Q. We are now at paragraph 20 of your statement. And as  
 3 a result, did Superintendent Giladi send you the  
 4 national and regional debrief report for  
 5 Winchester Accord?  
 6 A. He did.  
 7 Q. Did you read those?  
 8 A. Yes, I did, because I responded back to him.  
 9 Q. Did you consult at that stage Superintendent Giladi  
 10 about what he thought the learning was from Exercise  
 11 Winchester Accord?  
 12 A. I can't remember whether it was Mr Giladi or Mr Ellison  
 13 that I asked that question of.  
 14 Q. What we know is that Superintendent Giladi was, as I've  
 15 told you already, contacted direct by Mr Fletcher of  
 16 GMFRS after Exercise Winchester Accord, expressing  
 17 concerns about the delay in deployment and other issues.  
 18 At this stage, with the HMIC inspection imminent, and  
 19 Superintendent Giladi sending you information, did you  
 20 obtain that information from him?  
 21 A. No.  
 22 Q. During this period did you maintain a daybook?  
 23 A. Yes, I did.  
 24 Q. Did you make a record in summary form of the meetings  
 25 that you were having about the visit of the

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1 Inspectorate?  
 2 A. Yes, in summary form, yes.  
 3 Q. I'm not going to ask you about every entry, but there is  
 4 one I would like to ask you about. It was on  
 5 20 October, so the same date, in fact, Mr Giladi sent  
 6 you the Exercise Winchester Accord documents.  
 7 {INQ041074/1}. That's your daybook. Could you go  
 8 to {INQ0414074/5}, please, first of all.  
 9 This is Thursday, 20 October, as I indicated, and  
 10 the heading is "OCB". Does this mean that you had  
 11 a meeting at the OCB or about the OCB or both?  
 12 A. I would imagine it was about the OCB, but it could have  
 13 been at the OCB. I'm not sure. My diary entry might  
 14 suggest that.  
 15 Q. Certainly, can you confirm this formed part of your  
 16 preparation for the visit of the Inspectorate?  
 17 A. I think so. Is that what... I'm trying to look at that  
 18 specific —  
 19 Q. That's what you're trying to convey in your witness  
 20 statement, I think, at page 23.  
 21 A. Yes.  
 22 Q. You say:  
 23 "I had a meeting about the OCB. I believe this was  
 24 in preparation for the HMIC visit."  
 25 A. Yes.

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1 Q. Then if we go over to {INQ041074/6}, you see, just over  
2 halfway down page, there's a reference to "declare  
3 Plato".  
4 A. Yes.  
5 Q. So it seems you were very much focused on  
6 a consideration of what would happen if the event that  
7 that were to occur, and at the very bottom of the page  
8 there is the line that I do want to ask you about:  
9 "TFC..."  
10 So tactical firearms commander?  
11 A. Yes.  
12 Q. "... [arrow] sit next to FDO/HQ."  
13 Do you see that?  
14 A. Yes.  
15 Q. Our consistent understanding in the inquiry across the  
16 evidence has been that the FDO is the initial tactical  
17 firearms commander.  
18 A. That's right.  
19 Q. On 20 October 2016, was that also your understanding?  
20 A. Yes.  
21 Q. So what did you have in mind in writing that line in  
22 your daybook?  
23 A. I can't say what was in my mind when I wrote it, but  
24 I can make an inference based on what I can see now and  
25 I would suggest that I'm thinking there that once Plato

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1 has been declared by the ITFC, which is the force duty  
2 officer, there are a number of things that that person  
3 needs to do and one of them is to inform the cadre TFC,  
4 which is the reference that I would have been making  
5 there when I say TFC. That person would then, based on  
6 time of day and their location and how far into the  
7 incident we were, would then think, "Do I need to go and  
8 sit next to the FDO at Clayton Brook or am I better  
9 positioned at HQ because the Silver room is already  
10 opened?" So I think that's about a decision that the  
11 TFC needs to take depending on the time of day and their  
12 location.  
13 Q. So if it were to be thought from that entry that it  
14 demonstrated a degree of misunderstanding about the role  
15 of the FDO and in particular his role as ITFC you would  
16 reject that?  
17 A. Completely.  
18 Q. That can go from the screen, please. In the days that  
19 followed that meeting on 20 October, you had a series of  
20 further meetings and engaged in other emails. But the  
21 next event that I want to ask you about occurred on  
22 30 October when you tasked Chief Superintendent O'Hare  
23 and Superintendent Giladi with updating the GMP  
24 Operation Plato plan. So this is paragraph 29 of your  
25 witness statement.

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1 A. Yes.  
2 Q. We'll look at the email, Mr Lopez, it's {INQ040929/1}:  
3 "John/Leor. Not sure who's in order Monday, but  
4 need one of you to action this. All forces received  
5 a letter from ACC Chris Shead NPOCC in August, dated  
6 10 August, relating to national armed policing  
7 spontaneous mobilisation update."  
8 And we did look at that much earlier in the  
9 evidence:  
10 "It reiterated the instruction that if we were  
11 dealing with an MTFA-type incident, that neighbouring  
12 forces would send [a number] of ARVs to the affected  
13 force. It specifically requires us to review our  
14 Operation Plato plans to take account of this and ensure  
15 our commanders and FDOs are aware. Our Plato plan seems  
16 to need review and this needs to be done urgently given  
17 HMIC are here Tuesday."  
18 So does it follow that by that stage, you had  
19 reviewed the GMP Operation Plato plan?  
20 A. I don't know. That was in respect of an email that I'd  
21 been sent, I think, from memory, from Inspector Roby  
22 forwarding me the plan and telling me that there was  
23 a review overdue. I can't say whether I reviewed the  
24 plan at that point.  
25 Q. Do you mean that Inspector June Roby had sent you the

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1 plan that was in place at that time?  
2 A. Yes.  
3 Q. Are you aware that that would have been SOP 47 v4?  
4 A. Yes.  
5 Q. And she had drawn to your attention that it needed to be  
6 updated?  
7 A. Yes.  
8 Q. You had only recently, I recognise, become the ACC  
9 responsible for this area. But the email from  
10 ACC Chris Shead, to which you are referring, is dated  
11 10 August, so a number of months earlier.  
12 A. Mm-hm.  
13 Q. Do you know why that email had not been actioned until  
14 you took it on on 30 October?  
15 A. No.  
16 Q. In this email that you sent to other members of the OCB,  
17 would it be fair to observe that you were seeking to get  
18 things in order before the HMIC visit?  
19 A. Yes. Actually, John O'Hare and Leor Giladi were not —  
20 well, John did have responsibility for the OCB but  
21 I sent him this to him and Leor specifically because  
22 they had responsibility for firearms and firearms  
23 policy.  
24 Q. So was the inspection by HMIC not going to be of the  
25 position as it was but of a position that you intended

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1 should be improved?  
 2 A. I think potentially both. I know that just from  
 3 experience of HMIC inspections in the past, I know that  
 4 they do a significant amount of desktop research before,  
 5 where they'll look at existing plans, et cetera, et  
 6 cetera. So I have no doubt that HMIC had version 4 but  
 7 there was a clear need, when a policy is out of date for  
 8 review, to update that and I wanted HMIC to understand  
 9 that we'd done that review and that they had a version 5  
 10 as well. So I suppose it was both.  
 11 Q. Really, what my question was driving at was that HMIC  
 12 could have done an unannounced visit. I'm not saying  
 13 they generally did but they could have done and what you  
 14 wanted to achieve was a situation in which what was in  
 15 place was better than would have been in place had there  
 16 been an unannounced visit?  
 17 A. Was the right thing.  
 18 Q. You said I think that you thought HMIC would have seen  
 19 v4. I'm not sure that's right.  
 20 A. Okay.  
 21 Q. The version that they did see was v5.  
 22 A. Okay.  
 23 Q. As we've agreed, the version in force at the time of the  
 24 30 October email was v4. Do you think that you read v4  
 25 before issuing the instruction that it be amended?

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1 A. I can't recall.  
 2 Q. We know that Superintendent Giladi created v5 really  
 3 very quickly indeed — overnight, I think, in fact. Did  
 4 you read the document that Superintendent Giladi  
 5 created, SOP 47 v5?  
 6 A. I can't recall from memory. I would expect that I did,  
 7 but I honestly can't recall that.  
 8 Q. Did you, assuming you did read it, realise that it  
 9 placed too much individual responsibility on the FDO?  
 10 A. I think what I can say is clearly, as you would have  
 11 expected, I have looked at the difference between those  
 12 two plans side by side since, before giving evidence  
 13 now.  
 14 Q. Yes.  
 15 A. And I can't recall looking at them at the time, but  
 16 I think there are very few — as quite often happens  
 17 with a review, sometimes there are no changes when  
 18 a policy is reviewed, sometimes minimal changes, and  
 19 I think there are one or two lines in that policy that  
 20 changes which includes the introduction of the reference  
 21 to the letter from Chris Shead, which is about resources  
 22 coming into an area.  
 23 Q. I think, and I'm doing this from memory, one of the  
 24 other changes within v5 was that the reflections of the  
 25 person who'd done the FDO role in Winchester Accord were

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1 included. I might have that wrong.  
 2 A. I don't recall that, but again I might be wrong. I'd  
 3 need to look at them again.  
 4 Q. At all events the question is: do you recall at that  
 5 time reviewing the plan and saying to yourself, "There  
 6 is too great a burden on the FDO in the event" —  
 7 A. No.  
 8 Q. — "of a Plato incident"?  
 9 A. No.  
 10 Q. Were you, do you think, equipped to make that assessment  
 11 bearing in mind your very limited experience of the FDO  
 12 role?  
 13 A. As an individual, maybe not. Thinking back to the 15,  
 14 maybe 20 years almost since I'd done that role — as you  
 15 quite rightly point out, things were very different  
 16 then. No, but I — again, this is, I suppose, back to  
 17 that issue of there are people who do have that more  
 18 specific expertise that are responsible for doing these  
 19 reviews that I have to rely on in that respect. It  
 20 didn't occur to me, no.  
 21 Q. So it didn't occur to you, but there were other people  
 22 within your team who did have the necessary skills and  
 23 experience to make that assessment?  
 24 A. To review that plan, yes.  
 25 Q. There were further meetings and emails, and as you

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1 mentioned earlier, you created mind maps. Would it be  
 2 fair to conclude from all of this that this was taking  
 3 up a very considerable amount of your time during that  
 4 period?  
 5 A. It definitely took up — yes, a significant amount of  
 6 time in that couple of weeks' lead-up to make sure  
 7 I understood what was required, yes.  
 8 Q. Was it your impression at the time that unless you  
 9 dedicated time to this and ensured, for example, that  
 10 there was an updated Plato plan that GMP would be  
 11 regarded as ill-prepared for a Plato incident?  
 12 A. No. Can I perhaps expand on that?  
 13 Q. Yes, of course.  
 14 A. Because I was new in role, because I didn't have  
 15 specific expertise in some of those areas and recent  
 16 expertise in some of those areas, as new to role,  
 17 I wanted to be as prepared as I could be to make sure  
 18 that I represented the force and the organisation well  
 19 and also that we were in the different areas prepared  
 20 for things.  
 21 So I didn't start this by thinking at all, "If  
 22 I don't get a grip of this we're going to be found  
 23 wanting", not at all. I would do this in the run-up to  
 24 any HMIC inspection. I've just done it very recently in  
 25 West Yorkshire. It's just that perhaps I have more

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1 understanding of the business that I'm deal with in West  
 2 Yorkshire because I've been doing it so long, perhaps it  
 3 wouldn't take quite as much time.  
 4 Q. And this is an issue that I do want to come back to once  
 5 we have looked at the hot debrief, namely whether you  
 6 were the right person in that role at that time.  
 7 A. Mm.  
 8 Q. The inspection itself took place between 1 and  
 9 3 November?  
 10 A. Yes.  
 11 Q. And I'm confident that we will be able to agree about  
 12 the following: first, that when they went into the  
 13 inspection, HMIC was concerned about the role of the FDO  
 14 in the event of an Operation Plato incident?  
 15 A. In general terms.  
 16 Q. And indeed, as you know, although I think you saw it for  
 17 the first time this morning, in the subsequent CT2  
 18 report they referenced it, so we'll have a look at that  
 19 on the screen. It's a long time since we've seen it.  
 20 {INQ025071/29}.

21 Enlarge the bottom half of the page, please:  
 22 "Force incident managers in local forces play  
 23 a particularly important role in the initial response to  
 24 a Plato incident as they must declare the Plato incident  
 25 and command the initial response. Only the police can

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1 declare a Plato incident, which is designed to trigger  
 2 a specific response from the other emergency services.  
 3 The declaration of a Plato incident will prompt  
 4 a three-way conference call between commanders in the  
 5 emergency service control rooms. This call is intended  
 6 to help ..."  
 7 And so on:  
 8 "The response to a Plato incident will be led by the  
 9 police."  
 10 And then towards further down:  
 11 "All the force incident managers we spoke to..."  
 12 And that would include those in GMP and others?  
 13 A. Yes.  
 14 Q. "... described receiving Plato updates through their  
 15 firearms command continuous development programme.  
 16 However, the majority said they felt ill-equipped for  
 17 the critical role they would perform in a Plato incident  
 18 and needed more training, guidance and exposure to Plato  
 19 exercises. This point was illustrated by one force  
 20 incident manager who said: 'I get 2 days on how to  
 21 command a vehicle pursuit and approximately 1 to 2 hours  
 22 in MTFA.'"  
 23 So that gives a flavour of the sort of concerns that  
 24 the Inspectorate had identified in the course of their  
 25 work as then set out in their report in due course.

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1 So I indicated there were a number of things we'd be  
 2 able to agree about. The first is that HMIC went into  
 3 this exercise concerned with the role of the FDO and  
 4 they came out of it concerned about the role of the FDO.  
 5 Secondly, I know that we can agree that there was  
 6 a debrief on 3 November.  
 7 A. Yes.  
 8 Q. And that you were debriefed personally by Mr Buchan?  
 9 A. Yes.  
 10 Q. And we can agree also, I know, that the role of the FDO  
 11 was discussed during that debrief?  
 12 A. Yes.  
 13 Q. And I know the extent of it is a matter in issue, but we  
 14 can certainly agree it was discussed?  
 15 A. Yes.  
 16 Q. Bearing in mind the intensity of the concern that the  
 17 Inspectorate had about the FDO role, are you able to  
 18 think of any reason why Mr Buchan would not have  
 19 explained that to you?  
 20 A. No.  
 21 Q. In the aftermath of the hot debrief, did you send an  
 22 email to all of the chief officers within your force?  
 23 A. I did.  
 24 Q. We'll have that on the screen. It's {INQ041272/1}. It  
 25 starts at the bottom of that page. As I said,

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1 3 November, timed at 7.36, and so within a number of  
 2 hours, you sent this email to the chief officers.  
 3 You told us that you don't actually recall the  
 4 debrief itself; is that right?  
 5 A. I don't, no.  
 6 Q. And do you recall sending this email?  
 7 A. No.  
 8 Q. Over the page, {INQ041272/2}. It said dear all:  
 9 "Had a half-hour hot debrief with Andy Buchan from  
 10 HMIC today. Aside from the pilot in Devon and Cornwall  
 11 we are the first group of forces to be inspected in this  
 12 thematic. They are inspecting 18 forces in total and  
 13 will then comment on the overall ability of the police  
 14 service to command and control an MTFA."  
 15 So you were making the point that this was not  
 16 specific to GMP?  
 17 A. Mm-hm.  
 18 Q. It was about forces across the country:  
 19 "In summary, really impressed with the knowledge,  
 20 capability and enthusiasm of all groups of staff spoken  
 21 to, especially the FDOs, SFCs, TFCs and OFCs. Everybody  
 22 had given them a consistent message about what would  
 23 happen in the first 4 hours of a potential MTFA and the  
 24 commanders had left them feeling very confident that  
 25 there is a plan and that it would be followed."

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1 Then this:  
 2 "Areas for development were: is there enough  
 3 resilience around the FDOs in the event we have an MTFA  
 4 style incident? This wasn't really about numbers of  
 5 people, but about people having specific roles in  
 6 specific seats. Our FDOs were able to evidence that  
 7 they had picked this up from exercising during summer  
 8 and they were on with producing guidance and crib cards  
 9 for colleagues. HMIC did accept that our current IT  
 10 hampered us but are aware this is being upgraded."  
 11 Then other areas for development were identified:  
 12 "All three of these issues are national rather than  
 13 GMP specific. I agreed that we would carry on looking  
 14 at the OCB staff crib sheets and would feed it into any  
 15 national work at a later stage."  
 16 Just pausing there, and bearing this mind that you  
 17 don't remember either the meeting or the email, do you  
 18 agree that it's clear that the issue of the ability of  
 19 FDOs to cope was raised with you by Mr Buchan?  
 20 A. Yes, the resilience around the force duty officer was  
 21 raised, yes.  
 22 Q. And you have chosen to use the word "resilience", which  
 23 is the word you use, but doesn't that really mean that  
 24 what was being raised with you was the ability of the  
 25 FDOs to cope in the event of an MTFA?

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1 A. Yes, I think that's a fair comment. This is about  
 2 understanding that that person in that role will be very  
 3 busy and that having specific roles in specific seats  
 4 will mitigate against some of that.  
 5 Q. Exactly. That is what I was going to invite you to  
 6 agree and you have done. But the way or a way of  
 7 dealing with that, as was explained by Mr Buchan, was  
 8 not expecting the FDO to do everything --  
 9 A. Mm--hm.  
 10 Q. -- ensuring that they have support within the OCR, and  
 11 that that required those within the OCR to know what was  
 12 expected of them?  
 13 A. Yes.  
 14 Q. Whether Mr Buchan emphasised the urgency of this or not,  
 15 when you look back, does it not seem to you that there  
 16 was obviously a need to respond to this urgently?  
 17 A. Yes, I think, though, it is fair to say that those -- to  
 18 me, he is ... I think he has clearly said to me there,  
 19 you know: your FDOs have told us that they've picked  
 20 this up from exercising over the summer, I know that  
 21 they've been shown the action cards, I know that the  
 22 action cards are in existence, I've seen them myself,  
 23 and, to me, I understand that that work is already  
 24 ongoing. So as I referenced before, this is not about  
 25 me recognising something and picking it up from

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1 a standing start or leaving it, for that matter: it's  
 2 work that is already ongoing and underway within the  
 3 OCB.  
 4 Q. That I understand and, for example, we have heard from  
 5 Chief Inspector Booth about the action cards. But the  
 6 reality was that an MTFA could have occurred at any  
 7 moment, couldn't it?  
 8 A. Yes.  
 9 Q. It could have happened in the minutes after you sent  
 10 that email?  
 11 A. Yes.  
 12 Q. In the event that such an incident were to occur, lives  
 13 were very likely to be lost, were they not?  
 14 A. Yes.  
 15 Q. And here was being identified a risk that the critical  
 16 person within the immediate period of an MTFA occurring  
 17 might not be able to cope, that the resilience might not  
 18 be around them. That was very important information for  
 19 you, was it not?  
 20 A. Yes.  
 21 Q. Do you think, to return to the point that the chairman  
 22 was exploring with you earlier, and that I was, that  
 23 your lack of experience in this area of policing meant  
 24 that you failed to understand just quite how important  
 25 it was?

