

OPUS2

Manchester Arena Inquiry

Day 141

September 7, 2021

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Tuesday, 7 September 2021

(9.30 am)

MR RICHARD THOMAS (recalled)
Questions from MR GREANEY

MR GREANEY: Sir, today is 7 September 2021 and it will therefore have struck you and many people that today is the first anniversary of the oral evidence hearings of this inquiry.

Sir, Richard Thomas is back in the witness box and as you will recall, he first gave evidence on 3 February of this year, and I'm going to begin by giving what I hope will be a fair and accurate summary and also a brief summary of the evidence that he gave on that occasion.

Mr Thomas explained when first he was in the witness box that he retired from South Yorkshire Police as a chief inspector in December 2017. Whilst in South Yorkshire Police he had developed considerable expertise in firearms, operating as a firearms officer, a firearms tactical adviser, an operational firearms commander or OFC, and as tactical firearms commander or TFC.

Before his retirement in December 2017, for a period of 4 years from 2013, Mr Thomas had been seconded to

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CTPHQ and its predecessor organisations into the role of head of specialist and counter-terrorism armed policing capabilities, and he explained, sir, to you what that role involved.

He told the inquiry that he had continued in that role following his retirement and indeed he's been able to confirm to me today that he continues in that role as of today's date.

In his evidence, Mr Thomas explained that ACPO TAM, the Association of Chief Police Officers' Terrorism and Allied Matters committee, the predecessor organisation of CTPHQ, had published a guidance document in May 2012 dealing with the policing response to a marauding terrorist firearms attack, as such attacks were known at that stage.

That guidance is at {INQ013767/1} and it marked the creation of Operation Plato. The guidance is entitled "Operation Plato: initial response contingency plan guidance to police forces" and it had emerged out of the marauding terrorist attacks in Mumbai in November of 2008.

Subsequently, explained Mr Thomas, in March 2017 CTPHQ published a refreshed version of that guidance in light of the publication of the third iteration of the joint operating principles in January 2016 and other

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work, in particular the findings of the inspection carried out by HMICFRS.

Sir, you will recall Mr Thomas made plain that although the HMICFRS report was not published until August 2017, the findings of its fieldwork had been communicated to CTPHQ and taken into account in the refreshed guidance, and indeed Mr Buchan was also to explain that to us.

One such finding of the Inspectorate was that in the event of a Plato incident, there was a risk of the force incident manager in GMP, as we know the FDO, becoming overburdened. And generally, of that risk of overburden, Mr Thomas said during the course of his evidence:

"It was always well understood that the FDO role is a role that would come under significant demand and pressure during the early stages of the response to a marauding terrorist firearms attack and so through the guidance there was mitigation offered in respect of that, so it wasn't something that was new to us through Exercise Winchester Accord, it was something that was recognised for some considerable time and so there was mitigation offered through the national guidance around that very point."

So Mr Thomas was making the point that the risk of

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the FDO becoming overburdened was something that had been well-known long before the findings of Exercise Winchester Accord.

The refreshed guidance to which Mr Thomas referred was circulated to all police forces on 23 March 2017 with a letter inviting forces to commission an urgent review of their local Operation Plato responses and the urgency, as was emphasised in that letter, and as Mr Thomas explains in more recent witness statements, should have been obvious because the day before the letter was sent, on 22 March 2017, Khalid Masood drove a vehicle on to a pavement on Westminster Bridge, killing four people and injuring many more, and he then, as everybody knows, crashed the car into the perimeter fence of the palace grounds and ran into New Palace Yard, where he fatally stabbed an unarmed police officer, Keith Palmer, before being shot dead himself.