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1 A. Again, I think it's really difficult with hindsight to  
 2 refer back to that. I think that I understood what that  
 3 issue was about. I think I understood that the action  
 4 cards were in existence and were being disseminated  
 5 within the OCB. On reflection, I do wish that after  
 6 sending that, I had more specifically and in a way that  
 7 I can evidence, because I'm sure I spoke about this to  
 8 people, but I haven't got any emails to show that, had  
 9 progressed that work and kind of put more oversight on  
 10 it. As I have mentioned before, not to diminish the  
 11 importance of it at all, it would have been something  
 12 that I expected the colleagues within the SLT to be on  
 13 with.  
 14 SIR JOHN SAUNDERS: Can I just ask a slightly different  
 15 question? You seem to be implying there that Mr Buchan  
 16 was saying to you it isn't about numbers of people, so  
 17 we don't need more people in there.  
 18 A. Yes.  
 19 SIR JOHN SAUNDERS: Whereas when things actually did go  
 20 wrong on 22 May, and that was looked at subsequently,  
 21 more people, as I understand it, were put there, there  
 22 was somebody to the second FDO, as it were, so they did  
 23 decide they needed more people and I wonder whether  
 24 there's almost a reluctance from you to -- or picking  
 25 this up to think actually we need to restructure it and

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1 have more people into it.  
 2 A. No, I definitely wouldn't have been reluctant. If  
 3 I thought that was about more people, that's what  
 4 I would have reflected and we would have had chief  
 5 officer discussions around that. We have to balance the  
 6 resource around the organisation, but there certainly  
 7 wouldn't have been any reluctance from me to say. If  
 8 the issue had been about numbers, I'd have said that.  
 9 MR GREANEY: So where it really comes to is that there was  
 10 a problem within GMP and, I have no doubt, within other  
 11 forces as well --  
 12 A. Mm--hm.  
 13 Q. -- of the FDO potentially becoming overwhelmed in the  
 14 event of a Plato incident. Inspector Roby told us that  
 15 the risk of the FDO being overwhelmed was something that  
 16 she had known about for perhaps 20 years. Certainly it  
 17 had been revealed by Exercise Winchester Accord in the  
 18 May of 2016 and here are HMIC, about 7 months before the  
 19 arena attack, emphasising that this is a problem. And  
 20 it may be that the chairman will find that by May of  
 21 2017, that problem had not been solved, that action  
 22 cards had not been disseminated to the staff within the  
 23 OCR, and that rather than removing burden from the FDO,  
 24 the further plan that was created increased the burden  
 25 upon him or her. The direct question that I'm required

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1 to ask you against that background is: what steps did  
 2 you take between 3 November and 18 May, when you left,  
 3 to avoid that situation occurring?  
 4 A. I think I ... I'm trying to think in terms of specific  
 5 steps that I can ... I understood what was already  
 6 ongoing. I am sure, but cannot evidence, the fact that  
 7 I have then had conversations. I am aware from  
 8 Mr Booth's evidence that following the HMIC he suggests  
 9 that there was, perhaps not directly from me, but  
 10 following on from feedback, there was reviews of  
 11 policies and processes and a continuation of the quest  
 12 to embed the action cards.  
 13 So I think in my mind, can I pick a piece of paper  
 14 up and say to you these are the list of things that  
 15 I did between this date and this date to progress that  
 16 issue? I can't. What I do think from this email  
 17 is that I can say I do recognise the problem, there's no  
 18 attempt to hide that area of development which was  
 19 discussed with me by Mr Buchan, but I think there is  
 20 work ongoing that addresses and mitigates that, and I'm  
 21 confident that the people at the tactical and  
 22 operational levels are getting on with it.  
 23 Q. I'm not going for a moment to suggest that all of this  
 24 rests on your shoulders, and obviously you are entitled  
 25 to rely upon others, but I'm certain we'll be able to

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1 agree that whoever's responsibility ultimately it was,  
 2 and it may well not just be one person, something  
 3 plainly went wrong or didn't go right between 3 November  
 4 and 22 May?  
 5 A. Certainly it wouldn't appear that the action cards were  
 6 properly embedded between that time.  
 7 MR GREANEY: Sir, those are all of my questions at this  
 8 stage. I'm just going to check before we take a break,  
 9 probably, what the length of questioning is of others  
 10 who have made a bid to ask questions.  
 11 I'm going to, first of all, ask Ms Roberts on behalf  
 12 of the Ambulance Service whether she continues to wish  
 13 to ask questions.  
 14 (Pause)  
 15 SIR JOHN SAUNDERS: That's her chance gone!  
 16 MR GREANEY: I'll take silence as a no. Mr Weatherby is  
 17 taking the lead on behalf of the bereaved families.  
 18 MR WEATHERBY: I think probably about 40 minutes.  
 19 MR GREANEY: Sir, then we certainly ought to take a break at  
 20 this stage.  
 21 SIR JOHN SAUNDERS: Okay, 10 minutes? And then perhaps go  
 22 on -- okay, 10 minutes.  
 23 (12.16 pm)  
 24 (A short break)  
 25 (12.32 pm)

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1 SIR JOHN SAUNDERS: Mr Greaney, have we heard anything from  
 2 Ms Roberts?  
 3 MR GREANEY: Ms Roberts has no questions. Therefore I will  
 4 turn to Mr Weatherby, and invite him to find a moment  
 5 convenient to him around about 1 o'clock to break for  
 6 lunch, please.  
 7 Questions from MR WEATHERBY  
 8 MR WEATHERBY: Thank you very much.  
 9 Ms Hankinson, I ask questions on behalf of the  
 10 bereaved families. I want to start by asking you a few  
 11 matters arising out of Mr Greaney's questions and then  
 12 I've got three particular topics.  
 13 Starting with the Plato training, did I understand  
 14 correctly from your answer to Mr Greaney at the start of  
 15 his questioning that your first Plato training was in  
 16 fact in June of 2016?  
 17 A. I ... It's difficult to say without a training record in  
 18 front of me what the actual training was called.  
 19 I think I would have had more general training, in terms  
 20 of the unarmed NCALT training prior to that, but having  
 21 not been a strategic firearms commander until June of  
 22 2016, I wouldn't have had the training specific to that  
 23 role, if that explains it a little better.  
 24 Q. Yes, that's very helpful. And of course, if you do look  
 25 at your training record and anything needs to be

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1 changed, then of course no doubt you'll get back to us.  
 2 The point I make is by the time that you were  
 3 Gold commander in Winchester Accord, you'd had no Plato  
 4 training?  
 5 A. I think it's really -- I'm really sorry, I haven't had  
 6 the opportunity to look at my training record from GMP  
 7 at all in the run-up to this. Had I known that would  
 8 have been a topic of questions then of course I would  
 9 have done. So I'm really guessing from quite a number  
 10 of years ago. What I did have --  
 11 Q. Not your fault.  
 12 SIR JOHN SAUNDERS: You carry on.  
 13 A. I was going to say, what I did have, and the reason that  
 14 I volunteered to undertake the role of Gold commander  
 15 was a specific requirement to have been multi-agency  
 16 Gold incident commander trained. I wasn't the SFC  
 17 during Winchester Accord, I was the Gold commander in  
 18 terms of the MAGIC training and I had had that training.  
 19 MR WEATHERBY: I see. Okay, so from your perspective, it  
 20 was helpful to you and your training and your  
 21 operational competence to be Gold commander in  
 22 Winchester Accord, but was it appropriate -- given what  
 23 appears to be a lack of Plato training, was it  
 24 appropriate for you to do that role?  
 25 A. I think it was appropriate. I would have had access to

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1 plans to look at beforehand. I had been an ITFC when  
 2 I was the force duty officer. I have a good  
 3 understanding from that time and from being a senior  
 4 officer in GMP about major incidents and their  
 5 management and I'd been MAGIC trained. So given the  
 6 role I was asked to perform on the night, I think it is  
 7 appropriate.  
 8 Q. Looking back on it, we'll come on to it again in  
 9 a minute, but Mr Greaney's asked you some questions  
 10 about the fact that you were unaware of what had gone  
 11 wrong regarding the FDO and the failure to call --  
 12 either to declare Plato or call forward the other  
 13 emergency services. Do you think your lack of awareness  
 14 of that was because you'd not had proper training for  
 15 that role?  
 16 A. No, I think -- I absolutely don't. I think that had  
 17 that been referred to me as an issue in the exercise,  
 18 that would have resonated with me, absolutely, and been  
 19 something that I would have taken note of.  
 20 Q. All right. I'll come back to that in a minute if I may.  
 21 Another point: you have mentioned that on  
 22 Winchester Accord you'd been involved in setting up the  
 23 strategic coordination group.  
 24 A. Yes.  
 25 Q. And that would have been some time into the exercise,

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1 wouldn't it?  
 2 A. Yes.  
 3 Q. Some hours into it. And you mentioned that there were  
 4 Fire and Rescue and NWSA personnel. Do you recall how  
 5 they were?  
 6 A. I don't, no. I don't recall that --  
 7 Q. We can find out --  
 8 A. (overspeaking).  
 9 Q. We can find that out from somewhere else. Just  
 10 a general point about responsibility and delegation.  
 11 You have said a number of times that one of your roles  
 12 as assistant chief constable for special ops and more  
 13 generally as a commander was to delegate and for other  
 14 people to make things happen and of course that's right,  
 15 isn't it?  
 16 A. Yes.  
 17 Q. You can't be expected to do all of the tasks, there's  
 18 a chain of command. But it's right also, apart from  
 19 delegation, you also -- with command comes  
 20 responsibility?  
 21 A. Yes.  
 22 Q. When you delegate something down a chain of command, it  
 23 remains your responsibility to ensure that those who  
 24 have taken on those delegated tasks actually deliver;  
 25 yes?

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1 A. Yes.  
 2 Q. So the general points that have been made to you about  
 3 action cards and resilience and support to the FDO that  
 4 were raised with you, and again we'll deal with this in  
 5 a little more detail in a few moments, but the general  
 6 points that were raised quite early in your tenure, they  
 7 simply hadn't been dealt with by 18 May when you moved  
 8 on, had they?  
 9 A. I think to say they hadn't been dealt with -- I think  
 10 that there was work ongoing, as I've referenced before,  
 11 but I think it's fair to say that they weren't fully  
 12 embedded within the OCB.  
 13 Q. That was your responsibility to have made that happen in  
 14 those months?  
 15 A. Yes, the overarching responsibility sat with me, yes.  
 16 Q. Yes. Can I move to the first of my topics then, and  
 17 that's the Greater Manchester Resilience Forum. In your  
 18 statement, and it's paragraphs 56 and 57, you refer to  
 19 two resilience forum meetings that were relevant to the  
 20 time that you were in this post as temporary ACC for  
 21 special ops. I just want to ask you a few questions  
 22 about that.  
 23 Can I ask you a general question. So far as your  
 24 view, looking back on the period you were in that post,  
 25 did GMP in your view take the resilience forum seriously

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1 enough at that time?  
 2 A. I can't remember having a particular discussion about  
 3 that issue. I think my reflection at the time was that  
 4 partnership working at all levels was good, there was  
 5 not a cause for concern that was certainly raised with  
 6 me. So I'd have to say I do think we took our  
 7 partnership responsibilities seriously.  
 8 Q. The GMP institutional position appears to be that GMP  
 9 did take it seriously enough, although they accept that  
 10 there was not sufficient consistency of senior officer  
 11 involvement. No doubt I'll be corrected if that is  
 12 a wrong summary at some point, but is that something  
 13 that you would agree with?  
 14 A. I think, having looked back during the course of the  
 15 evidence, I can only obviously comment on the two when  
 16 I was in post. I note there are a number of others  
 17 where perhaps the ACC at the time didn't attend, but  
 18 there were suitable representatives that attended in  
 19 their place. It's difficult for me to comment on  
 20 others' behavies.  
 21 Q. Yes. Is it the case, let me put it to you for your  
 22 comment, that joint working and planning with other  
 23 emergency responders came some way down the list of  
 24 Greater Manchester Police priorities in 2016 and 2017?  
 25 A. I don't think so, no. That's not my memory of how

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1 I felt things were in GMP and it's certainly not my  
 2 reflection of how I consider things to be. We can't  
 3 deal with many of the incidents that we deal with on  
 4 a daily basis, irrespective of it being a major  
 5 incident, without partnership involvement. We work very  
 6 closely together.  
 7 Q. I put that to you in a general way. I'll come back to  
 8 it in a more specific way when I take you through some  
 9 of the emails on the preparation for the HMIC.  
 10 In terms of the period from 1 October to 18 May, you  
 11 didn't in fact attend the Greater Manchester Resilience  
 12 Forum, did you?  
 13 A. No, that's right.  
 14 Q. There were two meetings during your tenure, during that  
 15 period, the first of which was in December. You explain  
 16 in your statement that you had a conflicting GMP  
 17 management meeting and in fact another acting ACC went  
 18 in your stead; is that right?  
 19 A. Yes.  
 20 Q. The second one, 27 March, you missed because you were  
 21 otherwise engaged with a practice interview for a new  
 22 job somewhere else; yes?  
 23 A. A coaching appointment, yes.  
 24 Q. Yes. I'm not sure exactly how long in advance GMRF  
 25 meetings are scheduled, but it's certainly many months,

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1 isn't it?  
 2 A. It is, but if I could perhaps make mention of the fact  
 3 that that meeting on 27 March, a Monday, was supposed to  
 4 have happened on Friday, 10 March.  
 5 Q. Right (overspeaking) rearranged the meeting?  
 6 A. I think I was scheduled to attend that but it was  
 7 cancelled 2 days before, on 8 March, and then  
 8 rescheduled, at obviously quite late notice, to the  
 9 Monday — it's about 11 days afterwards, isn't it?  
 10 Q. Sorry, I missed the last part. The coaching session was  
 11 re-arranged?  
 12 A. No, the resilience forum meeting should have been on  
 13 Friday — I think they're always on a Friday between 10  
 14 and 1 is what it looks like from the sequencing of  
 15 events. When you look at the December meeting,  
 16 certainly to try and make sure people are there, they  
 17 are planned at the bottom and that plan suggests that  
 18 it's on Friday, 10 March 2017. But that meeting was  
 19 cancelled on 8 March and rescheduled to Monday the 27th.  
 20 Q. Right. So certainly some — so it's rescheduled, it's  
 21 very helpful explaining that, but it was certainly  
 22 rescheduled. The coaching session took precedence over  
 23 the resilience forum meeting so far as you were  
 24 concerned?  
 25 A. No, I don't think so. When I was initially asked,

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1 I didn't realise that the rescheduling had happened, and  
 2 when I was initially asked to look at 27 March in my  
 3 diary and recognised that I had attended the coaching at  
 4 the same time as the meeting had taken place,  
 5 I questioned that in my mind, which is why I've  
 6 eventually come to the understanding that that meeting  
 7 had been rescheduled.  
 8 When the meeting was rescheduled and a new invite  
 9 was sent, it was actually declined by my PA on the day  
 10 that I was in hospital having an operation, and I think  
 11 therefore when I have come to arrange that coaching  
 12 session after that time, to all intents and purposes  
 13 that day has been free. So I don't think I have  
 14 prioritised one over the other as far as I can tell from  
 15 the documentation.  
 16 Q. Right. Okay. We know from records that in fact GMP  
 17 sent an inspector rather than an ACC. So can you help  
 18 us — if the problem was a diarising problem that you're  
 19 describing, can you help us why another suitably ranking  
 20 GMP officer wasn't tasked to go to the resilience forum?  
 21 A. I think my understanding is that Mr Giladi would have  
 22 been my deputy, if you like, and I don't know why he  
 23 wouldn't have attended in my place but I think  
 24 Inspector Lee Parker did so. That's the only thing  
 25 I can help you with, with that, sorry.

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1 Q. Can you recall taking any steps to make sure a suitably  
2 ranking officer attended?  
3 A. Not personally, no. I would have expected my PA to do  
4 that on my behalf because she would understand that  
5 somebody would need to represent me there.  
6 Q. The responsibility on GMP to have a suitably ranking  
7 officer, though, can't be just delegated to a PA, can  
8 it? It was your responsibility or that of the Greater  
9 Manchester Police senior leadership team to ensure that  
10 there was a suitably ranking officer there?  
11 A. Yes, sorry, I wasn't meaning to suggest that it is the  
12 responsibility of the PA. I was trying to explain the  
13 way that that day-to-day diary management happens with  
14 a PA who knows that area of the business. I feel that  
15 she would, having declined for me, have taken steps to  
16 make sure a suitably senior rep attended.  
17 Q. I'll move on. Just on this topic finally, can you help  
18 us with what you did in preparation for GMRP meetings  
19 during your period? I know there's only two meetings  
20 and you couldn't go to either of them, but what  
21 preparation did GMP do, so far as you're aware, for  
22 those meetings?  
23 A. I honestly don't recall, I'm sorry.  
24 Q. Can you help us with what follow-up there was after the  
25 meetings?

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1 A. Again, I don't recall whether I was — and again it's an  
2 assumption, but I would assume that I have been sent  
3 minutes at some point along with the other people in the  
4 chain that would have attended and there would have been  
5 actions on that for various members of GMP and other  
6 people that attended, but I don't recall any of that,  
7 sorry.  
8 Q. Okay, I will move on.  
9 Second topic, Winchester Accord. You've been asked  
10 a fair number of questions about this so I'll go as  
11 swiftly as I can. I want to look at whether the issue  
12 of the other blue light services would be something that  
13 fell off the table for Greater Manchester Police's  
14 orientation towards Winchester Accord. So that's where  
15 I'm headed with my questions.  
16 Mr Lopez, could we have {INQ041078/2}, please.  
17 You've been asked to look at this, but just  
18 a different point that I want to make with it. Your role  
19 as the Gold commander was essentially to make the police  
20 response work, is that right, to give it strategic  
21 direction but also, as top of the chain, to make sure  
22 the command structure worked?  
23 A. Yes, I think that's fair.  
24 Q. This is your daybook where you have a note ahead of the  
25 actual operation —

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1 A. Mm—hm.  
2 Q. — sorry, the exercise. And as far as I can see,  
3 there's no mention in that note of the other emergency  
4 services. Can you just cast your eye down that and tell  
5 me whether I've got that wrong.  
6 A. No, that's right.  
7 Q. Does that reflect a prioritisation of the armed response  
8 rather than joint working?  
9 A. No, I don't think so. I think the first half of that  
10 page in capitals is a briefing that I was given a couple  
11 of minutes to 11, before the exercise started, just to  
12 let me know in my role — before that, I didn't know  
13 what the exercise, the detail of it was about. So that  
14 in capitals there is about the initial — what's been  
15 rung in, what's happened.  
16 Q. Yes.  
17 A. And then I am then told to wait, not to self-deploy but  
18 to wait as if I'm at home on cover and wait for the FDO  
19 to ring me, accepting the fact that I'm sat in the same  
20 building, but that's part of the exercise.  
21 Q. Yes.  
22 A. And at that point then when I'm updated, I suppose  
23 a little bit of role play in that I say, "The FDO  
24 remains in command and control whilst I'm travelling",  
25 to try and put some reality into the situation because

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1 that's what would happen. And then I think those three  
2 bullet points there are that very immediate response,  
3 I suppose.  
4 SIR JOHN SAUNDERS: It's a strategy, isn't it?  
5 A. It's probably what's been referred to me as, "This is my  
6 initial working strategy, ACC, are you happy to sign it  
7 off," from the FDO, and I probably started to write down  
8 what he said there. Whether or not there were further  
9 references to other emergency services, I don't know,  
10 but that's certainly that very initial response, which  
11 is, as it says there: neutralise the threat, protect and  
12 save life, and minimise the risk.  
13 SIR JOHN SAUNDERS: I'm really sorry to interrupt you  
14 (overspeaking).  
15 Protecting and saving life is bound to be a major  
16 part of your strategy whether the FDO devises it or you  
17 do?  
18 A. Mm—hm.  
19 SIR JOHN SAUNDERS: We know that a significant part of that  
20 strategy went wrong and yet you didn't know? I mean it  
21 seems extraordinary, doesn't it? Does it not seem  
22 extraordinary to you that you knew nothing about a major  
23 part of your strategy on the night just not happening?  
24 A. I think it's really — I do understand your point.  
25 I think it's so difficult to try and explain the... The

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1 FDO and the tactical firearms commanders and the other  
 2 people in Silver would be there, co-located, and having  
 3 discussions and sharing intelligence, getting that  
 4 shared intelligence picture that JESIP talks about.  
 5 I would have expected, had there been that  
 6 significant issue raised within that room, that it would  
 7 have found its way to me. But it didn't. And I can't  
 8 really explain any more about that, really.  
 9 SIR JOHN SAUNDERS: Okay, thank you.  
 10 A. Sorry.  
 11 MR WEATHERBY: Okay. I'm coming on to that, but the point  
 12 I'm making here is that this is your daybook entry and  
 13 it starts with, as you say, what you were told, and your  
 14 strategy. But then as you scroll down to the next page,  
 15 it's a chronology.  
 16 A. Yes.  
 17 Q. As far as I can see, there's no -- correct me if I'm  
 18 wrong, but I can't see any reference to the other blue  
 19 light emergency services. They seem to be completely  
 20 out of your mind as Gold commander.  
 21 A. I think there's reference to the FCP. I think if you  
 22 look at the top of that page, I start kind of almost  
 23 a review of a working strategy, which is perhaps why  
 24 I call it working strategy 1 as opposed to the very  
 25 initial one and I start to write things down. I can

1 only assume then, because there's a typed version, that  
 2 I think to myself, actually typing this might be more  
 3 helpful, and I think then there is reference to partners  
 4 and developing the intelligence picture within that.  
 5 Q. All right, but the reference to the FCP has an  
 6 irrelevant and sensitive redaction, so I'm assuming that  
 7 whoever's reached the FCP is not the blue light services  
 8 that I'm referring to. So that would deal with the FCP  
 9 point.  
 10 A. Mm-hm.  
 11 Q. But I think you're agreeing with me, but please correct  
 12 me if I'm wrong, that there's no reference to ambulance  
 13 or Fire Service or the failure to tell them about Plato,  
 14 the declaration, or anything to do with bringing them  
 15 forward or failing to bring them forward, is there?  
 16 A. There's no reference to any failure or any issues  
 17 because I don't know about them at this point and  
 18 I didn't know about them on the night, so there wouldn't  
 19 be. As I say, I do think that as I've started to write,  
 20 I've stopped writing in bullet point 2 and transferred  
 21 it on to a typed document, which is fuller, that I can  
 22 then send on to people, which does have reference to  
 23 partners and sharing of intelligence from that.  
 24 Q. I'm just dealing with this as your contemporaneous note  
 25 at the time, which I am assuming this is what it is. As

1 Gold commander, presumably you would be interested or  
 2 concerned to know, given that this was an exercise about  
 3 a terrorist attack with nominal casualties, you'd be  
 4 interested to know when the Ambulance Service and the  
 5 Fire and Rescue had actually turned up and how they'd  
 6 interacted with your police officers. That's part of  
 7 your job, isn't it, to supervise that? I understand the  
 8 delegation point, but that's your job to oversee and  
 9 supervise that?  
 10 A. I think that my take on this is that very much at that  
 11 tactical level, the FDO, the TFC, et cetera, the  
 12 ground-assigned, are in the process of doing everything  
 13 that it says in the plan, which includes the FCP, which  
 14 includes telling partners, which includes that shared  
 15 understanding at an FCP. I don't necessarily wait for  
 16 updates as to whether those things are happening because  
 17 there are so many things, they'll go on a log and  
 18 I could check them myself, I suppose, but my focus, once  
 19 I've written that initial Gold strategy, is to turn to  
 20 the police Gold meeting and then, following that on,  
 21 pull all of those partners together in the strategic  
 22 coordination group, which is clearly a time where that  
 23 intelligence can be shared and obviously the importance  
 24 of partners is paramount.  
 25 Q. I understand it's not your job to declare Plato to the

1 partners and I understand it's not your job to call them  
 2 forward and that is delegated to the tactical command  
 3 primarily. But it was your job to make sure that it all  
 4 happened and you were responsible for making it all  
 5 happen, weren't you?  
 6 A. I think in ... I wasn't the person responsible for doing  
 7 it, but the overarching responsibility sits with the  
 8 Gold commander. Had I known there were any issues that  
 9 were raised, if there were on the night, I could have  
 10 done something about that. I wasn't aware of that and  
 11 I think I could have and maybe did check the log at the  
 12 time. I wouldn't expect an update from the FDO or  
 13 anybody in Silver to tell me that each different stage  
 14 was happening. They would just be very busy in getting  
 15 on with what was expected of them.  
 16 Q. But if it was the case that the reason that the  
 17 declaration wasn't made to the other emergency services  
 18 and if it was the case that it fell off the table, that  
 19 others to whom it was delegated simply were overburdened  
 20 and didn't get to it, then it was your job as their  
 21 commander to supervise what they were doing and, on the  
 22 absolute key issues, make sure that that had happened,  
 23 whether by looking at the log, whether by checking with  
 24 them in person, by radio, whatever, but the line of  
 25 command means that the buck stops with you, doesn't it?

1 A. And had I realised that there were any issues, I would  
2 have dealt with those on the night.

3 Q. Yes, absolutely, but the point I am putting to you  
4 is that you obviously didn't realise, but you should  
5 have realised; do you accept that?

6 A. I think for me to realise would have meant that somebody  
7 would have had to raise that with me. I was in  
8 a separate location and nobody did.

9 Q. I think I've taken this as far as I can, but one final  
10 point. As the top of command, it was your job to check,  
11 rather than to wait for somebody to tell you, wasn't it?

12 A. I suppose "yes" is the simple answer to that, but --  
13 "yes" is the simple answer. It's the level of detail of  
14 the different aspects that you expect the tactical and  
15 operational commanders to be getting on with that you've  
16 got time to check as Gold. Everybody's got their own  
17 responsibilities, but yes, I understand your point and  
18 the buck stops with Gold.

19 Q. I notice the time, but I wonder, sir, whether I might  
20 finish the point. I will only be a couple of minutes.  
21 Moving on from that point that both Mr Greaney and  
22 the chair have asked you about and the fact that it  
23 appears not just on the night but through the whole  
24 debriefing process and subsequently, you didn't learn  
25 about the complete failure to declare Plato to the other

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1 emergency services or to bring them forward during  
2 a period when they would obviously have been able to  
3 play a role in saving lives. Would you agree with me as  
4 Gold commander, as somebody involved in the debriefs,  
5 and then subsequently as the head of special operations,  
6 it was completely unacceptable that you did not get to  
7 know about those serious JESIP failures at  
8 Winchester Accord?

9 A. I think I did as much as I could to put myself in  
10 a position by both attending the police and the  
11 multi-agency debrief to pick up, not just the things  
12 that I felt I had to contribute to those debriefs, but  
13 that other people did, and I listened and participated  
14 in both of those. I can't really explain any more than  
15 that.

16 The fact that I didn't know on the night and that it  
17 didn't become apparent to me during those debriefs, I'm  
18 sorry, I can't --

19 Q. Let's put aside whether it was your fault or a failure  
20 somewhere else. Do you agree with me that it was an  
21 unacceptable failure that you as Gold commander of the  
22 night, as a senior officer taking part in the debriefs,  
23 and then as the head of special operations from  
24 1 October, when these points were still very relevant,  
25 as indeed they were on 22 May 2017, that something had

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1 gone terribly wrong with the system and that you were  
2 apparently in the dark about those failures?

3 A. It certainly would have assisted had I known that,  
4 absolutely.

5 Q. And is the real answer to this that the failure to  
6 engage and work jointly with the other emergency  
7 services in Winchester Accord was because GMP  
8 corporately took its eye off the ball because it was  
9 concentrating on neutralising the terrorist threat  
10 rather than engaging with its partners?

11 A. I don't think that is a fair comment to make. I think  
12 clearly, in those first few minutes, that very important  
13 aspect that the force duty officer has to deal with is  
14 neutralising the threat. That's absolutely appropriate  
15 and what would be expected. I can't comment on what  
16 happened on the ground because I wasn't there. But what  
17 I can comment on is that certainly, from my perspective,  
18 I had partners engaged as soon as I could and there were  
19 a variety of partners. I can't name exactly who and  
20 from what area sat at my SCG in the early hours of the  
21 morning. From my point of view, partnership working was  
22 important on that morning in the exercise.

23 MR WEATHERBY: Okay. I'm not going to take the point any  
24 further.  
25 Is that a convenient moment, sir?

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1 SIR JOHN SAUNDERS: Yes, it is. I just want to --  
2 a slightly different angle. I've explained how I find  
3 it extraordinary you didn't know anything about it.  
4 Perhaps it's the difficulty of actually making these  
5 sort of exercises realistic. So let's suppose this was  
6 a real event and you are summoned from your home knowing  
7 there are a large number of casualties who need to be  
8 rescued from a bomb site. And you're called in, and  
9 okay, you have to think of future things, but on your  
10 mind is the dreadful news that there are these injured  
11 people. Do you not think, if that was real life, you  
12 would have at least asked, "Have they got the casualties  
13 out?" at some stage.

14 A. Yes, I'm sure I would and certainly after reading and  
15 listening to the evidence, of course, absolutely.

16 SIR JOHN SAUNDERS: Okay. An hour? Thank you.  
17 (1.06 pm)  
18 (The lunch adjournment)  
19 (2.06 pm)

20 SIR JOHN SAUNDERS: Mr Weatherby, thank you.  
21 MR WEATHERBY: Thank you very much.  
22 Ms Hankinson, I'm going to ask you some further  
23 questions about the lead-up to the HMIC FRS visit and  
24 what happened subsequently. As Mr Greaney's covered so  
25 much of it, it won't take me very long, I hope.

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1 Can I start by going to the email that Mr Greaney  
2 took you to, which is of 14 October, and that is  
3 {INQ041071/1}, please. Can you see that?  
4 A. Yes.  
5 Q. I think this is the original notification to you that  
6 the inspection was going to occur just over 2 weeks  
7 later; is that right?  
8 A. Yes, that's right.  
9 Q. The point I want to take you to that I don't think you  
10 were taken to before is four lines from the bottom of  
11 that page:  
12 "There is no requirement for forces to conduct  
13 self-assessment prior to the arrival of the inspection  
14 team."  
15 So you've already helped us by saying that the  
16 purpose of the inspection was to look at command and  
17 control preparedness in the initial stages of  
18 a terrorist attack; is that right?  
19 A. Yes.  
20 Q. So can you help us with why the Inspectorate is saying  
21 there's no need to conduct a self-assessment? You may  
22 not be able to.  
23 A. I can't, sorry. I think that's an instruction from  
24 them.  
25 Q. Yes, it is. Okay. Can I suggest to you then that

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1 that's because the Inspectorate is interested in looking  
2 at what is in existence perhaps rather than what should  
3 be there?  
4 A. Yes, albeit HMIC do sometimes ask us to do  
5 self-assessments on particular things before they  
6 arrive. I don't think that's unusual. But yes, I agree  
7 with what you're saying.  
8 Q. If they'd asked you to do a self-assessment, it might be  
9 to point you in the direction of various matters, but on  
10 the other hand the fact that they're saying you don't  
11 need to do one would be an indication that they're  
12 looking what is in existence; yes?  
13 A. Yes.  
14 Q. I'm not suggesting, let me make it quite clear, that  
15 there was anything wrong in you using the 2 weeks or  
16 slightly more in advance, first of all, to prepare for  
17 the inspection or indeed to pick up any problems that  
18 you saw; okay?  
19 A. Yes.  
20 Q. But would you agree with me that as a general  
21 proposition, picking up problems that were there ought  
22 to themselves have been brought to the attention of the  
23 Inspectorate?  
24 A. I'm not sure what you're referring to, sorry.  
25 Q. Okay. We'll come on to it in a bit, but you've already

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1 been taken to the Plato plans which you were told by  
2 Inspector Roby were out of date, and you caused them to  
3 be reviewed. No problem, no criticism of you for doing  
4 that. But what I'm suggesting to you is that having  
5 realised that they hadn't been reviewed when they should  
6 have been in 2015, asking for them to be brought up to  
7 date was one thing, but you ought to have told the  
8 Inspectorate, who were coming in to look at GMP's  
9 command and control preparedness, that in fact this --  
10 although you tried to rectify it, it had been out of  
11 date.  
12 A. Sorry, I follow what you're saying now, apologise,  
13 I wasn't following you before. Yes, I take your point.  
14 I think from my point of view, there was no secrecy  
15 about this at all. It was and it is a regular thing  
16 that policies are reviewed, whichever -- whether HMIC  
17 had looked at version 4 and 5 or just 5, they would have  
18 seen quite clearly in that first page the reference to  
19 a gap between the review and that it had only just been  
20 reviewed. So very open about that.  
21 As I say, very minimal in terms of the difference  
22 between those two plans. It wouldn't be something --  
23 a review like that wouldn't be something that I would  
24 necessarily tell HMIC about, even now, to be honest.  
25 Q. Okay. A number of things from that. First of all, I'll

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1 deal with whether the plan at that point, the Plato plan  
2 at that point, was fully appropriate. I'll deal with  
3 that with another witness. You're right, of course, the  
4 difference between version 4 and version 5 was on one  
5 view fairly small.  
6 The fact that the plans had not been revised until  
7 the Inspectorate were knocking at the door was itself  
8 highly relevant to the inspection, wasn't it?  
9 A. I'm not sure it was relevant to the inspection given how  
10 minimal those reviews are. This wasn't an overhaul of  
11 a plan, which I think would have borne more relevance.  
12 So I think plans get reviewed all of the time, I think  
13 what it does flag is the fact that reviews were missed,  
14 I think it flags, as opposed to it having particular  
15 relevance to this inspection --  
16 Q. That's the point, because obviously the Inspectorate  
17 would be interested in the plan, but presumably they'd  
18 be interested in the review system and the management of  
19 the way that plans were reviewed and revised or not;  
20 yes?  
21 A. Yes.  
22 Q. So there's a distinction, isn't there, between preparing  
23 for an inspection to make it look -- making the position  
24 look better than it was to preparing for an inspection  
25 and bringing things up to date, but actually proactively

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1 telling the Inspectorate of the problems that you'd come  
 2 across in that two-week preparation period?  
 3 A. Yes, there is a difference.  
 4 Q. And did you do that?  
 5 A. I didn't tell the Inspectorate that there'd been  
 6 a missed review. I don't think it even occurred to me.  
 7 I think the review was done on my request when I picked  
 8 it up. Obviously, the missed review was prior to me  
 9 taking over. As I say, the changes were minimal, it  
 10 didn't even occur to me.  
 11 SIR JOHN SAUNDERS: Do you mind if I ask something? It was  
 12 done in an awful rush.  
 13 A. Mm—hm.  
 14 SIR JOHN SAUNDERS: And it was done in an awful rush because  
 15 of HMIC coming?  
 16 A. Yes.  
 17 SIR JOHN SAUNDERS: Would it have been better just to say,  
 18 "We've missed it", but actually do it with proper time  
 19 to do it?  
 20 A. I don't think it was. I know I've just said yes when  
 21 you asked me the question.  
 22 SIR JOHN SAUNDERS: I think that's the evidence we've had,  
 23 really.  
 24 A. I have heard what Mr Giladi has said. I don't consider  
 25 that to have been done in a rush. I think if it had

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1 been an overhaul of a big plan, of course it would have  
 2 needed more time, absolutely it would. But for me,  
 3 a review, a yearly review, as I said earlier on,  
 4 sometimes necessitates no change whatsoever, sometimes  
 5 minimal change. If Leor had come back to me and said,  
 6 "Look, there's quite significant things we need to  
 7 change here", I wouldn't have said to him then, "I don't  
 8 care, HMIC are coming, make it look the best you can",  
 9 of course I wouldn't. I think Leor sent it me back the  
 10 day after, or within 36 hours anyway, with an email to  
 11 suggest that he had reviewed it and, as I say, whether  
 12 I looked at it at the time, but certainly looking at it  
 13 afterwards there were minimal changes that were needed,  
 14 so I wouldn't have thought it would have taken a huge  
 15 amount of time to do, so I don't think he would have had  
 16 to do it in a rush. That would be my view.  
 17 SIR JOHN SAUNDERS: Thank you. Mr Weatherby.  
 18 MR WEATHERBY: Picking up on that, at the time it was  
 19 a Sunday that you emailed Mr O'Hare and Mr Giladi asking  
 20 one of them if they would review it before the Tuesday  
 21 which is when the Inspectorate were coming in.  
 22 Mr Giladi did it on the Monday, so it was a very  
 23 quick turn around. I don't want to get bogged down into  
 24 how effective that review was, but there were errors in  
 25 it and potentially the result of it wasn't as good as it

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1 might have been. We'll deal with that, as I say, with a  
 2 different witness.  
 3 But you didn't know, did you, when you asked for it  
 4 to be reviewed, whether it needed very little change or  
 5 whether it needed a major overhaul, did you?  
 6 A. I didn't, but I think the suggestion of a policy being  
 7 reviewed in my mind is generally minimal changes to  
 8 update perhaps pieces of legislation or the letter as  
 9 referred to. But no, in answer to your question,  
 10 I didn't know at that time whether it needed a bigger  
 11 overhaul or not.  
 12 Q. Okay. As I say, I will come back to that in a little  
 13 bit. The point I was making was in fact in those  
 14 2 weeks, or just over 2 weeks, to your credit, you did  
 15 take quite a number of actions and had quite a number of  
 16 meetings with people under your command in anticipation  
 17 of the inspection, didn't you?  
 18 A. Apologies, was that a question?  
 19 SIR JOHN SAUNDERS: You can tell from when the voice goes up  
 20 at the end of the question.  
 21 A. Apologies, I must have been having a drink at the time,  
 22 I apologise.  
 23 Yes, I did have a number of meetings in preparation  
 24 for that.  
 25 MR WEATHERBY: Again, to your credit, you have set it out

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1 quite fully in your statement so unless anyone requires  
 2 me to do so I'm not going to go through it in any detail  
 3 but I want to pick out a few points. I want to make  
 4 a point here and I want you to give me your comment on  
 5 it: through the preparation you did for the  
 6 Inspectorate, there was very little emphasis on JESIP or  
 7 the multi-agency emergency services' response? Is that  
 8 right, would you agree with that?  
 9 A. Yes, I think the majority of people that I met with were  
 10 police officers. I suppose they were coming in to look  
 11 at the police response in that first 4 hours and that's  
 12 where my concentration lay.  
 13 Q. Yes. And of course that would be consistent with the  
 14 evidence you have already given that you weren't up  
 15 with — you hadn't been told or you hadn't found out  
 16 about the JESIP failures that you've been asked about  
 17 this morning.  
 18 A. Yes.  
 19 Q. Now, again, just for completeness, I'm not going to  
 20 suggest there was no mention of JESIP, in fact I am  
 21 going to turn to a couple of references, I just want to  
 22 make that clear.  
 23 Can I take you now to your daybook. It's a point  
 24 that you were taken to this morning but I'm afraid  
 25 I didn't fully understand your answer, even if others