So, sir, the point Mr Thomas makes in more recent statements is that those events occurred the very day before the letter of Chief Constable Habgood. Mr Thomas made clear to us that there is a hierarchy of plans and policies. At the top, so far as we are concerned, is JESIP, which is applicable to all emergency services. Beneath that, the JOPs, which are focused on MTFAs, applicable to all emergency services. Beneath those,

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1 the CTPHQ Plato guidance applicable to police forces
 2 generally, and then beneath that, individual force Plato
 3 policies applicable, of course, to the force concerned.
 4 Sir, it looked as if you were about to say
 5 something.
 6 SIR JOHN SAUNDERS: I would like to say, as you suggest that
 7 I remember all of this, fortunately I've had
 8 a transcript to be able to look at as well as the
 9 statement of Mr Thomas, so I am sorry if I can't
 10 remember every word you said back then. The one thing
 11 I was puzzled by, and therefore it may be a convenient
 12 time to deal with it, is that there were several
 13 seminars which were organised to assist police forces in
 14 preparing their own Plato plans. They actually took
 15 place very shortly before 22 May; is that right?
 16 A. Yes, that's correct, sir.
 17 SIR JOHN SAUNDERS: I think there were two.
 18 A. Yes.
 19 SIR JOHN SAUNDERS: And although there is urgency, which you
 20 were emphasising, one does need to perhaps say that
 21 these were presumably organised in order to give help in
 22 preparation, so it wasn't anticipated that they would
 23 have been ready, those plans, for 8 May or was it?
 24 A. No, sir, the expectation was that following the
 25 publication of the letter from Chief Constable Habgood,

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1 forces would get on with updating their plans and their
 2 contingency arrangements. However, it was felt that
 3 it would be helpful along that journey to also deliver
 4 the seminars. There was quite a degree of organisation
 5 required to get the seminars in place, get people
 6 invited, et cetera. But as Mr Habgood made clear in the
 7 letter, the expectation was that forces got on with
 8 updating their local plans immediately after receipt of
 9 the letter. The seminars were purely seen as assistance
 10 along the way, if that helps, sir.
 11 SIR JOHN SAUNDERS: That does. I'm sorry to interrupt your
 12 resumé.
 13 MR GREANEY: That's very helpful.
 14 So I understand, the letter of 23 March goes out,
 15 indicating there ought to be an urgent review by force
 16 of their policies, the expectation was that there would
 17 be a recognition of the urgency involved and forces
 18 would get on. There were then seminars on 8 and 11 May;
 19 GMP staff attended on 8 May. Then I think even later on
 20 there was a further phase which were the assurance
 21 visits that were carried out by Inspector Nutter
 22 intended to be in the September but in fact took place
 23 in the July.
 24 A. That's correct, yes.
 25 MR GREANEY: Just to finish off what I hope is a helpful

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1 recap of the evidence on the last occasion. Mr Thomas
 2 dealt when he last gave evidence with an assurance visit
 3 which Inspector Nutter carried out at GMP on 19 July.
 4 One of those to whom Inspector Nutter spoke was
 5 Chief Inspector Michael Booth, and the preparation of
 6 action cards was still in development at that time.
 7 Pausing for one moment, as you'll recall, we heard
 8 from Michael Booth, the chief inspector, on 29 and
 9 30 March. He was a chief inspector in the operation
 10 communications branch between February 2016 and
 11 September 2018 and in that role had oversight of the FDO
 12 position. He explained that he had been tasked with the
 13 creation of action cards in February 2016 and, as
 14 a result, had promptly created such cards. However,
 15 contrary to his wishes, they had not been tested during
 16 Exercise Winchester Accord and had not been embedded, as
 17 Deputy Chief Constable Pilling conceded, by 22 May 2017.
 18 During his evidence Mr Thomas assisted us
 19 in relation to the meaning of on-scene commander, and
 20 we'll come back to that issue later in his evidence
 21 today, and he set out that there had been a number of
 22 Plato declarations: the Westminster attack on
 23 22 March 2017; the attack at the arena on 22 May that
 24 year, of course; the London Bridge attack on
 25 3 June 2017; the stabbing incident at Manchester Arndale