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1 might have done.  
 2 Mr Lopez, could we have {INQ041074/5-8} up, please.  
 3 It's pages 5 to 8 I'm going to refer to, and just while  
 4 you're doing that, Mr Lopez, Ms Hankinson, I'm going to  
 5 refer to the meeting of 20 October.  
 6 A. Okay.  
 7 Q. {INQ041074/5}, please. This is your note of that  
 8 meeting. Can I start by asking, this appears to be  
 9 a preparation meeting with members of your team, people  
 10 under your command, for the purposes of the Inspectorate  
 11 coming in. Would this have been the main meeting that  
 12 you conducted in that period before they came in?  
 13 A. Could I just take one moment to go back to the point in  
 14 my statement, please?  
 15 Q. Of course. It's paragraph 23.  
 16 A. (Pause). Yes, okay. I think this is why I queried this  
 17 morning when Mr Greaney asked me a question. That bit  
 18 at the top there would appear to be then followed by  
 19 a number of actions after that and then over the page is  
 20 another meeting, SLF, and followed by that I have a 3 pm  
 21 CT command and control meeting. So I think that's where  
 22 the actual meeting starts to prepare for the CT, if you  
 23 like, the 3 o'clock meeting.  
 24 Q. I see. Okay. That's helpful. Can you remember, you  
 25 may not be able to, but can you remember who was there

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1 or how many people were there?  
 2 A. No, I can't, but I'm sure the diary entry would tell us  
 3 that. I don't have it in front of me.  
 4 Q. All right. You were asked -- can I start with page 6,  
 5 please, the bottom of page 6 {INQ041074/6}. You were  
 6 asked about this this morning and this is the point  
 7 I didn't quite follow. In the course of this meeting  
 8 you have looked at:  
 9 "Initial call, declare Plato."  
 10 And then here at the bottom, the last line.  
 11 "TFC goes to [arrow] sit next to the FDO/HQ."  
 12 This is a point, isn't it, that arises from the  
 13 location or the consideration over 7 or 8 years of  
 14 moving the FDO?  
 15 A. I don't think this point here is in reference to that.  
 16 I suppose there is a wider point about the FDO move, but  
 17 that's certainly not what this is about.  
 18 Q. Right. Can you help us then again, what is this about?  
 19 A. Okay, so I know I keep saying this but this is my  
 20 inference that I'm drawing from my notes as opposed to  
 21 something that I can remember from a meeting. I think  
 22 it looks as though we're kind of almost going through a  
 23 chronology in the meeting: okay, so after the initial  
 24 call the demand will increase, this is how the 9s get  
 25 dealt with, we divert things, talking about Talk Groups,

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1 et cetera.  
 2 Then we go -- initially the FDO, who would be the  
 3 initial TFC at that point, would declare Plato and  
 4 I probably just started to jot down some other things  
 5 the FDO would do. They would nominate cadre -- and when  
 6 I say cadre I mean the duty TFC because they are the  
 7 ITFC. They would think about drawing in mutual aid.  
 8 They would give the advice about Stay Safe and no  
 9 point-to-point, et cetera.  
 10 I think the reference I am making there is then the  
 11 TFC, so the nominated cadre TFC, has a decision to make  
 12 then about whether they come and there's no -- my  
 13 understanding there's no right or wrong with this,  
 14 whether they then come and sit next to the FDO at  
 15 Clayton Brook, or wherever the FDO is, or whether  
 16 already the process of the Silver room at HQ is being  
 17 set up and it makes sense for them to go there and take  
 18 command and control. So it's a judgement call and  
 19 I think that is very much based upon probably -- if it's  
 20 during the day and that person's at HQ already, they  
 21 will perhaps stay there and stay in the Silver room. If  
 22 they're coming in from home they might make a judgement  
 23 call about where they're best placed. So I think that's  
 24 what line is about. Have I helped to clarify that?  
 25 Q. That's very helpful. But is it a judgement call or are

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1 you basically here highlighting (inaudible: distorted)  
 2 problem within GMP because the FDO is separated or  
 3 divorced from HQ?  
 4 A. No, I don't think... My understanding of the purpose of  
 5 the move was not necessarily to resolve this as  
 6 a problem. I might be wrong in this, but my view  
 7 is that it is a judgement call about where is the best  
 8 place to go to be in a position to take that command  
 9 and control off the ITFC, who is and clearly will be  
 10 very busy at that time.  
 11 Q. Yes. The unresolved problem is that it's more difficult  
 12 for the cadre TFC to take over from the FDO if they're  
 13 not in the same location, but it's more difficult for  
 14 the cadre TFC to be the cadre TFC anywhere but HQ  
 15 because they're not then part of the command structure,  
 16 or not located within the command structure; yes?  
 17 A. Yes, I agree with both of those points. So yes, the  
 18 proposed move of the FDO would seek to resolve that,  
 19 that's right.  
 20 Q. Yes. So what is actually being discussed here is this  
 21 unresolved problem of the separation of the FDO from HQ,  
 22 something which ought to have been sorted out?  
 23 A. I think it certainly bears reference to that. That's  
 24 not what I was trying to describe, I don't think,  
 25 in that sentence.

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1 Q. That's helpful, but just going on from that, in your  
2 tenure of 7 months, what did you do in terms of  
3 promoting or advancing the move of the FDO to HQ?  
4 A. I think some of this is referenced in my statement so  
5 I don't know the exact dates, but we can go to that if  
6 you need to. But I certainly had made proactive  
7 enquiries initially about where the move was up to;  
8 I think that was some time in October. I then think  
9 I followed a couple of meetings that are present in my  
10 diary but I don't necessarily think have been referenced  
11 from my daybook with John O'Hare and I think it was  
12 Leon Jacobs at the time who was also doing some work on  
13 it. He was a superintendent at the time.  
14 I then brought a paper to COG in the April time,  
15 I made enquiries with estates and IT colleagues in the  
16 March before that paper went to COG to find out what  
17 some of the barriers to some of the moves were because  
18 these weren't easy things to make happen.  
19 Q. Yes.  
20 A. Then prior to leaving GMP, I had, as a result of the COG  
21 meeting, I believe, been asked to develop a terms of  
22 reference for moving it forward, which I passed over to  
23 my successor.  
24 Q. Okay. So rolling that all up together, you were very  
25 concerned to resolve this issue and were pushing for it

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1 to happen?  
2 A. I don't think it's right to say that I was very  
3 concerned about any particular issue. I think it was  
4 something that I'd been aware of for a while. I knew  
5 that it would come under my responsibility when I took  
6 over the temporary ACC role, and I progressed it as much  
7 as I could whilst I was in that role.  
8 Q. The problem or the judgement call, as you favour it,  
9 that we just looked at is something that needed  
10 resolving and that was something that would be resolved  
11 by co-locating the FDO at HQ, wouldn't it?  
12 A. That issue of which place to go to would have been  
13 resolved, yes.  
14 Q. And that was something that was actively being exercised  
15 and tested at Winchester Accord more than a year before  
16 the bombing?  
17 A. That was one of the local things that was tested at  
18 Winchester Accord. That's my understanding, yes.  
19 Q. Can we just go over the page, Mr Lopez, please,  
20 {INQ041074/7}. Slightly different point. The top of  
21 the next page shows the TFC, and I guess we can assume  
22 that that's the cadre TFC --  
23 A. Yes.  
24 Q. -- wherever they're actually located. Then you have  
25 a map or a diagram showing three other TFCs, presumably

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1 all (inaudible: distorted) possibility of a Plato being  
2 multi-sited and therefore one central TFC and a number  
3 of ground-assigned TFCs at the locations.  
4 A. That's correct, yes.  
5 Q. Then just this. To the right is "and JESIP partners".  
6 This is one of the few references I have found in the  
7 documents you have referred to in your statement where  
8 JESIP or JESIP partners is referred to. What's the  
9 reference there meant to indicate?  
10 A. That the ground-assigned TFC would be at the FCP as  
11 would JESIP partners.  
12 Q. I see. So the reference in this (overspeaking) --  
13 A. Whether that is three times over or just once -- sorry.  
14 Q. So the reference in this meeting that you're making  
15 a note of is the reference that JESIP partners would be  
16 or should be at the FCP?  
17 A. Yes, alongside the ground-assigned TFC.  
18 Q. Yes, indeed. That's helpful. Then just for  
19 completeness, further down that page, there's access to  
20 Airwaves and mapping assets. Were those issues that  
21 were raised as potential problems with you in this  
22 meeting, can you recall?  
23 A. I can't recall. I don't think they were raised as  
24 particular issues. I think I would have actioned them  
25 with an A and a circle if I'd thought I needed to follow

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1 up anything from that, so I haven't, so I can't recall.  
2 Q. Okay. So looking at this note of this meeting, by all  
3 means have a better look at it, but as far as I can see,  
4 and can you help us with this, the only reference to  
5 joint working or JESIP is the one that we've just  
6 discussed about, "and JESIP partners", effectively  
7 at the FCP?  
8 A. I think in relation to ambulance and fire, yes, that's  
9 obviously reference to other partners and joint working  
10 on there, but ambulance and fire, the references to  
11 JESIP at the top, yes.  
12 Q. Okay. Thank you, Mr Lopez, we can take that down.  
13 Then in paragraph 25 of your statement, you had  
14 a meeting on 24 October with Mr Sugden regarding the  
15 fusion cell and CTPOR, the Counter-terrorism Operations  
16 Room.  
17 A. Yes.  
18 Q. There's a reference on there to an FDO drop-down menu  
19 and in your statement you indicate with the passage of  
20 time that you can't recall what that was a reference to,  
21 yes?  
22 A. Yes.  
23 Q. A drop-down menu in this context would be a prompt,  
24 wouldn't it?  
25 A. Yes, and on reviewing other documents in preparation and

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1 listening to evidence, I think it's the system on  
 2 Sherlock that drops down, so yes, I understand what that  
 3 refers to.  
 4 Q. Right.  
 5 A. I understood the drop—down menu aspect of it. I didn't  
 6 understand what it referred to in the context of that —  
 7 is it a daybook entry, that, I think?  
 8 Q. Okay. Well, it's a reference to the meeting with  
 9 Mr Sugden, yes. I can take you to that if it helps.  
 10 The only point I really want to make is: am I right that  
 11 this is a discussion mainly about other things, but you  
 12 touch on the FDO because the FDO is a continuous  
 13 reference point in the whole of this issue about command  
 14 and control in the initial stages, of course, because he  
 15 or she is at the centre of it? But the reference to  
 16 a drop—down menu is a reference to prompting the FDO,  
 17 yes?  
 18 A. I would say yes, but I would ask perhaps if I can have a  
 19 look at it on the screen, if that's okay. I know it was  
 20 part of my daybook, I remember that, but I can't  
 21 remember it in detail.  
 22 Q. No problem. {INQ041074/10}. We probably have to go to  
 23 {INQ041074/9} just to get the context.  
 24 A. Yes.  
 25 Q. Does that help?

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1 A. Yes, if you could just tick over the page for me if  
 2 that's all right {INQ041074/10}. Yes, okay, I think —  
 3 I suppose what I'm — I understand the context of  
 4 a drop—down menu and the use of that within the OCB.  
 5 I think the part that I'm referencing, I can't recall  
 6 what that refers to, is what the drop—down menu would  
 7 say. I assume it's connected to this meeting. It's to  
 8 do with activating some part of what we've been talking  
 9 about.  
 10 Q. I'm not concerned to ask you about that and I suspect  
 11 I shouldn't. The point is that this is a reference to  
 12 helping the FDO and thereby a reference that the FDO  
 13 needs help with things like prompts and drop—down menus;  
 14 yes?  
 15 A. Yes. I reference that for a vast number of things, the  
 16 FDO and the staff within the OCB have the drop—down  
 17 menus on Sherlock for many, many, many different things  
 18 as prompts, yes, that's right.  
 19 Q. Okay. Final topic. I want to refer to the reviews of  
 20 the Plato plans, and I mean plural here. I want to ask  
 21 you a couple more questions before I finish on that.  
 22 Paragraph 29 of your statement. That's the  
 23 reference to the email to Mr O'Hare and Mr Giladi about  
 24 reviewing SOP 47, version 4, on 30 October.  
 25 In fact, the email thread has the reference to

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1 Inspector Roby bringing to your attention on 27 October  
 2 the fact that the plan hadn't been reviewed, so that is  
 3 consistent with the evidence you've already given, so  
 4 I don't think I need to take you to that.  
 5 Just reminding ourselves here, this is a plan that  
 6 deals with the immediate deployment of armed officers to  
 7 a terrorist incident where they will be authorised to  
 8 shoot to kill, isn't it?  
 9 A. I suppose just to be careful with the terminology, it  
 10 definitely — it deals with, yes, the deployment of  
 11 officers to neutralise the threat posed by the  
 12 particular marauding terrorist attack, yes.  
 13 Q. Yes. I put it in those terms just to make a stark  
 14 point. This isn't just a fact that this is another  
 15 policy which has just escaped a review: this is a policy  
 16 which deals with the use of lethal force and it's really  
 17 not good enough, is it, that it wasn't reviewed, not  
 18 your fault, you weren't in place at the time, but it  
 19 wasn't good enough, was it, that it was simply not  
 20 reviewed and then only picked up by Inspector Roby,  
 21 apparently, a few days before the Inspectorate came in  
 22 to have a look?  
 23 A. I agree that it should have been reviewed when it needed  
 24 to be, yes.  
 25 Q. And then indeed, I think Mr Greaney already made this

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1 point but it's worth labouring, I think, that on  
 2 10 August, the National Armed Policing Guidance had come  
 3 through to GMP. Would you agree that ought to have  
 4 prompted a review of this plan?  
 5 A. Yes, I do think that Mr Giladi sent out an email when  
 6 that came out, which I've had sight of, I think, within  
 7 the evidence, albeit not in my bundle. So I know that  
 8 Mr Giladi picked up on that and sent it to the relevant  
 9 people.  
 10 Q. Yes, but the point I'm making is that that ought to have  
 11 prompted a review of the Plato plan, which had been —  
 12 the review of which had been missed in 2015?  
 13 A. Ideally, yes.  
 14 Q. It's not ideally, is it? This is a lethal force policy  
 15 which had somehow missed its review and then it missed  
 16 a second prompt with this national guidance coming  
 17 through in August. It's not a matter of ideally, this  
 18 is just unacceptable, isn't it?  
 19 A. Yes, it should have been reviewed.  
 20 Q. This lack, first of all, of a review in 2015 and,  
 21 secondly, a lack of review once the August guidance came  
 22 through, was that made clear to HMIC?  
 23 A. It wasn't made clear to HMIC by me, but I think just to  
 24 be really clear, that was not — I think that is because  
 25 it didn't occur to me, not because I think there was any

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1 reason not to. I would have been very happy to say to  
 2 HMIC, "I've picked up the fact that this hasn't been  
 3 reviewed in August or 2015, I've caused that to happen,  
 4 please feel free, there's version 4, there's version 5".  
 5 I would have been — it didn't occur to me to do that.  
 6 Q. Of course, it is to your credit that you caused the  
 7 review to happen, but it was relevant to the  
 8 Inspectorate that the Greater Manchester Police systems  
 9 had left a policy which or a plan that dealt with lethal  
 10 force unreviewed and then unreviewed again when it  
 11 should have been prompted by the national guidance; yes?  
 12 A. Yes.  
 13 Q. Once that had been reviewed, and you got it on the  
 14 31st by Mr Giladi, was the new version sent out to  
 15 firearms commanders and FDOs? Is there an audit trail  
 16 of it being reviewed and a direction that the previous  
 17 version had been superseded?  
 18 A. I don't know the answer to that. It wouldn't need an  
 19 audit trail in terms of — that type of review was done  
 20 by the reviewing officer, which was the superintendent  
 21 in charge of firearms policy. And once that review had  
 22 been done, obviously if there were any very significant  
 23 changes, I would have expected it to come back to the  
 24 firearms policy group, for example, but given that it  
 25 was a standard review with minimal changes, that would

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1 have been done by Superintendent Giladi and I anticipate  
 2 he would have sent that out to people who needed to  
 3 know, but I couldn't clarify that for you, sorry.  
 4 Q. Okay. Can you recall, was there a robust system within  
 5 Greater Manchester Police of approval of policies and  
 6 plans of disseminating them or making clear to everybody  
 7 which plan had been superseded and which was in force at  
 8 any particular time?  
 9 A. I can't describe whether I'd ever seen anything written  
 10 down as such. I think from my experience, I understood  
 11 that there was a governance process to follow, whether  
 12 that was for a change paper or whether it was for  
 13 a firearms policy, where a more significant change to  
 14 policy would have gone then through the governance of  
 15 either the firearms policy group or the north west  
 16 regional group.  
 17 Q. Obviously once a plan is instituted or a new version is  
 18 promulgated, then there has to be consideration of  
 19 whether the changes required training and whether  
 20 perhaps a CPD update — that should be part of the  
 21 process, shouldn't it? There should be a clear,  
 22 transparent audited process, most particularly for plans  
 23 and policies which deal with lethal force and the  
 24 deployment of armed officers and decisive action and  
 25 also trigger a multi-agency response?

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1 A. Yes, and there may well have been, but I can't bring it  
 2 to mind or give you evidence of it just at this moment.  
 3 Q. No. It's entirely possible that I've missed it in the  
 4 rather large amount of disclosure we've had, and I'll be  
 5 corrected if I'm wrong, but I'm not aware of any  
 6 approval document for version 5 or indeed of the system  
 7 that I've just been putting to you. But I'll be  
 8 corrected on that if I'm wrong. But there should be,  
 9 shouldn't there?  
 10 A. There should be a process in place whereby policies are  
 11 reviewed at the time they should be reviewed and then  
 12 any trainings considered, yes.  
 13 Q. And if there was such a process with proper  
 14 documentation, then a commander who wants in quick time  
 15 to remind him or herself of which policy or plan is in  
 16 place can then check and make sure they're operating the  
 17 right policy; yes?  
 18 A. Yes.  
 19 Q. Finally, moving forward to March, and paragraph 50 of  
 20 your statement, you tasked Mr O'Hare to update the Plato  
 21 plan following again more national guidance on 24 March;  
 22 yes?  
 23 A. Yes.  
 24 Q. And that happened to be the day after the  
 25 Westminster Bridge attack. And the email followed

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1 a letter from Chief Constable Habgood, the national  
 2 Protect lead for the National Police Chiefs' Council,  
 3 which referred to the necessity for updating Plato plans  
 4 to be treated as "a matter of urgency"; yes?  
 5 A. Yes.  
 6 Q. Again, from the evidence, it seems that not much  
 7 happened to review the plans in Greater Manchester  
 8 Police for over a month, and then when the plan was  
 9 revised and the new version of the plan drafted, and it  
 10 was emailed out, your evidence is that you were unaware  
 11 of it, even though you were still at that point the ACC  
 12 for special ops?  
 13 A. I think my evidence is that I can't recall having  
 14 received it, I think. But yes, I think that's right.  
 15 I don't recall having received that email or opened the  
 16 documents but I clearly did receive it.  
 17 Q. (Overspeaking) robust transparent process and system in  
 18 place for what was arguably a significant change this  
 19 time, then you as the senior officer responsible for  
 20 this part of Greater Manchester Police, first of all, it  
 21 wasn't done as a matter of urgency and, secondly, it  
 22 appears that you weren't properly involved in knowing  
 23 about it when it was in fact produced; is that fair?  
 24 A. I think my understanding was that I had tasked both the  
 25 letter on 23 or 24 March and 6 April. I knew that there

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1 was an instruction to contact Chief Inspector Nutter and  
 2 to attend at some mid-May seminars which I understood to  
 3 be going on in the background at the same time as a  
 4 planner in the X department, spec ops, would have been  
 5 reviewing our plan, which would have been reviewed  
 6 against that national guidance that had been sent out.  
 7 So in my mind, all of that was ongoing in the  
 8 background.

9 This email came out and was — I think would be sent  
 10 out on an annual basis, an email similar to this, by the  
 11 firearms training team, to say, "This is what the kind  
 12 of dates are for this year, book on to one, and here's  
 13 some documentation to read before you come, this is what  
 14 we're going to be discussing this year".

15 Q. Okay. I'm not going to take it much further, but as the  
 16 ACC in charge, you get the email, saying that plans  
 17 should be revised as a matter of urgency, and then  
 18 it isn't done as a matter of urgency and although you're  
 19 responsible for it, you're not making it happen?

20 A. I think that I — the tasking that I've given to the  
 21 people that are responsible are doing what's required in  
 22 terms of the review of the plan and I think attended the  
 23 seminars that they were asked to do and obviously the  
 24 plan then needed to be pulled together for those  
 25 assurance visits that were coming in the summer.

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1 Q. Okay. At the point you left Greater Manchester Police,  
 2 4 days before the bombing, and responsible for the Plato  
 3 plan, are you able to tell us which of the Plato plans  
 4 was in force at that time? Was it the Giladi plan from  
 5 31 October or was it what was known as the Whittle plan,  
 6 5 May, sent out on the email of 12 May? Can you help us  
 7 with that?

8 A. Having looked at both plans and email trains (sic)  
 9 I would suggest that the version 5 plan was the one that  
 10 was signed off and in place at that point.

11 Q. Yes. You would suggest. Is it clear and unequivocal?  
 12 Is there a proper robust system that makes it clear to  
 13 those that need to know which plan to operate which is  
 14 in force at that time?

15 A. I don't think it is clear, no, because of the draft plan  
 16 that is sent out on 12 May with the new guidance.

17 MR WEATHERBY: Thank you very much. Those are my questions.

18 SIR JOHN SAUNDERS: Thank you, Mr Weatherby.  
 19 Just on that issue, you're aware of the evidence  
 20 we've had that some fairly senior officers thought the  
 21 new plan was in operation, and some equally senior  
 22 officers believed the old one was in operation, so it  
 23 doesn't sound like it was very clear?

24 A. No, I agree.

25 MR GREANEY: And indeed Mr Dexter told us that he was having

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1 regard to both plans on the night.

2 SIR JOHN SAUNDERS: Thank you.

3 MR GREANEY: Sir, finally, Mr Horwell on behalf of Greater  
 4 Manchester Police.

5 Questions from MR HORWELL

6 SIR JOHN SAUNDERS: Thank you, Mr Horwell.

7 MR HORWELL: You have well overrun your allocated time  
 8 and —

9 SIR JOHN SAUNDERS: That's not your fault.

10 MR HORWELL: I'm not going to help matters, I'm afraid,  
 11 because there's quite a lot to cover, quite a lot that  
 12 you haven't been asked about and that is what at times  
 13 I will come to.

14 Let's start with Winchester Accord. You obviously  
 15 bring to this inquiry a number of advantages. You had  
 16 been an FDO. On the first night of Winchester Accord  
 17 you were involved in the exercise as Gold commander?

18 A. Yes.

19 Q. You were actively involved in the two debriefs?

20 A. Yes.

21 Q. We can see your name on the first page of each of them.  
 22 And you went on to be temporary ACC of specialist  
 23 operations?

24 A. Yes.

25 Q. On the first night of Winchester Accord, as I understand

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1 it, you were involved in the SCC?

2 A. The testing of the draft SCC plan. I was actually  
 3 involved in the SCG, pulling together the SCG.

4 Q. Which would have been within the SCC, is that how the  
 5 two are connected?

6 A. Yes, it was a group that would sit within the strategic  
 7 coordination centre, yes.

8 Q. And you were meant to be coming from home. We all  
 9 understand you're based at force headquarters, but as  
 10 part of the live play, you were meant to be coming from  
 11 home. Can you remember now roughly when you were meant  
 12 to arrive at force headquarters and therefore start your  
 13 active role as Gold commander?

14 A. I can't honestly remember, no. I was waiting for the  
 15 FDO to ring me to tell me that something had happened  
 16 and then obviously I would set off.

17 Q. You got the call and then pretended, as it were, to come  
 18 in from home?

19 A. Yes.

20 Q. And start your work at force headquarters?

21 A. Yes.

22 Q. The more important question is this one: can you  
 23 remember whether fire and ambulance were present when  
 24 you started your work, and if not, how long they took to  
 25 be with you in the strategic coordination centre?

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1 A. I really can't. I am making an assumption that fire and  
2 ambulance were at that SCG, and I'm sure they were, but  
3 I haven't got anything written down to tell me exactly  
4 who took part. It was a meeting of probably around  
5 about 20 people, if I remember correctly.  
6 Q. I think you have been asked this already, forgive me if  
7 you have, but can you remember when the SCG took place?  
8 A. I think it was around about 02.20, I think there's  
9 a reference to it in one of my day books actually.  
10 02.25 I think I put maybe.  
11 Q. Were representatives from the other emergency services  
12 there before the SCG was held?  
13 A. Yes, because they were present in the room. I don't  
14 think anybody dialled in, as it were. I might be wrong.  
15 But yes, the majority of people were in the room, albeit  
16 I can't remember exactly who.  
17 Q. And none of the emergency services brought to your  
18 attention that there had been a problem?  
19 A. Not that I can recall.  
20 Q. As for the debriefs, you were involved in the 16 May  
21 debrief and the 23 May debrief.  
22 On 23 May, that was a multi-agency debrief, fire and  
23 ambulance were represented.  
24 A. Yes. I don't know for definite --  
25 Q. Take it from me, it's on the first page.

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1 A. Okay.  
2 Q. Were any major issues raised at either of those two  
3 debriefs?  
4 A. Again, not that I can remember, and I don't think  
5 there's anything that's evidenced within the notes that  
6 suggests that either.  
7 Q. Did anyone at either debrief say that the FDO had been  
8 overwhelmed?  
9 A. Not that I can recall.  
10 Q. Did anyone at either debrief say that there is a danger  
11 that the FDO might be overwhelmed?  
12 A. No, I don't think anybody used those words. I think  
13 there are a couple of references to if the FDO line is  
14 busy, there's perhaps a need for a second line, that  
15 might help. I think that's perhaps a matter of fact as  
16 opposed to the fact that somebody is overwhelmed.  
17 Q. As we know, that led to the FDS's telephone number being  
18 identified. As for any observation on the performance  
19 of the FDO, would you expect the person best placed to  
20 be the FDO umpire during that exercise?  
21 A. Yes and/or the people sat around him or her.  
22 Q. Which would include the FDO umpire?  
23 A. Yes.  
24 Q. I think we can all understand that there must be an  
25 enormous amount of work that goes into the preparation

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1 of a live play exercise. But how lifelike are they? No  
2 doubt they differ in their lifelike qualities. But how  
3 lifelike are these exercises?  
4 A. It's difficult to explain, I think, unless you have been  
5 part of one. But albeit I think at the very beginning  
6 you do understand that this is an exercise, quite  
7 quickly, because it's live play, and because you can  
8 hear the radios and the things, whatever incident the  
9 test is surrounding you can hear playing out, it does  
10 feel very quickly like the real thing, it really is  
11 quite an immersive experience.  
12 Q. Here, the primary purpose of Winchester Accord was that  
13 it was a military relicensing training exercise.  
14 A. Yes.  
15 Q. In such circumstances, is there a risk that the emphasis  
16 is going to be on the military?  
17 A. Yes, I suppose as the primary purpose of the exercise.  
18 Q. If there's an emphasis on the military, there's likely  
19 to be an emphasis on the firearms response as well  
20 because they will be combined in one way or another?  
21 A. Yes, in that very early period, yes, that's right.  
22 Q. Mr Greaney, when asking you questions, referred to the  
23 many things that have been said about Winchester Accord  
24 and he referred to an email that had been sent by  
25 Mr Fletcher to Mr Giladi.

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1 A. Yes.  
2 Q. It's not on your evidence proposal, but as there has  
3 been a reference to it, I'm going to invite you, please,  
4 to look at it. If you want time, you'll say so.  
5 A. Okay.  
6 Q. The email is at {INQ004520/1} and this is an email -- if  
7 we can start with the top half of that page, please.  
8 We can see it's an email from Mr Fletcher to  
9 Mr Giladi, dated 13 May. So days after the exercise;  
10 yes?  
11 A. Yes.  
12 Q. I wish I could summarise it, but I think it's actually  
13 going to be better and fairer to you to read it.  
14 A. Okay.  
15 Q. "Hi Leor, hope you are well. Following the exercise on  
16 Monday and not wishing to circumvent the debrief  
17 process, I was wondering if you would be up for  
18 a meeting with myself and Joe to cover an issue with the  
19 command and control situation. As said, not wishing to  
20 bypass the debrief process, but an issue for us from  
21 Monday was the linkage in particular in the initial  
22 stages of the incident, with the tactical firearms  
23 commander and the GMFRS/NWAS commanders.  
24 "Quite understandably, the police firearms tac  
25 commander located in the control room of the TC [that's

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1 Trafford Centre] with access to CCTV. However, there  
 2 was only a marshalling officer deployed to the initial  
 3 RVP to liaise with GMFRS/NWAS commanders. This officer  
 4 had no knowledge of our capabilities and linkage with  
 5 the tac commander was very limited. This led to an  
 6 excessive delay in FRS and NWAS resources moving forward  
 7 and it was approximately 2.5 hours before personnel were  
 8 committed to carry out triage and rescues. If this was  
 9 a firearms op commander, this might have been a little  
 10 slicker .

11 "As with everything, it all works much better when  
 12 individuals know each other and the exercise last year  
 13 at the Arndale ran differently due to the commanders  
 14 knowing each other quite well."

15 And he names them.

16 A. Mm—hm.

17 Q. He then goes on to say that it's perhaps a good idea to  
 18 have a day's awareness course for commanders and we now  
 19 start to move away from Winchester Accord itself, so  
 20 I hope I can fairly and succinctly stop there.

21 So there is Mr Fletcher setting out to Mr Giladi the  
 22 problem that was encountered. He identifies that as  
 23 being the linkage between the TFC — that must be the  
 24 ground—assigned TFC?

25 A. Yes.

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1 Q. Because he's at the scene?

2 A. Yes.

3 Q. The TFC, the ground TFC is in the control room at the  
 4 Trafford Centre watching CCTV, and fire and ambulance  
 5 appear to have been forgotten by him, the  
 6 ground—assigned; yes?

7 A. Yes.

8 Q. Then another problem identified at the RVP. It's  
 9 a matter of record, obviously, we've all seen the email,  
 10 we've read it, but there's nothing there about the FDO  
 11 being overwhelmed —

12 A. No.

13 Q. — or that being a danger.

14 A. No.

15 Q. I want to come, please, next —

16 SIR JOHN SAUNDERS: Do you mind?

17 I understand nothing about the FDO there, which was  
 18 one of the problems which has been identified to you.

19 The problem which is being identified there is — it  
 20 says a 2.5—hour delay in being called forward. So this  
 21 we have to anticipate, the fire officers have been  
 22 through the scene, they've cleared it?

23 A. The firearms officers, yes.

24 SIR JOHN SAUNDERS: They've cleared it, so we're all ready  
 25 to get people in to rescue the people who are there, and

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1 it takes actually 2.5 hours before that happens.

2 That is a pretty serious and fundamental problem, isn't  
 3 it?

4 A. I think that is a problem.

5 SIR JOHN SAUNDERS: Well, people could die in real life,  
 6 couldn't they?

7 A. Yes. I don't know whether it was the case that firearms  
 8 officers had been through and it was cleared. I seem to  
 9 remember on the night that there were a number — this  
 10 is from the notes of that initial call — a number of  
 11 offenders, not just one, and that they were in different  
 12 locations and that the firearms officers, along with the  
 13 military, were obviously deployed to find and neutralise  
 14 that threat. So I'm not sure how long that all took.

15 I'm not sure the gap would have been that long, if you  
 16 like.

17 SIR JOHN SAUNDERS: Well, we've had 1.5 and someone said  
 18 between 1.5 and 2.5, but it's a pretty long delay  
 19 whatever —

20 A. Yes.

21 SIR JOHN SAUNDERS: — and everyone's identified this as  
 22 being a problem and, you would agree, a pretty serious  
 23 problem?

24 A. Yes, it's a problem if the —

25 SIR JOHN SAUNDERS: Well, it is a serious problem because

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1 it's putting people's lives at risk, so would you agree  
 2 with "serious"?

3 A. Yes.

4 SIR JOHN SAUNDERS: And it wasn't raised at a debrief at  
 5 which you were present?

6 A. No, I think I — I haven't seen this email before today.

7 SIR JOHN SAUNDERS: I'm not blaming you for this but how can  
 8 it come about?

9 A. And I wonder whether, and this is just wondering from  
 10 reading that, whether Mr Fletcher feels — I know he  
 11 says "not to circumvent the debrief process", but he  
 12 feels like he's raised that with somebody that he knows  
 13 and trusts within GMP and that they are meeting and  
 14 there is a plan in place to resolve it and he didn't  
 15 feel the need then to mention it at the debrief.

16 SIR JOHN SAUNDERS: No, debriefs are rather more formal than  
 17 that, aren't they? Should you not have in a debrief all  
 18 problems identified so everyone can see the minutes of  
 19 them, everyone can understand the problems, everyone can  
 20 take control of whether they're dealt with or not?

21 A. Yes.

22 SIR JOHN SAUNDERS: Okay.

23 MR HORWELL: It plainly follows from what you have said that  
 24 whether waiting that long was justified or not depends  
 25 on when the scene was cleared.

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1 A. Yes.  
 2 Q. Because if the military and firearms officers are  
 3 seeking, presumably, armed terrorists, fire and  
 4 ambulance aren't going to be permitted to enter the  
 5 scene until that threat has been neutralised?  
 6 A. Yes.  
 7 SIR JOHN SAUNDERS: Can we just stop for a moment? I well  
 8 understand what you're saying and I do understand how it  
 9 can take longer to clear the scene. It's just that  
 10 throughout the evidence I haven't understood that to be  
 11 an issue, that the police are saying: actually, there  
 12 was no delay, as soon as we knew it was cleared, then  
 13 the police and ambulance were called forward. I haven't  
 14 understood that to be an issue or the case.  
 15 MR HORWELL: I do not know the answer, sir, to that. But  
 16 I was seeking evidence from the Gold commander as to  
 17 whether or not she can help us and plainly she can't.  
 18 SIR JOHN SAUNDERS: Well, she can't because she knows  
 19 nothing about any problem existing. Thank you. We will  
 20 delve more into it then perhaps.  
 21 MR HORWELL: The HMIC inspection in November of 2016.  
 22 You were taken to an email from Andrew Connell to  
 23 you and Debbie Ford, and it's a long email. I want to  
 24 take you to another part of it, please. It's  
 25 {INQ041071/1}. If we start with the first page of it,

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1 please. It's the bottom half this time.  
 2 I say long, it's three pages, but this is the email  
 3 from HMIC Liaison. We can tell that that is  
 4 Andrew Connell from the last page of the email. Can you  
 5 help us, HMIC Liaison and Andrew Connell?  
 6 A. Yes, that was Andrew's role in force at the time.  
 7 Q. So GMP's liaison with HMIC?  
 8 A. Yes.  
 9 Q. And it is sent on 14 October, so 2 weeks or so before  
 10 the start of the inspection. And you have been asked  
 11 about the sections, background and inspection on  
 12 {INQ041071/2}. I would ask that we go to {INQ041071/3}.  
 13 It's the paragraph beginning "if requested", if that  
 14 could be enlarged.  
 15 This is Mr Connell saying:  
 16 "If requested, a hot debrief can be conducted at the  
 17 end of the inspection. However, this will refer only to  
 18 the conduct of the inspection, will not include findings  
 19 which will only come at the end of the phase when all  
 20 the evidence has been collected and compared and  
 21 conclusions/recommendations can be made. If a hot  
 22 debrief is required, then we will need to identify who  
 23 will attend."  
 24 That first paragraph, the main paragraph that I have  
 25 taken you to, was that your understanding before this

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1 inspection?  
 2 A. I think -- it was the first hot debrief I had attended  
 3 as an ACC, obviously having only been in post a very  
 4 short time. My understanding was there are two fairly  
 5 distinct processes. With a thematic inspection --  
 6 Q. Which is what this was?  
 7 A. Which is what this was. A number of forces are done in  
 8 quite quick succession and at the end there are  
 9 recommendations, whereas if it was an individual PEEL  
 10 inspection, which was running alongside this, obviously  
 11 the findings refer only to the force that the PEEL  
 12 inspection is done in and that hot debrief is clearly  
 13 more relevant to that particular force.  
 14 Q. Because this is looking at national issues and national  
 15 recommendations?  
 16 A. Yes.  
 17 Q. By the time of this inspection of course you were  
 18 temporary ACC for specialist operations and a number of  
 19 questions have been asked as to whether or not you were  
 20 qualified for that role; yes?  
 21 A. Yes.  
 22 Q. You had been an FDO, albeit some years before,  
 23 2002/2003? You had been a police officer since 1995?  
 24 A. Yes.  
 25 Q. And depending on the point that is being made,

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1 experience or familiarity can be advantageous, it can be  
 2 disadvantageous.  
 3 A. Yes.  
 4 Q. The advantages being a fresh pair of eyes, a new broom  
 5 approach, and the disadvantages potentially being lack  
 6 of experience.  
 7 You have spent your working life in the police  
 8 service. Were you qualified for that role or not?  
 9 A. For the role of temporary ACC?  
 10 Q. In specialist operations.  
 11 A. Yes, I think... I think, as I reflected this morning,  
 12 it is -- an ACC's role is, by its very nature, very  
 13 wide-ranging and you don't have to have a huge amount of  
 14 detailed understanding of the portfolios beneath you  
 15 because there are people that have that. What you do  
 16 need to have is those strategic command qualifications  
 17 such as MAGIC, SFC and so on, and an ability to govern  
 18 and delegate and hold people to account, which is very  
 19 similar in many respects, whichever ACC portfolio you  
 20 hold, except the fact that there are different  
 21 specialisms within each.  
 22 Q. You sought a review of SOP 47 v4?  
 23 A. Yes.  
 24 Q. And that led to SOP 47 v5?  
 25 A. Yes.

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1 Q. And you've been asked about that, I just want to ask you  
2 about two paragraphs on one page. SOP 47 v5 is at  
3 {INQ039970/6}.

4 Towards the top of the page there's a reference:  
5 "There is little doubt that the FDO will face..."  
6 If we could enlarge that, please.  
7 "There is little doubt that the FDO will face  
8 significant challenges as the initial tactical commander  
9 for such an incident. Transfer of command to a cadre  
10 tactical firearms commander will also bring its own  
11 challenges. Consideration must therefore be given to  
12 whether it is in the interests of all involved to take  
13 over command from the FDO at a given point in time."

14 So that's recognising the significant challenges  
15 that the FDO would have at the outset of an MTFA?

16 A. Yes.

17 Q. Then towards the bottom of the page, there's a section  
18 with a heading "Force duty officer actions":  
19 "The actions of the force duty officer in the  
20 initial stages of a marauding terrorist attack are  
21 crucial. The following actions are not exhaustive, and  
22 the FDO will need strong support from the OCB team.  
23 Some of the actions are likely to be delegated to OCB  
24 supervision. FDO actions include: declaration of  
25 Operation Plato. Personnel from any service may report

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1 a suspected marauding terrorist firearms attack, however  
2 it is the FDO's responsibility to formally declare such  
3 an attack and initiate the multi-agency response."