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1 Centre on 11 October 2019; and the Fishmongers' Hall
 2 attack on 29 November 2019. And along with those
 3 declarations there had, he told us, been a small number
 4 of additional incidents when Plato had been declared but
 5 rescinded very quickly.
 6 Sir, finally by way of summary, Mr Thomas explained
 7 the operational role that he played on the night of the
 8 arena attack in his capacity as on-call national
 9 counter-terrorism armed policing adviser.
 10 Against that background, we will remind Mr Thomas,
 11 not that he'll need reminding, that he remains sworn and
 12 seek his assistance on a series of further issues today.
 13 SIR JOHN SAUNDERS: Thank you. That was all very helpful.
 14 Thank you very much.
 15 MR GREANEY: Can I say before we start with the initial
 16 matters that the evidence of Mr Thomas must, unless
 17 absolutely impossible, conclude today. So that is as
 18 much a warning to myself as to anyone because there is
 19 a lot to get through and we will all need to be
 20 efficient.
 21 The order in which we'll deal with the evidence is
 22 as follows. Sir, first of all, throughout the whole of
 23 this morning I am certain, probably into the afternoon,
 24 we will deal with the open evidence that Mr Thomas is
 25 able to give. I will ask my questions first and invite

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1 core participants to ask their open questions as well.
 2 Then after what will be a necessary break we'll go into
 3 a restricted session, I will ask my questions first
 4 again and then I'll invite core participants to ask
 5 their questions in that session.
 6 That's the structure for today. Having dealt with
 7 all of that, Mr Thomas, could I invite you to identify
 8 yourself for the purposes of the recording?
 9 A. Yes, good morning. Richard Thomas.
 10 Q. Have I summarised accurately the evidence that you gave
 11 earlier this year?
 12 A. Yes, you have, thank you.
 13 Q. The order in which I am going to deal with your open
 14 evidence is as follows, so that everyone can know where
 15 we are going: (1), we'll deal with a reminder of the key
 16 elements of JOPs 3, both to provide a context for your
 17 evidence in the restricted session and ahead of the
 18 evidence of the policing experts next week. (2), we'll
 19 deal with a reminder of the key elements of the
 20 refreshed guidance ahead of that evidence for the same
 21 reasons.
 22 Thirdly, we'll deal with the issue of zoning in
 23 further detail. So hot, warm and cold zones during
 24 a Plato incident.
 25 Fourthly, we'll deal with what I will describe as

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1 the Dexter/Nawaz issue.
 2 Fifthly, we'll deal with Exercise Winchester Accord.
 3 Sixth, with the current JOPs and national Plato
 4 policy, to the extent that they can be dealt with in
 5 open.
 6 And seventh and finally, we'll deal with the steps
 7 that CTPHQ has taken to learn the lessons of the attacks
 8 of 2017 and also a further report of the Inspectorate.
 9 I hope that that makes sense as an approach.
 10 A. It does, thank you.
 11 Q. Before we get to that, I know there was something you
 12 thought would be helpful to add in relation to what you
 13 told us on the last occasion about your background and
 14 experience, so I'll just lead this from you.
 15 You explained to us previously, and as I've just
 16 summarised, that you worked in armed policing roles
 17 continually from 1998.
 18 A. That's correct.
 19 Q. What you didn't tell us about on the last occasion was
 20 that you spent 2 years also working for the College of
 21 Policing.
 22 A. I did.
 23 Q. And the capacity in which you worked at the college was
 24 what?
 25 A. I was the national lead for the training delivered to