4 Out of all of the actions, that is the one that is  
5 first in that list. Plainly, a vital action for the FDO  
6 to perform and plainly, once firearms officers are  
7 at the scene and reporting back, one would expect one of  
8 the first duties to be performed; yes?

9 A. Yes.

10 Q. Was it ever in your contemplation that an FDO would not  
11 notify the emergency service partners that Plato had  
12 been declared?

13 A. No, I think that's clear in the plan.

14 Q. Was it ever in your contemplation that an FDO would not  
15 initiate the multi-agency response?

16 A. No.

17 Q. They're basic, they're fundamental to his role as FDO?

18 A. Yes.

19 Q. The hot debrief on 3 November 2016. Leading up to this  
20 meeting on that day, we know that Mr Buchan, amongst  
21 others, interviewed Mr Sexton. We can see from  
22 Mr Buchan's transcript of his evidence -- I'm not going  
23 to go to it, but for those that wish to follow, it  
24 starts from pages 109 to 112 {Day61/109:1}. I'm going  
25 to summarise for the sake of brevity.

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1 Mr Buchan gave evidence to the effect that Mr Sexton  
2 was very clear he understood the processes and  
3 procedures and policies. He referred to Mr Sexton's  
4 aide-memoire. He said that Mr Sexton was aware that  
5 setting up a dedicated Airwave radio channel with the  
6 ambulance and Fire and Rescue Services -- as to volume  
7 of calls, Mr Sexton said that he thought the force would  
8 become overwhelmed with the sheer volume of people  
9 ringing in but nothing there about the FDO himself being  
10 overwhelmed.

11 So he had interviewed Mr Sexton and then met you on  
12 3 November, as it appears from an email to which I will  
13 come in a moment, for half an hour only.

14 A. Yes.

15 Q. We know that Mr Buchan took no notes, either at the time  
16 or after the meeting. He never sent you anything in  
17 writing afterwards.

18 A. No.

19 Q. We know that he got the date wrong for the meeting and  
20 he got your position within GMP wrong as well. You  
21 did --

22 SIR JOHN SAUNDERS: I think you need to say yes, otherwise  
23 it looks like one long question.

24 A. Yes. I apologise.

25 SIR JOHN SAUNDERS: Sorry, she does actually need to say

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1 yes, otherwise it won't go on the transcript.

2 MR HORWELL: Thank you.

3 We know you did take notes of the meeting and that  
4 you sent an email several hours afterwards.

5 A. I did.

6 Q. Let us come to the note. It's within your daybook and  
7 that's {INQ041074/16}. You expand on this in the email  
8 that you sent several hours later?

9 A. Yes.

10 Q. "FDO very good."

11 A. Yes.

12 Q. And we can bear in mind what Mr Buchan was told by  
13 Mr Sexton in his interview. Written as if this is  
14 a question:

15 "Is there enough resilience around the FDO?"

16 A. Yes.

17 Q. And:

18 "OCB staff unsure about what their exact role is.

19 Is there any guidance in OCB about specific MTFA?"

20 Is there anything in that note that suggests that  
21 Mr Buchan indicated that there was a significant problem  
22 with the FDO?

23 A. No, there isn't from my reading of it there. And  
24 I think, as I've said before and as I mention in my  
25 statement, it is my working practice, has been for many,

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1 many years, and still is to this day, to put an A with  
 2 a circle if I do --  
 3 Q. I'm going to come to that in a minute.  
 4 A. No, there's nothing --  
 5 Q. Is there anything on that page which indicates that?  
 6 A. There isn't to me, no.  
 7 Q. And this follows from what you were going to say. I'm  
 8 sorry to stop you but I'm going to come to your witness  
 9 statement. That's the reason I stopped you and we'll  
 10 look at it in detail there.  
 11 A. Okay.  
 12 Q. But anything on that page, and we'll come back to this,  
 13 I promise you, that indicates that urgent action or  
 14 urgent attention was required?  
 15 A. No.  
 16 Q. If we look now at the email, which is at {INQ041272/1},  
 17 at the bottom, please.  
 18 This is from you to chief officers. The importance  
 19 is the fact that it was sent by you on the day of this  
 20 meeting, 3 November --  
 21 A. Yes.  
 22 Q. -- at 7.36.  
 23 A. Yes.  
 24 Q. And if we go to the second page, {INQ041272/2}, and the  
 25 top of it, please:

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1 "Had a half-hour hot debrief with Andy Buchan from  
 2 HMIC today."  
 3 That's where the half hour comes from?  
 4 A. Yes.  
 5 Q. "Aside from the pilot in Devon and Cornwall, we are the  
 6 first group of forces to be inspected in this thematic.  
 7 They are inspecting 18 forces in total and will then  
 8 comment on the overall ability of the police service to  
 9 command and control an MTFA."  
 10 So this is the national aspect of this inspection?  
 11 A. Yes, it is.  
 12 Q. You've obviously got to look at constabularies and 18  
 13 were chosen, but this is looking at it on a national  
 14 basis?  
 15 A. Yes.  
 16 Q. "In summary, really impressed with the knowledge,  
 17 capability and enthusiasm of all groups of staff spoken  
 18 to, especially the FDOs, SFCs, TFCs and OFCs. Everyone  
 19 had given them a consistent message about what would  
 20 happen in the first 4 hours of a potential MTFA and the  
 21 commanders had left them feeling very confident that  
 22 there is a plan and that it would be followed."  
 23 A. Yes.  
 24 Q. Is that your doing your best to summarise this meeting?  
 25 A. It is.

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1 Q. "Areas for development were [and we can see this in your  
 2 hot debrief note]: is there enough resilience around the  
 3 FDOs in the event we have an MTFA--style incident? This  
 4 wasn't really about numbers of people, but about people  
 5 having specific roles in specific seats."  
 6 A. Yes.  
 7 Q. Again, is that your doing your best to summarise what  
 8 Mr Buchan was saying to you or not?  
 9 A. Yes, I believe so.  
 10 Q. "Our FDOs were able to evidence that they had picked  
 11 this up from exercising during summer and they were on  
 12 (sic) with producing guidance and crib cards for  
 13 colleagues."  
 14 We know that there was an aide--memoire in existence  
 15 at the time because Mr Buchan refers to it in one of the  
 16 interviews of Mr Sexton.  
 17 A. Yes.  
 18 Q. And then a little further down the page:  
 19 "All three of these issues are national rather than  
 20 GMP specific. I agreed that we would carry on looking  
 21 at the OCB staff crib sheets and would feed into it any  
 22 national work at a later stage."  
 23 SIR JOHN SAUNDERS: Okay, just help me about that.  
 24 A national issue rather than GMP specific. So Devon and  
 25 Cornwall had been looked at on a pilot?

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1 A. Yes.  
 2 SIR JOHN SAUNDERS: By the time of this hot debrief, had any  
 3 other forces been looked at?  
 4 A. I think they did it in groups. So I think there were  
 5 a number of forces being done by different inspectors at  
 6 the same time as us.  
 7 SIR JOHN SAUNDERS: So you were being told on these other  
 8 forces they were finding the same issues?  
 9 A. Yes, I think that's what Andy Buchan must have said to  
 10 me and also probably referring back -- I know that prior  
 11 to coming and doing the actual visit, HMIC will do a  
 12 desktop review as well. So they may also have evidence  
 13 from those 18 forces based on that and then they come  
 14 and do the actual reality testing part.  
 15 SIR JOHN SAUNDERS: Thank you. Your evidence overall is  
 16 what you got from Andy Buchan was no impression that  
 17 anything was urgent for you to do?  
 18 A. No, that's right.  
 19 SIR JOHN SAUNDERS: Are you leaving this or are you carrying  
 20 on with the same topic?  
 21 MR HORWELL: I was going to ask one question arising from  
 22 what you said.  
 23 SIR JOHN SAUNDERS: I just want perhaps, if we look at this,  
 24 to show it really depends how you ask the questions  
 25 a bit. So the threat level is severe of an MTFA?

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1 A. Yes.  
 2 SIR JOHN SAUNDERS: It could happen at any time and  
 3 Manchester might well be an attractive target for that  
 4 to happen?  
 5 A. Yes.  
 6 SIR JOHN SAUNDERS: So you are facing an immediate threat of  
 7 an MTFA?  
 8 A. Yes.  
 9 SIR JOHN SAUNDERS: And you're being told:  
 10 "Query, is there enough resilience around the FDOs?"  
 11 So there is concern about that.  
 12 A. Yes.  
 13 SIR JOHN SAUNDERS: Lack of resilience means they may not be  
 14 able to cope with it if it happens.  
 15 A. Yes.  
 16 SIR JOHN SAUNDERS: There's also concern that the people  
 17 actually in the OCB don't actually know what their roles  
 18 are. That's what was told to you -- the notes you made  
 19 of the hot debrief.  
 20 A. Specific to the MTFA.  
 21 SIR JOHN SAUNDERS: Okay.  
 22 A. Yes.  
 23 SIR JOHN SAUNDERS: So there are problems if -- could be  
 24 problems if an MTFA happened and it could happen at any  
 25 time?

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1 A. Yes.  
 2 SIR JOHN SAUNDERS: Is that not an urgent situation?  
 3 A. It is -- yes, it is an urgent situation.  
 4 SIR JOHN SAUNDERS: So it's the way you ask the questions  
 5 which really matters?  
 6 A. Yes, I think what I would follow up, though, with  
 7 that is that the action cards --  
 8 SIR JOHN SAUNDERS: You said things were being done to deal  
 9 with it.  
 10 A. And they were being done and I think the point that,  
 11 based on this email, Mr Buchan was making to me was  
 12 actually it's better to have this done once consistently  
 13 for all forces than have the situation where we've got  
 14 43 different iterations. It would have taken GMP time  
 15 to develop a training programme around this when there  
 16 was in essence a plan for a national one to be  
 17 developed.  
 18 SIR JOHN SAUNDERS: He was saying: hold your horses, wait  
 19 until we have finished? Is that what you're saying?  
 20 A. I think he was saying to me -- and again I've got to be  
 21 really clear here that I don't remember this  
 22 conversation -- the only thing I can reflect upon is  
 23 this email that was sent on the day.  
 24 SIR JOHN SAUNDERS: Okay.  
 25 A. I think what I take from this is to say: these are three

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1 areas, they're not GMP specific, I am going to raise  
 2 this with the national Prevent and Prepare lead and  
 3 we're going to work up a national solution rather than  
 4 43 different attempts. And I think that's my  
 5 recollection on the same day.  
 6 SIR JOHN SAUNDERS: Did that come back, recommendations  
 7 following the whole thing to you?  
 8 A. Not to me specifically, but I know that those -- there  
 9 is reference in the letters in March and April to  
 10 feedback from the ongoing CT2 inspections that have  
 11 generated the -- I don't know if it's College of  
 12 Policing or CT Policing national training product for  
 13 control room staff.  
 14 SIR JOHN SAUNDERS: Had that happened before we had the  
 15 attack in May?  
 16 A. I'm unsure on the details, but I think -- I'm sure I've  
 17 seen an email somewhere where those products landed on  
 18 the last day of May.  
 19 SIR JOHN SAUNDERS: Thank you.  
 20 MR HORWELL: In terms of what other forces may or may not  
 21 have said, I think it's clear from that email, and this  
 22 has been the evidence from elsewhere, but I'm not  
 23 certain, that after the pilot with Devon and Cornwall,  
 24 GMP was the first force to be visited.  
 25 A. Yes, but I think -- I'm not sure about this -- that

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1 there was a group. So I think we were one of that first  
 2 group, was my understanding, but I might be wrong on  
 3 that.  
 4 Q. You have been asked by the chairman about urgency.  
 5 If we look at the NPCC March 2017 Plato guidance, and  
 6 that is at {INQ016688/10}, please.  
 7 It's 5.18 and this national document, so we're  
 8 March 2017, 4 months or so on from the inspection of  
 9 Greater Manchester Police. 5.18:  
 10 "Plans should consider the use of action cards or  
 11 action drop-down lists within control rooms that are in  
 12 keeping with the guidance within this document."  
 13 A. Yes.  
 14 Q. So by March, what is being said by the national body  
 15 is that plans should consider the use, not must use?  
 16 A. Yes, that's what it says there, yes.  
 17 Q. And if we follow the chronology through, CT2 was  
 18 published in August of 2017, in which it was recommended  
 19 that there should be plans for training by September of  
 20 2017?  
 21 A. Okay.  
 22 Q. So 10 months after the inspection of Greater Manchester?  
 23 A. Yes.  
 24 SIR JOHN SAUNDERS: Thanks for those dates.  
 25 MR HORWELL: I stopped you because you wanted to tell the

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1 chairman about the As that you write.  
 2 A. Yes.  
 3 Q. To do this in, I hope, as short and as comprehensive  
 4 a fashion as possible — because this is a very  
 5 important part of your witness statement that we haven't  
 6 heard about yet — I'm going to take you to the witness  
 7 statement. It's going to take a few minutes to go  
 8 through it, I'm afraid, but it is important that the  
 9 chairman understands what it is that you have to say.

10 The witness statement is {INQ041068/1}. And if we  
 11 could go to {INQ041068/8}, please, and paragraph 38:

12 "While I cannot recall the meeting [this is the hot  
 13 debrief on 3 November] I do not believe that I was given  
 14 the impression by Mr Buchan that he had any concerns  
 15 which necessitated immediate action on the part of GMP.  
 16 I say this for a number of reasons..."

17 And the number of reasons is in fact five.

18 A. Yes.

19 Q. This is the one that I stopped you from revealing:

20 "First, when I have tasks to action following  
 21 a meeting, I write an A for action in a circle next to  
 22 the task and then tick it once it is complete. This can  
 23 be seen in the entries from my daybook."

24 Let's, with that in mind, go to the daybook. Can we  
 25 start at {INQ041074/2}. Unless anyone were to suggest

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1 otherwise, especially you, I don't think the context  
 2 matters. It's the principle here.

3 A. Yes.

4 Q. So on page 2, a meeting you had on 19 October.

5 A. I don't think I've got the right thing in front of me.

6 Q. Have I given — {INQ041074/2}. This happens to be  
 7 a meeting you had on 19 October.

8 Some issues arose that you obviously thought had to  
 9 be actioned.

10 A. Yes.

11 Q. So you've written an A in a circle. That's the first  
 12 step; yes?

13 A. Yes.

14 Q. And when that action is completed, you go back to the  
 15 document and tick it?

16 A. Yes.

17 Q. And that was the system that you used in 2016?

18 A. Yes, I've used it for years and still do now.

19 Q. Right. Page 6 — page 5, I'm sorry, {INQ041074/5}.

20 This is perhaps the best example we will see. Seven As  
 21 have been circled and each bar one has been ticked.

22 A. Yes.

23 Q. Next page, {INQ041074/6}. We see one example of that,  
 24 an A that has been ticked.

25 A. Yes.

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1 Q. And {INQ041074/9} at the bottom. Another example, an A  
 2 that has been ticked.

3 A. Yes.

4 Q. If we go now again to {INQ041074/16}, which is the hot  
 5 debrief note that you took at the time of the meeting,  
 6 no As and obviously if no As, no ticks?

7 A. That's right.

8 Q. If you had been told by Mr Buchan that there was  
 9 something that required attention or action, what would  
 10 you have done?

11 A. I did an A in a circle at the end of that line and came  
 12 back to it to tick it when I'd completed that action.

13 SIR JOHN SAUNDERS: You would make your own decisions as  
 14 well presumably, wouldn't you? If when Mr Buchan told  
 15 you he didn't say, "I think action this immediately",  
 16 but you thought you should, you'd do exactly the same  
 17 thing?

18 A. Yes, absolutely.

19 SIR JOHN SAUNDERS: It's your decision.

20 A. Yes. Many of the things that we have got an A against  
 21 there will not be things that people are actioning to  
 22 me —

23 SIR JOHN SAUNDERS: No, you have decided —

24 A. — they will be things I have recognised myself that  
 25 need something doing and that's my reminder.

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1 SIR JOHN SAUNDERS: Quite.

2 MR HORWELL: Go back to your witness statement, please,  
 3 {INQ041068/1}, paragraph 40.

4 This is the second of five reasons that you gave:

5 "Second, as set out above, I had prepared very  
 6 carefully for the inspection. If I had been told by  
 7 Mr Buchan that immediate changes needed to be made to  
 8 GMP's policies, procedures or practice, at the hot  
 9 debrief, I believe I would have ensured these were  
 10 followed up in a similarly meticulous fashion."

11 A. I believe I would, yes.

12 Q. Anything that has happened since writing this witness  
 13 statement to cause you to modify that view?

14 A. I don't think so, no.

15 Q. Third, paragraph 41:

16 "I chaired a meeting of the firearms policy group on  
 17 3 November 2016 at 2 pm. This was an hour after the hot  
 18 debrief was scheduled to finish."

19 And you show the diary entry, we need not look at  
 20 it, and you exhibit the minutes. Again, we need not  
 21 look at those:

22 "The minutes state that the FPG meeting began at  
 23 10 am but I believe this is an error, probably caused by  
 24 somebody cutting and pasting from a template, as my  
 25 diary shows it was rescheduled to take place at 2 pm.

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1 The FPG meeting was probably rescheduled as a result of  
 2 the hot debrief at 12 pm."  
 3 A. Yes.  
 4 Q. "Moreover, my notes from the FPG in my daybook state  
 5 that it took place at 2 pm, thus confirming it took  
 6 place after the hot debrief and the time in the minutes  
 7 is incorrect. The minutes show that I do not share any  
 8 HMIC concerns with the FPG, which I believe I would have  
 9 done if Mr Buchan had suggested that we needed to  
 10 address any particular concerns immediately. Indeed,  
 11 the only reference I make to HMIC is under section 7  
 12 in relation to testing: ACC CH stated [that's you  
 13 of course] that HMIC were complimentary in the  
 14 exercising and testing we had done. There is one other  
 15 reference to HMIC..."  
 16 And one that isn't relevant.  
 17 A. Yes.  
 18 Q. Paragraph 42:  
 19 "Fourth, on 7 November 2016, I took part in the  
 20 regular informal Monday morning meeting of the chief  
 21 officers. My notes of issues to raise at the meeting  
 22 are in my daybook... There is no reference to the hot  
 23 debrief or the HMIC inspection. If I thought urgent  
 24 action needed to be taken following the CT2 inspection,  
 25 I would have raised it at the meeting."