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1 operational firearms commanders, tactical firearms
 2 commanders, firearms tactical advisers and force
 3 incident managers.
 4 Q. Was that the role that you undertook before in 2013 you
 5 took up your current role at CTPHQ?
 6 A. Yes, immediately before.
 7 Q. So let's begin with those seven topics then and JOPs 3.
 8 Is it fair to say that the starting point is that
 9 JOPs 3 represents the principles by which all three
 10 emergency services are expected to operate?
 11 A. That's correct.
 12 Q. So this is not a policing specific document, it relates
 13 to all three, fire, ambulance and police?
 14 A. That's correct, yes.
 15 Q. Do the JOPs build on JESIP in order to provide specific
 16 principles to inform the emergency services' response to
 17 an MTFA, as it used to be called?
 18 A. Yes, very much so. The JESIP doctrine is seen as the
 19 bedrock upon which the joint operating principles are
 20 then built, so the two documents are very much
 21 interrelated and to be seen together.
 22 Q. The version of JOPs that was in force at the time of the
 23 arena attack was, as I've indicated, edition 3?
 24 A. That's correct.
 25 Q. Which was dated 3 January 2016?

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1 A. Yes.
 2 Q. And we'll go through some parts of it now. Mr Lopez,
 3 the INQ reference is {INQ008372/1}.
 4 As you will appreciate, we most certainly aren't
 5 going through to go every word of this, I'm just going
 6 to pick up on the particular parts of it that seem to be
 7 most relevant in the light of the issues as they have
 8 developed during the course of the evidence.
 9 A. Yes.
 10 Q. Mr Lopez, could we go to {INQ008372/2}, first of all,
 11 please. The top half of the page, second paragraph.
 12 It is made plain that the JOPs have been developed to
 13 set out the response to an MTFA.
 14 A. Yes.
 15 Q. But it goes on to say in the final sentence:
 16 "In non-terrorist attacks of a similar nature these
 17 principles may still deliver an effective response and
 18 consideration should be given to their use."
 19 A. That's correct, and it also makes the point about being
 20 used to inform existing major incident procedures.
 21 Q. So is it fair to conclude from that that whilst the JOPs
 22 were designed specifically for a terrorist incident
 23 involving a marauding terrorist with a firearm, it was
 24 understood that they might provide assistance
 25 in relation to other forms of terrorist attack?

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1 A. Yes, that's correct.

2 Q. And also they might provide assistance in relation to

3 other non-terrorist attacks of a significant or major

4 nature?

5 A. Yes, commanders may feel that some of those principles

6 would be applicable in those other scenarios, but the

7 documentation was specifically focused on a marauding

8 terrorist firearms attack at that time.

9 Q. Next, please, Mr Lopez, can we go to the glossary at

10 {INQ008372/4}.

11 We'll just look again at the definition of certain

12 terms given that we now have a clear understanding of

13 their role on the night of the arena attack.

14 First of all, casualty clearing station:

15 "An entity set up at the scene of an emergency by

16 the Ambulance Service in liaison with the medical

17 incident adviser to assess, triage and treat casualties

18 and direct their onward removal."

19 A. That's correct.

20 Q. And then the casualty collection point:

21 "A staging point that enables life-saving

22 interventions to be undertaken before removal to the

23 casualty clearing station."

24 A. That's correct.

25 Q. Then the first of a number of terms we'll look at

1 closely today. The cold zone:

2 "An area where it has been assessed that there is no

3 immediate threat to life."

4 A. Yes.

5 Q. Further down that page, hot zone:

6 "Where the attackers are present and/or there is an

7 immediate threat to life."

8 A. Yes.

9 Q. The way in which you summarised the hot zone when you

10 last gave evidence was that that was, and you put it

11 very bluntly, the area in which the killing would be

12 expected to be taking place, the killing of the

13 terrorist .

14 A. The killing by the terrorist .

15 Q. Killing by the terrorist .

16 The next term, limits of exploitation or LOE:

17 "The LOE is the border between the hot and warm

18 zone. It is the furthest point to which some specialist

19 emergency responders will operate. The LoE will be

20 jointly agreed between on-scene commanders as part of an

21 ongoing joint assessment of risk."

22 A. Yes.

23 Q. So this is the idea that the commanders from the three

24 services have a JESIP huddle, they decide what the

25 limits of exploitation are, and they decide jointly

1 where specialist resources can be deployed to?

2 A. Yes.

3 Q. Over the page, {INQ008372/5}, on-scene commander,

4 a term, as you will know, that has been the subject of

5 a good deal of analysis:

6 "An appropriate police, FRS or ambulance commander

7 at the scene who is responsible for undertaking an

8 ongoing joint assessment of risk and for decision-making

9 on the deployment of their organisation's assets at that

10 location. On-scene commanders will therefore ensure the

11 emergency services' response is effectively coordinated

12 at scene."

13 Is that correct?

14 A. That's correct.

15 Q. Again, this is the sense which emerges, do you agree,

16 very strongly from JOPs and from the national Plato

17 guidance that what is critical as part of a response is

18 joint working by the emergency services?

19 A. Yes, absolutely.

20 Q. Then the final definition that we'll need to look at,

21 warm zone:

22 "Where the attackers are believed to have passed

23 through but could enter/re-enter imminently. These

24 areas cannot be guaranteed as safe."

25 A. Correct, yes.

1 Q. Can we go over the page next, please, to {INQ008372/6}

2 --

3 SIR JOHN SAUNDERS: Can I just check something about the

4 warm zone? As you may well be aware, we've had a number

5 of competing definitions of what a warm zone is. One of

6 the things which has arisen is whether in deciding

7 whether somewhere is a warm zone or a cold zone, you

8 should take into account the risk of there being further

9 unexploded bombs. There seemed to be a difference of

10 opinion depending on which service you're talking to.

11 What's the answer?

12 A. So the guidance at this time was very much talking about

13 an ongoing threat to life, so that marauding element to

14 it. The expectation would be that if you were dealing,

15 and I use the term very carefully, but purely with an

16 explosion, an explosive device, and you know that for

17 a fact, then there are or there is other guidance that

18 you would look to that directs how the emergency

19 services should deal with that kind of incident and

20 information in terms of cordons that should be put in

21 around the potential explosive device.

22 MR GREANEY: Just to give you some reassurance, sir, when we

23 come to the third topic, we're going to look in detail

24 at the question of, in a situation in which armed police

25 have gained control over an area and there is nothing

1 specific to indicate that there is an explosive device,
 2 whether that is a hot, warm or in fact a cold zone.
 3 SIR JOHN SAUNDERS: Right. It's just really because we're
 4 dealing with the definition —
 5 MR GREANEY: Yes, sir.
 6 SIR JOHN SAUNDERS: — and it seemed to be appropriate to
 7 try and establish that at this stage.
 8 MR GREANEY: I wasn't for a moment criticising your
 9 question. It is obviously of a high degree of
 10 importance that we should be as clear as possible about
 11 whether the City Room was hot, warm or cold at various
 12 stages.
 13 SIR JOHN SAUNDERS: Right. Looking at this guidance now in
 14 the light of what happened in May 2017 and the responses
 15 you've heard from various people or know about at this
 16 inquiry, do you think there was ambiguity there?
 17 A. In the guidance?
 18 SIR JOHN SAUNDERS: Yes.
 19 A. I don't think there was, sir. That would be my personal
 20 view on that.
 21 MR GREANEY: Again, that obviously is an issue we need to
 22 look at. So the question of whether JOPs 3 was too
 23 prescriptive or sufficiently clear, and we're going to
 24 get to that topic very quickly indeed, but first of all
 25 {INQ008372/6}, and the paragraph starting:

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1 "The features of this type of attack [so an MTFA]
 2 could result in it being sustained for an extensive
 3 period of time and whilst such an incident is ongoing
 4 there will be a continued threat to life. Uncertainty
 5 about the attack locations, intent and capability of the
 6 terrorists means that the management of life-saving
 7 interventions may be much more difficult than for other
 8 major incidents."
 9 Then this:
 10 "It may require emergency service personnel to
 11 operate in locations that will not have been declared
 12 completely safe."
 13 A. Yes.
 14 Q. Next, can we go to {INQ008372/8}, please, and to
 15 a passage that may be important in terms of assessing
 16 what you have said about whether JOPs were sufficiently
 17 clear.
 18 It reads:
 19 "The JOPs on the following pages enable commanders
 20 at the scene to identify cold/warm/hot zones and limits
 21 of exploitation which are critical to the timely
 22 deployment of specialist personnel for the purpose of
 23 treating and evacuating casualties."
 24 So important therefore that you identify zones as
 25 soon as possible?