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1 A. Yes.  
 2 Q. And then:  
 3 "Fifth, it is clear from the email sent to me on  
 4 14 October..."  
 5 That's the one we've already looked at?  
 6 A. Yes.  
 7 Q. "... that the intention was that the hot debrief should  
 8 deal with the conduct of the inspection and not the  
 9 findings of it, which would only come once all the  
 10 evidence had been collected and compared and conclusions  
 11 and recommendations made. The email also suggests that  
 12 the hot debrief is optional and will only take place if  
 13 requested. I am not surprised by this. My  
 14 understanding was always that once the HMIC inspectors  
 15 had conducted their visit, they would need to collate  
 16 their findings, subject them to a national moderation  
 17 process, and publish a report. After all, the visit had  
 18 only concluded on the date of the hot debrief and  
 19 Mr Buchan was only one of the team of inspectors.  
 20 I note that, when giving evidence, Mr Buchan said he  
 21 would not have provided me with any documents or had  
 22 access to the HMIC evidence—gathering templates when we  
 23 met."  
 24 A. Yes.  
 25 Q. And finally this, paragraph 44:

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1 "While I cannot now recall what was discussed during  
 2 the hot debrief, for the reasons set out above I do not  
 3 believe that Mr Buchan gave me the impression that GMP  
 4 needed to take any immediate action following the  
 5 inspection. I infer from all of the circumstances that  
 6 I was under the impression that GMP should await the  
 7 national CT2 report and the accompanying  
 8 recommendations. I understand this report was only  
 9 available in August 2017, by which point I had left  
 10 GMP."  
 11 A. Yes.  
 12 Q. Anything to cause you to modify any of the points that  
 13 you sought to make there in your statement?  
 14 A. No, and as I mentioned when the chairman just asked me  
 15 the question there, even given that, and that  
 16 expectation around waiting, if I'd felt that something  
 17 would have been discussed in terms of urgency, I am  
 18 confident that, as I've written there, I would have put  
 19 an A and done something about it.  
 20 SIR JOHN SAUNDERS: Let's just talk about fifthly a bit, can  
 21 we, which is paragraph 43?  
 22 A. Yes.  
 23 SIR JOHN SAUNDERS: I'm well aware that the email that you  
 24 got from your coordinator indicated that you could have  
 25 a hot debrief if you wanted to but actually they

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1 wouldn't talk about their findings, they would just talk  
 2 about how the inspection had been conducted generally.  
 3 A. Yes.  
 4 SIR JOHN SAUNDERS: But it is perfectly clear that they did  
 5 deal with some of their findings, didn't they?  
 6 A. Yes.  
 7 SIR JOHN SAUNDERS: So that's slightly irrelevant?  
 8 A. Slightly?  
 9 SIR JOHN SAUNDERS: Irrelevant.  
 10 A. I think probably the more relevant part of that, I think  
 11 my understanding of that debrief and debriefs since  
 12 is that absolutely, some of the findings are discussed.  
 13 I think it's — the more relevant bit is whether I felt  
 14 at the time that there was any action required  
 15 immediately or whether there was the pulling together of  
 16 all of those 18 different force reports into a national  
 17 moderation process for the report to come out with some  
 18 recommendations from a national perspective.  
 19 SIR JOHN SAUNDERS: With the benefit of hindsight, and  
 20 entirely with hindsight, depending on what I conclude  
 21 about the FDO and why he didn't tell other people he'd  
 22 declared Operation Plato, it might be said, well,  
 23 actually, those things were urgent, we now know with the  
 24 benefit of hindsight, and the issue really is should GMP  
 25 at that time have realised that they were urgent or were

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1 they entitled to do what you have just said, which is  
 2 wait for the report to come out?  
 3 A. And I think again, I would want to really press home the  
 4 point that I don't think there was a wait and a vacuum.  
 5 I think it was wait for things that might come out of  
 6 a national report but actually there were already things  
 7 going on to mitigate some of this risk.  
 8 SIR JOHN SAUNDERS: The difficulty about that, you're saying  
 9 you thought it was going on, actually it clearly wasn't  
 10 going on at a speed which could be described as anything  
 11 other than a snail.  
 12 A. It wasn't embedded, certainly.  
 13 SIR JOHN SAUNDERS: Okay, thank you.  
 14 MR HORWELL: Perhaps to summarise all of this in one  
 15 question, if Mr Buchan had said, "You've got this  
 16 problem, you must do something about it now", would  
 17 you have responded?  
 18 A. I would, straightaway.  
 19 MR HORWELL: That's all I ask, thank you.  
 20 MR GREANEY: I don't have any further questions.  
 21 Sir, do you have any additional questions?  
 22 SIR JOHN SAUNDERS: No.  
 23 I'm very grateful. We're obviously trying to ask  
 24 you testing questions, but that's the point of this  
 25 inquiry.

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1 A. Absolutely.  
 2 SIR JOHN SAUNDERS: And as I said, it sometimes depends how  
 3 the questions are phrased, what the answer is.  
 4 MR GREANEY: Sir, could we take a short break, perhaps  
 5 10 minutes, and then we'll at least make a start on  
 6 Mr Fletcher?  
 7 SIR JOHN SAUNDERS: Yes. Thank you very much.  
 8 (3.44 pm)  
 9 (A short break)  
 10 (4.00 pm)  
 11 MR JOHN FLETCHER (recalled)  
 12 Questions from MS CARTWRIGHT  
 13 MS CARTWRIGHT: Sir, as you're aware, Mr Fletcher's  
 14 previously have evidence to the inquiry on 10 February  
 15 of this year and on 22 February and he returns now  
 16 principally to deal with the events of 22 May of 2017.  
 17 Mr Fletcher, can I firstly acknowledge and identify  
 18 that since you gave evidence on the last occasion, you  
 19 very recently provided an additional witness statement  
 20 to the inquiry and so, first of all, could we identify  
 21 that document. I'm going to deal with this first before  
 22 we move on to the events of 22 May.  
 23 You have provided a witness statement dated 24 June  
 24 of this year. Do you have a copy of that in front of  
 25 you?

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1 A. Yes, I do.  
 2 Q. Are the contents of that witness statement true to the  
 3 best of your knowledge and belief?  
 4 A. They are.  
 5 Q. And would it be right to summarise that you provided  
 6 that witness statement because there had become some  
 7 issues about what was the relevant mobilisation policy  
 8 that was in place at the time of the arena attack?  
 9 A. That's correct, yes.  
 10 Q. And I think what you have indicated is whilst you had  
 11 started a draft of an additional mobilisation policy  
 12 that we'll look at in a moment that has a date recorded  
 13 in it from February of 2017, that was not an effective  
 14 policy?  
 15 A. It wasn't, no.  
 16 Q. It was not a policy that had been approved or ratified  
 17 in any way?  
 18 A. No.  
 19 Q. And so you have confirmed that the relevant and in force  
 20 mobilisation policy on the night of the attack was the  
 21 policy from 2015?  
 22 A. That's correct, ma'am, yes.  
 23 Q. So can we first of all just identify the document  
 24 you have confirmed in your witness statement was the  
 25 applicable document.

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1 Mr Lopez, please could we display {INQ004540/1}.  
 2 If we move, please, Mr Lopez, to page {INQ004540/3},  
 3 we can see there, it's recorded as version 1, dated  
 4 3 December 2015. If we move over the page, please, to  
 5 {INQ004540/5}, where the guidance there is set out and  
 6 we may briefly look at that. Just to confirm,  
 7 Mr Fletcher, this is the appropriate policy?  
 8 A. It is, yes.  
 9 Q. Thank you.  
 10 Then just to identify the document that created the  
 11 issue that required clarity, Mr Lopez, please could you  
 12 display {INQ004213/1}. The same front cover, but move  
 13 again, please, to {INQ004213/3}.  
 14 We see there the date of 27 February 2017.  
 15 A. Yes.  
 16 Q. Thank you.  
 17 Mr Fletcher, could I ask you to look, please, at  
 18 {INQ004213/5}. We see -- I'm not going to have both  
 19 displayed and do a compare and contrast, but we see  
 20 in the amended draft policy that you were working on  
 21 in February 2017 that there is additional language that  
 22 has been added to the draft you were working on. In  
 23 particular, by reference to the contacting of the duty  
 24 NILO, of the FDO, and we can see that it's additional  
 25 wording that's included in your draft:

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1 "The duty NILO will, if possible, liaise direct with  
2 the force duty officer to obtain further information and  
3 intelligence."

4 And it's correct, isn't it, Mr Fletcher, that that's  
5 not in the policy that was in force at the time?

6 A. Yes, correct.

7 Q. So can you indicate what your thought process was as to  
8 why that caveated language was being thought about in  
9 your February 2017 work?

10 A. Just for clarity, the February date was when I started  
11 looking at this. It was an ongoing review of the  
12 document. So obviously it takes into account the  
13 Exercise Hawk River, when it was discussed that the  
14 force duty officer would be busy during a terrorist  
15 incident. "If possible" means speaking directly to the  
16 force duty officer. It wasn't any indication that  
17 we wouldn't be able to get through, we knew we might  
18 have to speak to the supervisor who was with the force  
19 duty officer. The best communication would be directly  
20 with the force duty officer himself or herself, but it's  
21 acknowledged that we might not be able to speak to them  
22 direct at that incident.

23 Q. Thank you. You specifically referenced Exercise  
24 Hawk River there; is that correct?

25 A. That's correct, yes.

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1 Q. We also see within the draft you were working on in  
2 February, and I think you've confirmed, it's when you  
3 commenced the work?

4 A. It is.

5 Q. We see a little bit further down, at point 4H, you there  
6 reference a specific Airwave Talk Group. It is right,  
7 isn't it, that under the redaction that was the work  
8 that was being done in respect of the tactical  
9 interoperable Airwave that was being trialled or being  
10 looked at by Laura Lewis and Jo Hoyte; is that correct?

11 A. That's correct.

12 Q. Why specifically then had you included the reference to  
13 that Talk Group in the draft work you were doing at the  
14 time?

15 A. As I said, it was a sort of organic document that I was  
16 reviewing as we went along, so further lessons that were  
17 identified, and obviously the identification of that  
18 Talk Group, it was important to put in before I went  
19 through the final consultation process of the final  
20 document.

21 Q. Thank you. We also see at {INQ004213/7} within the  
22 draft that you were working on before the attack at  
23 point 9, something that's expressly stated and I can't  
24 see in the applicable guidance at the time, which was --  
25 it is made clear in the document you were working on:

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1 "Under no circumstances should non-MTFA trained  
2 personnel be mobilised to the incident."

3 A. Yes.

4 Q. So why did you feel it necessary to include that  
5 additional information in the draft?

6 A. I think that again was based on some feedback from the  
7 exercises and if it's confirmed that it's MTFA, we're  
8 going to need the specialist response. Non-specialists  
9 would come later on, after we'd sort of established  
10 a structure on the incident ground.

11 Q. Thank you. So we now know that this policy, even though  
12 it has a February date in version 1, was not in force,  
13 and so we really are to disregard that policy?

14 A. Yes.

15 Q. Can you assist though, but for the attack happening and  
16 the work you were doing on developing the mobilising  
17 policy, when had you envisaged that you would complete  
18 the revisions and train the relevant staff about the new  
19 envisaged procedure?

20 A. It would be in the -- probably in the weeks following  
21 the incident really. Like I say, it was quite a number  
22 of different things coming in. We updated the document  
23 and then what I would do then is send this out for  
24 a formal consultation -- what we have in the brigade was  
25 -- we called it the corporate document centre. I'd

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1 upload it on to there as a draft, those in the  
2 consultation phase would have a period of time to look  
3 at it, give feedback, and make any amendments and then  
4 eventually we'd put it on the "in place" documents on  
5 the centre.

6 Q. Thank you. So Mr Lopez, now can we go back then briefly  
7 into the relevant guidance, the February 2015  
8 document -- sorry, the December 2015 document,  
9 {INQ004540/5}.

10 So looking at "Actions on initial notification", and  
11 I appreciate that this is in the context of contact from  
12 members of the public, but 3(b) confirmed:

13 "Inform the duty NILO as a priority and obtain  
14 operational specific instructions from the duty NILO.  
15 The duty NILO will liaise direct with the FDO to obtain  
16 further information and intelligence."

17 A. That's correct, yes.

18 Q. So certainly that's what you envisaged at the relevant  
19 time would take place on the night of the attack?

20 A. It is, yes.

21 Q. Thank you. Mr Fletcher, your additional witness  
22 statement also deals with the revisions to the  
23 November 2017 mobilisation policy but I'm not going to  
24 deal with that at this stage but we can perhaps briefly  
25 look at that tomorrow when we deal with what changed

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1 after the attack.  
 2 A. Okay.  
 3 Q. Could we now briefly look at Exercise Hawk River which  
 4 is what you identify as the source of the reason for you  
 5 starting the work on revising the mobilisation policy.  
 6 Mr Lopez, please could we display {INQ004529/1}.

7 Again, I'm very briefly going to look at this  
 8 document because you did address Exercise Hawk River on  
 9 the last occasion. We see there the date of Hawk River  
 10 was 1 March 2017 and we can see that this report was  
 11 dated 7 April 2017.

12 If we please then move, Mr Lopez, to {INQ004529/4},  
 13 we can see that one of the identified aspects of good  
 14 practice from the exercise, which was a CT exercise to  
 15 trial or exercise an MTFA incident, was:  
 16 "Good practice was to implement a strategic,  
 17 tactical and operational command structure for an MTFA  
 18 incident."  
 19 Do you agree with that?

20 A. Yes.  
 21 Q. We'll perhaps come to look at that and who within  
 22 Greater Manchester Fire and Rescue Service were  
 23 discharging those roles on the night of the attack.  
 24 But could we also then look again to remind  
 25 ourselves at {INQ004529/6}, please. Exercise

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1 Hawk River, if we could expand over "communication",  
 2 please.  
 3 We can see that Exercise Hawk River clearly  
 4 identified :  
 5 "A consistent theme throughout the exercise was  
 6 Airwaves, particularly around the tri-service  
 7 communication protocols with conference calls and use of  
 8 Emergency Services 1 ([blank] Bronze/operational) and  
 9 [blank] (Silver /tactical level)."  
 10 And that is again what was being looked at to be  
 11 used as a control room interoperable channel; is that  
 12 correct?

13 A. It is, ma'am, yes.  
 14 Q. So again, I am not going to deal with all of those, but  
 15 plainly the need for there to be interoperable channels  
 16 to be used by, first of all, commanders, would you  
 17 agree, had been clearly identified by Hawk River?  
 18 A. Yes.  
 19 Q. But also for the ability for the control rooms to  
 20 operate on an interoperable Airwave channel?  
 21 A. Yes.  
 22 Q. Then finally, please, could I take you to two further  
 23 pages, {INQ004529/7}. We can see by way of good  
 24 practice again the -- what we've been described (sic) as  
 25 the tactical tri-service communication channel, which

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1 again was the one that had been looked at and trialled  
 2 by Laura Lewis and Jo Hoyte and checked at North West  
 3 Fire Control that it worked, was identified by way of  
 4 the tactical channel but also then the other  
 5 interoperable channel was identified to be used for the  
 6 Bronze activity.  
 7 A. Yes.  
 8 Q. We can see the recommendation for creating the SOP.  
 9 And finally for this document at {INQ004529/10}.

10 You told us on the last occasion about the specialist  
 11 resources, in particular the SRT vehicle and the TRU,  
 12 and the teams that essentially were deployed to use that  
 13 specialist equipment.  
 14 But we can see there's additional text now that has  
 15 been -- we're capable (sic) to see about some of the  
 16 resources that was identified and I just want to  
 17 identify and seek your assistance with what we see  
 18 there. I'm not going to deal with the role that SRT  
 19 teams can play about treatment and extrication of  
 20 casualties at the scene itself.

21 A. Mm-hm.  
 22 Q. We can see there that part of Hawk River highlighted --  
 23 it was highlighted that military, Fire and Rescue  
 24 Service and the local authority could assist with  
 25 transporting casualties if North West Ambulance Service

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1 were stretched. The responsibility for identifying the  
 2 appropriate hospital for the casualty sits with NWAS  
 3 with support from the clinical communications group.  
 4 So just on that point, is it right that the Fire and  
 5 Rescue Service could have had a role to play with the  
 6 transportation of casualties to hospital also?  
 7 A. It would be unlikely. But based on the needs of the  
 8 incident, I mean obviously fire engines aren't geared up  
 9 for transporting seriously injured people, but again  
 10 I suppose it would be a dynamic decision on the day. If  
 11 somebody needs to go to hospital, and there was a fire  
 12 engine available, maybe it would have been used, but  
 13 it's not the standard practice to use fire appliances  
 14 for transporting casualties, and again with the  
 15 specialist capability that we had, there was no real  
 16 casualty transportation facility on there.  
 17 Q. Thank you. Then if we look just at the row above we can  
 18 see reference to -- that it was raised that the Fire and  
 19 Rescue Service can provide tented structures to support  
 20 casualty clearing stations and the local authority can  
 21 provide vehicles for transportation.  
 22 So was the tented-type items that could have been  
 23 brought to scene to be used as a makeshift casualty  
 24 clearing station?  
 25 A. Yes, there was.

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1 Q. And again — thank you. That can now be removed please,  
2 Mr Lopez.  
3 I'm going to move now back into your original  
4 witness statement, please, and we're going to work  
5 through, please, your involvement in the events of  
6 22 May.  
7 I think it's right you identify in your witness  
8 statement that you weren't on duty on 22 May 2017.  
9 A. No, I'd just completed a weekend duty.  
10 Q. Can you then, please, just tell us how it was that you  
11 first became aware of the incident?  
12 A. I became aware of the incident via the WhatsApp message  
13 that was sent by ACO Keelan.  
14 Q. The inquiry have had sight of that WhatsApp message  
15 during the recent evidence of Mr Lawlor. Can you just  
16 confirm what time it would have been that you'd have  
17 seen the WhatsApp message?  
18 A. I think the WhatsApp message came in about 23.08  
19 I thought I was downstairs watching TV; my wife says  
20 I was actually in bed. The phone pinged. Because I was  
21 off duty it wasn't something I'd look at immediately,  
22 straightaway, so I think it was a couple of minutes  
23 later when I picked up the phone and actually saw the  
24 message.  
25 Q. I think you told us on the last occasion that you were

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1 a NILO?  
2 A. Yes.  
3 Q. You were the lead NILO; is that right?  
4 A. Well, the lead NILO was Mick Lawlor, but the NILOs come  
5 under my responsibility within the Contingency Planning  
6 Unit.  
7 Q. And you told us on the last occasion that you were the  
8 general manager for the Contingency Planning Unit?  
9 A. I was the group manager, yes.  
10 Q. Sorry, I do apologise. So when you saw that text  
11 message in the NILO WhatsApp group, what did you then  
12 do?  
13 A. I went downstairs and I phoned Andy Berry up. I think  
14 possibly in the message I think it said that he was  
15 (inaudible: distorted) he worked in my department anyway  
16 so I knew that Andy was the duty NILO. And I phoned him  
17 up for just an update as to what was going on.  
18 I expected that he would be mobile to the incident.  
19 Q. Can we briefly display that WhatsApp message,  
20 {INQ019040/1}.  
21 We can see the screenshot from the Sky News desk  
22 which made reference to the Manchester Arena, an  
23 incident and explosion. And then we see in response  
24 from Phil Nelson:  
25 "Minimum number of 18 fatalities. Dean is DGM and

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1 I think opening CSR. Andy Berry is NILO and stepping up  
2 MTFA capability."  
3 A. Yes, they're the only two messages that I saw at that  
4 time.  
5 Q. Thank you.  
6 So would it be fair to say that at that time then  
7 you knew that the incident was at the arena?  
8 A. Yes, I'd gone into the WhatsApp message and I think it  
9 said explosion at the arena and the police were asking  
10 people to stay away.  
11 Q. So in terms of who would be the command-type structure  
12 of who was on duty responding, would you have known at  
13 that time then who would have been the relevant  
14 individuals on duty to be deployed?  
15 A. No, the only one I probably knew, because of who worked  
16 in my department, was Andy Berry was the duty NILO.  
17 Q. I think you go on to tell us that you very shortly then  
18 after seeing that made contact with Mr Berry?  
19 A. That's correct.  
20 Q. And you should have in front of you there a schedule of  
21 various calls that have been extracted that then plots  
22 the various calls you made during the course of the  
23 evening. That's {INQ041569/1}. Perhaps, Mr Lopez, it  
24 could be displayed on the screen, please.  
25 If we could perhaps expand to start with the top of

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1 the schedule and we'll seek to make as much progress  
2 using this this afternoon, Mr Fletcher.  
3 We can see a call at 23.13 to Mr Berry that lasted  
4 2 minutes and 30 seconds. Can you please just assist us  
5 with what you discussed with Mr Berry during that call?  
6 A. Basically, I just asked him what was going on, what the  
7 situation was. He informed me that it was a bomb and an  
8 active shooter. I said, "I have not seen anything about  
9 a bomb or active shooter". He went, "No, it is a bomb  
10 and an active shooter", and then he went through the  
11 actions that he'd taken so far, that he'd mobilised the  
12 MTFA capability and two NILOs and four fire appliances  
13 to Philips Park.  
14 I asked why he was going to Philips Park, why didn't  
15 he stay at — or go to Thompson Street or  
16 Manchester Central Fire Station. He said, you know,  
17 "It's too close, the MTFA, I know the area", and he set  
18 up — "I've established initially Philips Park as the  
19 rendezvous point".  
20 Q. You tell us in your witness statement that you said  
21 during the conversation you would probably have  
22 initially stayed at Manchester Fire Station.  
23 A. Yes, that's correct, ma'am.  
24 Q. And do you recall clearly saying that to Mr Berry?  
25 A. I couldn't state 100% definitively, but I'm pretty

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1 certain that I did.  
 2 SIR JOHN SAUNDERS: Just repeat what you said to him,  
 3 because I'm afraid I missed it.  
 4 A. When he said he was going to Philips Park, I said, "Why  
 5 are you going to Philips Park, why didn't you go to  
 6 central?", and he basically said to me, "I know the  
 7 area I used to work there" --  
 8 SIR JOHN SAUNDERS: I've got that bit, sorry.  
 9 MS CARTWRIGHT: In terms of your role, the work that you did  
 10 in particular in the Contingency Planning Unit, it's  
 11 right, isn't it, that there is a zone area when it's  
 12 an MTFA to which you should have resources beyond?  
 13 A. Yes -- well, it's when it's declared as a Plato, a Plato  
 14 is a OS OS -- sorry, I do apologise. There  
 15 is a zone put in place.  
 16 Q. In terms of Manchester Central Fire Station, even if it  
 17 was known that this is a Plato at this time, and in  
 18 accordance with policy and procedure, that would have  
 19 been an area outside that designated zone in any event,  
 20 wouldn't it?  
 21 A. It would have been, ma'am. I think what was going  
 22 through his mind was this wasn't just --  
 23 SIR JOHN SAUNDERS: I don't think you need to worry about  
 24 what was going through his mind unless he told you.  
 25 A. Sorry, sir.