18

1 A. Yes.
 2 Q. Because that will be of a high degree of importance in
 3 determining what emergency service personnel can go
 4 where?
 5 A. Yes, it's an enabler for the commanders in terms of how
 6 they will deploy their staff with that priority of
 7 saving life.
 8 Q. Then the JOPs go on to say:
 9 "The principles detailed in this document are not
 10 prescriptive [my emphasis] but are intended to provide
 11 an overarching framework for a standardised approach
 12 across the UK. They act as guidance to resilience
 13 planners and emergency responders in the development and
 14 implementation of local response plans that are
 15 consistent with the national approach and interpretation
 16 of the risk."
 17 So it's really that term "not prescriptive" that
 18 I want to consider with you. Would it be fair to say
 19 that the basic rule under JOPs and indeed the national
 20 Plato policy was at this time that only armed officers
 21 should enter the hot zone?
 22 A. Yes.
 23 Q. That the basic rule was that only specialist
 24 Ambulance Service and Fire and Rescue Service resources
 25 should enter the warm zone?

19

1 A. Yes.
 2 Q. That everyone else as a basic rule should not venture
 3 beyond the cold zone?
 4 A. Yes, although there are caveats to that contained within
 5 the document.
 6 Q. And I was going to say, does the reference to the rules
 7 not being prescriptive accommodate the prospect that
 8 those basic rules might be relaxed if the circumstances
 9 demanded it?
 10 A. Yes, as I'm sure the inquiry will understand, and the
 11 chair will understand, every significant major incident
 12 that the emergency services deal with is unique and so
 13 all of the guidance, certainly to police commanders, is
 14 intended not to be prescriptive so that it is an enabler
 15 for those commanders to exercise their judgement based
 16 on what they can see unfolding before them. So it's
 17 very much another tool within the toolbox alongside the
 18 other pieces of a doctrine that would guide a police
 19 commander in responding to an incident of this nature.
 20 Q. So the way in which you put it was that certainly that
 21 is the understanding you would expect police to have?
 22 A. Yes.
 23 Q. But as you agreed earlier, the JOPs are not specific to
 24 the police, they are for all three emergency services?
 25 A. Indeed.

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1 Q. And your understanding of the use of that term "not
 2 prescriptive" is that it's intended to accommodate the
 3 prospect that there might be circumstances in which
 4 those basic rules would not apply?
 5 A. Yes, indeed.
 6 Q. So the next question therefore is: how is a decision to
 7 be made about when those basic rules need not be
 8 followed?
 9 A. Again, I would refer them as principles rather than
 10 rules. As I think the inquiry has heard on a number of
 11 occasions, all of the commanders should be utilising the
 12 joint decision-making model, the JDM. The JDM, or in
 13 police terminology the national decision model, the NDM,
 14 should be utilised to drive the decision-making. That
 15 decision-making is then informed by the various pieces
 16 of guidance that would be relevant to that event. But
 17 it's ultimately that JDM or NDM that should drive the
 18 decision-making of the commanders.
 19 Q. Let me just make sure I've understood this. You have
 20 spoken about the decision-making of the commanders. Am
 21 I correct that you're not taking about commanders
 22 making individual decisions in silos, you're talking
 23 about the JESIP huddle, as it's been described, so the
 24 commanders are getting together, are making a joint
 25 assessment of risk, and deciding the extent to which the

1 principles need to be applied strictly?
 2 A. That's correct.
 3 Q. Or whether the circumstances call for some different
 4 approach?
 5 A. Yes.
 6 Q. What you have described to us is I think what you
 7 summarise in your third statement, so your statement of
 8 1 July 2021 at paragraph 6 as follows. You said:
 9 "The guidance is therefore designed to reflect the
 10 complexity of command, providing a framework and a set
 11 of principles to enable dynamic command decisions rather
 12 than being prescriptive and formulaic."
 13 A. Yes, that's correct.
 14 Q. That's, as you will appreciate, an important issue that
 15 I want to return to with you later on in your evidence.
 16 Next, please, Mr Lopez, {INQ008372/9}.
 17 Paragraph 4.2. This features in a number of places:
 18 "The police will inform emergency service partners
 19 immediately once an MTFAs has been declared to enable the
 20 Fire and Rescue Service and ambulance services to put
 21 their contingency plans into effect. As soon as the
 22 police have declared an MTFAs, the ambulance and FRS
 23 control rooms should be notified immediately. It is
 24 imperative that this action is undertaken
 25 straightaway..."

1 So it seems clear that a critical feature is that as
 2 soon as an MTFAs has been declared, one would expect by
 3 the FDO, that should be communicated to emergency
 4 service partners?
 5 A. Yes, so that it enables that joint effective response.
 6 Q. Because unless they are told, how is risk jointly to be
 7 assessed?
 8 A. Exactly.
 9 Q. Next, please, {INQ008372/11}, paragraph 4.5.
 10 SIR JOHN SAUNDERS: We will come back at some stage, will
 11 we, to the individual circumstances of this case or not?
 12 Is that to be left to the experts?
 13 MR GREANEY: Sir, my plan in relation to Mr Thomas is that
 14 I am not going to draw him into any debate that arises
 15 on the facts of our case. I'm just going to ask him to
 16 assist us with the general principles to be derived from
 17 the policy documents that he's familiar with.
 18 SIR JOHN SAUNDERS: Okay. I just want to ask what is
 19 a general question but obviously relates to this. If
 20 it's inappropriate, someone is to tell me that.
 21 You've allowed for the discretion, these are
 22 guidance. An FDO decides that the result of notifying
 23 the other emergency forces may be that lives will be
 24 lost. Is that a justification for not following that
 25 rule or is it inappropriate for this witness to answer

1 that?
 2 MR GREANEY: Sir, when I said --
 3 SIR JOHN SAUNDERS: I just want to know.
 4 MR GREANEY: It's entirely appropriate for the witness to be
 5 asked a question such as that.
 6 A. I struggle to foresee circumstances where sharing
 7 information to enable joint effective response wouldn't
 8 be the right thing to do.
 9 SIR JOHN SAUNDERS: Okay. That's avoided the question.
 10 A. Sorry, sir, it wasn't intended to. I'm just trying not
 11 to get drawn into specifics.
 12 SIR JOHN SAUNDERS: I'm not meaning to be rude and I'm not
 13 suggesting you were deliberately intending to do that.
 14 A. I'm happy to try and say more if you think that would be
 15 helpful.
 16 SIR JOHN SAUNDERS: No, let's leave it at that for now. We
 17 may come back to it.
 18 MR GREANEY: I might just ask a follow-up question. As
 19 we are going to see when we look at the national policy,
 20 the key priority or the first priority at any stage
 21 in the response to an MTFAs is saving lives.
 22 A. Absolutely, yes.
 23 Q. Obviously, one also has to consider the risk to the
 24 emergency services depending on the decisions, but
 25 number 1 in the list, as we will see, is saving lives?