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1 SIR JOHN SAUNDERS: That's all right.  
 2 MS CARTWRIGHT: From your point of view did you seek to  
 3 challenge in any way that he had then identified  
 4 Philips Park as a rendezvous point?  
 5 A. At that time I didn't. The reason for that is, as I've  
 6 been told then that it was a bomb and an MTFA, this was  
 7 going down the route of a Plato response, it was  
 8 a specialist response that we would need to go in, and  
 9 waiting for the identification of the FCP, which we were  
 10 expecting to come fairly quickly, this was a means of  
 11 getting the specialist response coming in towards the  
 12 city rather than appliances moving away.  
 13 Q. In terms of what Mr Berry shared with you during that  
 14 call, you go on to tell us in your witness statement  
 15 that you had not been made aware that a rendezvous point  
 16 had been given by Greater Manchester Police to the  
 17 cathedral car park.  
 18 A. Yes, that's correct.  
 19 Q. But in terms of -- you now know that in fact that  
 20 information was given to Mr Berry himself, that that had  
 21 been the identified rendezvous point?  
 22 A. Yes.  
 23 Q. So would you have expected Mr Berry to tell you when  
 24 he was discussing the identified rendezvous point and  
 25 it's your evidence that you essentially said, "I would

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1 have stayed at Manchester Central", would you have  
 2 expected Mr Berry to share with you that in fact GMP had  
 3 identified the cathedral car park?  
 4 A. Quite possibly but I don't think he passed that on to  
 5 the other NILOs either.  
 6 Q. But again, if he had told you at that time that Greater  
 7 Manchester Police had identified the cathedral car park,  
 8 would you have been stronger in your support for staying  
 9 at Manchester Central?  
 10 A. Yes.  
 11 SIR JOHN SAUNDERS: But you wouldn't have been telling him  
 12 he should go to the cathedral car park?  
 13 A. I suppose in hindsight, I would have done. I would have  
 14 been waiting for the declaration of the FCP from the  
 15 police. I've got to say, I think if the police had  
 16 nominated an RVP, it's a difficult one, but to say  
 17 now -- at the time I would say go to the RVP. I think  
 18 it'd be disingenuous for me to confirm that, but I would  
 19 have definitely stayed at Manchester Central as  
 20 a minimum.  
 21 MS CARTWRIGHT: Again to be fair and accurate, we know that  
 22 conversation was 22.40 and we also know that additional  
 23 information by way of information about the potential  
 24 firearm attack and a shooter had developed during the  
 25 intervening period before your telephone call.

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1 A. Yes.  
 2 Q. In terms of -- you give some information in terms of the  
 3 telephone discussion with Mr Berry about the  
 4 Greater Manchester Fire and Rescue Service's response  
 5 and PDAs.  
 6 A. Yes.  
 7 Q. You set out that:  
 8 "[You were] not aware at this time that the initial  
 9 information provided to North West Fire Control was of  
 10 a bomb which had exploded. They had subsequently been  
 11 made aware of an active shooter later."  
 12 And you go on to say:  
 13 "I say that because in my opinion, the PDA should  
 14 have been mobilised in relation to a bomb which had  
 15 exploded."  
 16 A. Yes. There is a bit more background to that to when  
 17 I was writing the statement. I think just for clarity  
 18 now, I think it's entirely reasonable at the time to ask  
 19 the NILO first before resources were mobilised, but only  
 20 on a short-term basis. This goes back to the opening of  
 21 action cards and what was stated at the time that the  
 22 bomb action card was followed.  
 23 Q. You do indicate -- and just to explore what is in the  
 24 witness statement:  
 25 "The Greater Manchester Fire and Rescue Service

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1 response would have been very different if the PDA had  
2 been sent”?

3 A. Yes, absolutely. We'd have had eyes on scene and we'd  
4 have got that full situational awareness very early on.

5 Q. You have also clarified, and just for completeness, that  
6 you would not have sent the explosion PDA to an active  
7 shooter situation?

8 A. No, if we'd have got — if everything was coming  
9 simultaneously that it was an active shooter, I would  
10 not have mobilised the explosion PDA at that point;  
11 it would have been a specialist response.

12 Q. You did go on within the witness statement —

13 SIR JOHN SAUNDERS: Do you mind? Have we left the telephone  
14 call now?

15 MS CARTWRIGHT: Yes.

16 SIR JOHN SAUNDERS: Why are you ringing him? In what  
17 capacity are you ringing him? I don't even know if you  
18 are his boss or senior to him or anything like that.

19 A. I was his line manager. Sir.

20 SIR JOHN SAUNDERS: Is that why you're ringing him?

21 A. I was ringing him — and also this is quite a serious  
22 situation.

23 SIR JOHN SAUNDERS: This is not meant to be critical, and  
24 I understand that, but you have a NILO who is operating  
25 a really serious situation, he's got to talk to all

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1 sorts of people and get things ready, and then you're  
2 ringing him up. I just wonder whether —

3 A. It was more again as a support if he needed anything  
4 from me at the time. As I say, I was off duty, I wasn't  
5 sort of offering anything at that time. I suppose  
6 because I was his line manager, I knew Andy was fairly  
7 new on the rota — that's not to say that he wasn't  
8 fully capable of fulfilling the role, otherwise he  
9 wouldn't have been on the rota. Again, it was more of  
10 a trying to see if any support was needed at the time.

11 SIR JOHN SAUNDERS: I readily understand that and there are  
12 lots of people, I'm sure, who are ready to support and  
13 give help if they can. If you have too many people  
14 ringing the duty NILO then —

15 A. Yes, sir (overspeaking).

16 SIR JOHN SAUNDERS: — it interferes with the normal job as  
17 it were.

18 A. Yes, I agree.

19 MS CARTWRIGHT: You however having set out the view about  
20 deployment and the PDA, you made some observations about  
21 your views about the system that North West Fire Control  
22 was operating. You say this about the action cards:  
23 "The series of action cards for multiple incident  
24 types, which can be confusing, it is not the same levels  
25 service that Greater Manchester Fire and Rescue Service

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1 had been used to when we had our own Control working in  
2 Fire and Rescue Service headquarters previously. In  
3 particular, we had more experienced call handlers who  
4 had a great familiarity with our own procedures and the  
5 geography of Greater Manchester. The system that we put  
6 in place with North West Fire Control is inferior to  
7 what we were used to previously.”

8 A. Yes. That's no criticism of North West Fire Control at  
9 all. That is the system that the Fire and Rescue  
10 Service's put in place. As I say, previously, when we  
11 had our own Control, the procedures were specific to our  
12 Fire and Rescue Service. I think it was — looking  
13 at the action cards it was difficult for North West Fire  
14 Control to disseminate exactly which action card to  
15 follow. Obviously, we would have our command support —  
16 operations room, as we termed it then, would be annexed  
17 to the Control.

18 So it was more about that side of it, really. As  
19 I say, it's no implied criticism of North West Fire  
20 Control at all; that is the system that Fire and Rescue  
21 Services put in place.

22 SIR JOHN SAUNDERS: You just think that the old system was  
23 better?

24 A. Yes, sir.

25 MS CARTWRIGHT: Perhaps briefly we can track a number of

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1 calls before we stop today. We don't see on the  
2 schedule that I displayed a moment ago a call that took  
3 place at 23.16 between you and Mr Lawlor that we touched  
4 upon last week that lasted 1 minute and 67 seconds. So  
5 why, having spoken to Mr Berry, were you then making  
6 contact with Mr Lawlor?

7 A. Mr Lawlor was the, as I say, the lead NILO. Again, he  
8 works in my department. I phoned him up to see —  
9 inform him, basically, of the conversation I'd just had  
10 with Mr Berry and that he was aware that it was a bomb  
11 and an active shooter, so I passed that information on  
12 to him. We had the discussion then as to — like I say,  
13 I was thinking not just of — I was thinking about  
14 a wider incident, if you like, if that makes sense, as  
15 to the structure that's in place. I know it's an  
16 endless source of frustration to you, sir, but as I say,  
17 I didn't ask at the time what time the explosion  
18 occurred, I was working on the assumption that we were  
19 much earlier in the incident than we were. It was just  
20 thinking about again the support that we could provide.  
21 I spoke to Mick about going to the force command module.  
22 Whether that had already been actioned or not I didn't  
23 know. Again, it was just a thought about getting things  
24 in place. So I asked Mick if he'd start making his way  
25 there and I would see if they wanted me in the command

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1 support room.  
 2 Q. In terms of then you being someone who's off duty who is  
 3 now contacting Mr Lawlor with a view to directing him to  
 4 go to the force command module, was it really your role  
 5 to be making those decisions at that time?  
 6 A. No, it wasn't my role. As I say, I was off duty it was  
 7 just a matter of -- well, as I say, trying to help the  
 8 response and if -- I was going to speak to Mr Nankivell,  
 9 who was the duty GM, because I wouldn't just do it  
 10 without speaking to him. If they'd already actioned  
 11 that, I'd have rung Mick up and turned him around.  
 12 Q. But we know that you didn't speak to Mr Nankivell before  
 13 you made contact with Mr Lawlor because your first call  
 14 to Mr Lawlor was 23.16 and it was only then at 23.18  
 15 that you made a call to Mr Nankivell that lasted  
 16 1 minute and 72 seconds.  
 17 A. Yes.  
 18 Q. So why was the order of the calls in the way it was?  
 19 Why didn't you make contact first of all with  
 20 Dean Nankivell?  
 21 A. Again, I was speaking to Mick, see if he was aware of  
 22 the information that I'd received off Mr Berry, and it  
 23 was just an on-the-cuff (sic) suggestion that he goes to  
 24 the force command module. But as I said, I specifically  
 25 said I will check with Dean, the duty NILO -- sorry,

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1 duty group manager to make sure that either nobody else  
 2 has been mobilised to the force command module and they  
 3 actually want us involved. I wouldn't self-deploy.  
 4 Q. Thank you. Before we very briefly deal with that call  
 5 at 23.18, what role did you have in mind that Mr Lawlor  
 6 would be playing at the force command module? In what  
 7 capacity would he be acting there?  
 8 A. He would be the liaison for multi-agency. I would have  
 9 expected later on that we would have a more senior  
 10 manager to work with him, so we'd have -- if you have  
 11 a major incident as such, we'd have sort of a support  
 12 team, so a senior officer, either an area manager or the  
 13 principal officer, would make their way up there to be  
 14 ready then for the strategic coordinating group, and  
 15 a sort of support team, where we'd have a NILO and maybe  
 16 some admin support as well.  
 17 Q. Can I ask you -- we've had a statement provided from  
 18 Mr Keelan that gives his identification of the various  
 19 command positions that individuals were performing on  
 20 the night and into 23 May. He categorises the role that  
 21 Mr Lawlor was discharging that night as an operational  
 22 commander level.  
 23 A. I wouldn't say operational commander myself. At the --  
 24 if there's a TCG that's remote, like I say, our  
 25 commanders tend to be on the scene. We would have

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1 a liaison. But then, if we had a more senior officer,  
 2 they would take up -- and it's a bit difficult for the  
 3 command function because, as I say, operational or  
 4 tactical command is carried out at the scene from the  
 5 Fire and Rescue Service perspective. But if we'd had  
 6 a senior manager up there, they would be sort of our  
 7 strategic commander, if you like, and Mr Lawlor would be  
 8 there as a tactical adviser and a support and also the  
 9 liaison with the other agencies.  
 10 SIR JOHN SAUNDERS: Where you're not at the scene -- and  
 11 you weren't at the scene -- does this cause a problem if  
 12 the operational and tactical commanders are operating  
 13 from the scene?  
 14 A. From being up in the -- well, again, we never envisaged  
 15 that we wouldn't have anybody at the scene, and  
 16 certainly Mr Lawlor was not going up to the force  
 17 command module, in my view, in a command capacity,  
 18 he was going up as a liaison to liaise with the other  
 19 agencies and then to support the senior officer, who  
 20 ultimately should have arrived.  
 21 MS CARTWRIGHT: Can I ask you -- Mr Lawlor had indicated  
 22 that he had assumed that there were already resources  
 23 that had gone to the arena. At the time when you were  
 24 making these first calls to Mr Berry and to Mr Lawlor,  
 25 were you of a similar assumption that there were

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1 resources that had already gone or did you clearly know  
 2 that no pump had been deployed to the arena?  
 3 A. When I initially phoned Mr Berry, I thought we'd have  
 4 had resources on the scene. Obviously, when I got  
 5 the -- had the discussion with him that it was now  
 6 a bomb and an active shooter, he said that they were  
 7 rendezvousing at Philips Park, so at that point I knew  
 8 that we didn't have resources at the arena itself.  
 9 Q. And had you ascertained any information about when the  
 10 explosion had occurred?  
 11 A. No. As I've said to the chair before, again, like many  
 12 of my colleagues, I made the assumption that we were  
 13 early into the incident, but I don't recall asking what  
 14 time the explosion actually occurred.  
 15 Q. Thank you. So finally, before we break today, could  
 16 I ask you just to describe what was discussed with  
 17 Mr Nankivell during the call at 23.18 that lasted  
 18 1 minute and 72 seconds?  
 19 A. Well, basically it was just: did he need any support,  
 20 did he want me -- asked if he wanted me to come to the  
 21 command support room. He said yes, obviously, because,  
 22 again, I had quite a bit of experience with the MTFA  
 23 capability. I asked about Mr Lawlor going to the force  
 24 command module. He said at the time, "I don't want  
 25 anybody self-mobilising". He hadn't sent anybody at

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1 that time, so I said "Right, okay, I'll make my way in,  
 2 I'll book on duty with Control". And I -- I don't know  
 3 when -- looking through the chronology -- I spoke to  
 4 Mick eventually and said for him to carry on and I would  
 5 clear it with Mr Nankivell when I got into the command  
 6 support room.  
 7 Q. In terms of Mr Nankivell, he was a manager that was on  
 8 duty that night; is that correct?  
 9 A. Yes, ma'am.  
 10 Q. So with him being in a position that was on call to  
 11 respond to the incident, he expressly said to you,  
 12 "I don't want Mr Lawlor to deploy"?  
 13 A. Yes, he said, "I don't want anybody self-deploying",  
 14 that's, I think, the words he used to me. But I don't  
 15 know whether he was getting confused as to where I was  
 16 suggesting that Mr Lawlor goes to rather than deploying  
 17 into the arena itself.  
 18 Q. But you set out in your witness statement that you asked  
 19 Mr Nankivell, did he want Mr Lawlor to go to  
 20 GMP Headquarters?  
 21 A. I did, yes, but I thought there might have been a bit of  
 22 confusion there.  
 23 Q. You go on to tell us in the witness statement that  
 24 notwithstanding Mr Nankivell saying he did not want  
 25 Mr Lawlor to self-deploy, you told Mr Lawlor to carry on

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1 and that you would clear it with Mr Nankivell on  
 2 attendance at the CSR?  
 3 A. I did, yes.  
 4 Q. So why did you essentially act in an opposite way to  
 5 that which you'd been directed by an on-call group  
 6 manager?  
 7 A. I think, obviously, because of my role working within  
 8 the LRF, we had -- not saying a better knowledge than  
 9 Mr Nankivell of it, but knew the structure that would be  
 10 in place for the wider incident. We absolutely needed  
 11 somebody in the force command module. I thought we was  
 12 getting ahead of the game because the usual protocol  
 13 is that we would be asked via Control to send somebody  
 14 up and then it would be done through the command support  
 15 room, or maybe even the duty GM, so I suppose I thought  
 16 I was doing him a favour, really, by getting Mr Lawlor  
 17 on his way to the module. Again, the thing with using  
 18 Mr Lawlor himself is he was based up there quite a lot  
 19 of his time, so he knew the desk, the systems, how to  
 20 get into the building.  
 21 Q. But at the time you asked the question of Mr Nankivell,  
 22 he would have equally known that Mr Lawlor was someone  
 23 who worked at Greater Manchester Police headquarters?  
 24 A. Yes, he would.  
 25 Q. And would have known the systems in operation there?

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1 A. He possibly would. Probably not as much as I knew the  
 2 role of Mr Lawlor because, again, Mr Lawlor came under  
 3 my line management responsibility.  
 4 MS CARTWRIGHT: Can we adjourn now until tomorrow, please,  
 5 and continue with Mr Fletcher's evidence at 9.30?  
 6 SIR JOHN SAUNDERS: I'm really sorry to get you back. It  
 7 may have been we thought we were going to finish with  
 8 you today. 9.30, please.  
 9 We have gone over time estimates hugely today.  
 10 I know this is a bit of a recurring theme that I say and  
 11 I'm sorry to keep going on about it. Obviously, it's  
 12 important to look at everything thoroughly, but we line  
 13 up witnesses in accordance with the timetables which are  
 14 happening. We have a timetable set to get to a certain  
 15 stage by the time we actually have a break. I'm keen to  
 16 get there if at all possible. So if everyone could do  
 17 their best to stick to time estimates, I'd be really  
 18 grateful. Probably everybody is guilty of breaking them  
 19 and I know I don't help by asking questions myself, but  
 20 that's my privilege. 9.30 tomorrow. Thank you.

(4.40 pm)

(The inquiry adjourned until 9.30 am  
on Tuesday, 6 July 2021)

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