1 A. Yes. The number 1 objective of the strategy will be to
 2 save life .
 3 Q. So that once an MTFA has occurred or is believed to have
 4 occurred, and Plato has been declared, that is what
 5 should be the focus of everybody?
 6 A. Yes.
 7 Q. That declaration should be communicated to other
 8 emergency service partners?
 9 A. Yes.
 10 Q. To enable them to make joint decisions?
 11 A. Yes.
 12 Q. Those joint decisions being focused first and foremost
 13 on saving the lives of the public?
 14 A. Yes.
 15 Q. Are you, having, I know, given this a lot of thought,
 16 able to identify , and we're just taking a step back
 17 really from the chairman's question, are you able to in
 18 your own mind identify any circumstances in which there
 19 is or may be an MTFA underway in which the sharing of
 20 information would make the loss of the lives of the
 21 public more likely rather than less likely ?
 22 A. I can foresee no circumstances where the sharing of that
 23 information would do anything other than enable a more
 24 effective response.
 25 Q. Is that why you said to the chairman a moment ago, and

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1 in fact said when you gave evidence on the last
 2 occasion, that you struggle in your mind to identify any
 3 circumstances in which an FDO could justify not
 4 communicating and sharing the declaration with emergency
 5 service partners?
 6 A. No. I absolutely remain of that view.
 7 SIR JOHN SAUNDERS: So is the conclusion from that that
 8 because you can't contemplate it ever being the case,
 9 that is in effect a mandatory requirement to which no
 10 exception is made or are you allowing for the
 11 possibility of an individual coming across circumstances
 12 which you haven't contemplated where it would be
 13 justified ?
 14 A. As I've said, all of this documentation is guidance,
 15 they are principles to inform a JDM or NDM decision.
 16 But with my experience I am really, really struggling to
 17 foresee any set of circumstances where the sharing of
 18 that information would not be the right thing to do in
 19 order to inform an effective response to save life .
 20 SIR JOHN SAUNDERS: Thank you.
 21 MR GREANEY: The point you're making is the job of
 22 commanders is to make decisions which are focused on
 23 saving lives and the way in which you facilitate that,
 24 I think this is a point you're making, is by ensuring
 25 that they have the information to make informed

26

1 decisions?
 2 A. Yes, indeed.
 3 Q. {INQ008372/11}:
 4 "The police control room will as a matter of
 5 priority liaise with ambulance and FRS control room
 6 managers to jointly agree a rendezvous point for the
 7 initial response."
 8 And then there is further detail given about the
 9 need for an RVP over the following two pages. What is
 10 the importance in a Plato response of the RVP?
 11 A. So that the relevant resources can be marshalled and
 12 then can be ready and available for deployment, either
 13 by the commanders when they are co-located at the FCP or
 14 it may be prior to the co-location of commanders that
 15 the control room base commanders make a decision to
 16 deploy those resources. So it's the marshalling and
 17 coralling of the resources ready to be deployed in an
 18 effective manner.
 19 Q. You mentioned along the way of that answer the FCP as
 20 well. It would be helpful to have your evidence about
 21 the relationship in terms of JOPs 3, not now, the
 22 relationship between a rendezvous point and a forward
 23 command point.
 24 A. The rendezvous point is where the resources should be
 25 initially marshalled. The FCP is where the commanders

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1 from the three services should co-locate and there they
 2 should make the decisions about the deployment of those
 3 resources.
 4 Q. Should the FDO be the person in the control room making
 5 a decision about where both the RVP and the FCP should
 6 be?
 7 A. In those initial stages, yes.
 8 SIR JOHN SAUNDERS: That's not what it says. One of my
 9 concerns about some parts of JOPs -- I well understand
 10 JESIP and the principles of trying to discuss things and
 11 agree things. What we actually -- what happens if they
 12 don't agree? So can the FDO say, "Right, you're going
 13 there, that's what I'm nominating, I don't care whether
 14 you don't think it's a good rendezvous point"? I know
 15 this is rather going on to the facts of this case, but,
 16 "I don't want to send my fire engine there because it's
 17 too close, it is dangerous to send them there as
 18 a rendezvous point".
 19 A. So there should be a mature, informed discussion between
 20 the three control rooms or the three commanders about
 21 where the RVP is going to be located. If one partner
 22 suggests one location and another partner offers a view
 23 and some rationale as to why that's not appropriate,
 24 then I would expect that that would be considered. In
 25 my experience, I struggle to remember any occasion where

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1 the emergency services hadn't been able to agree an RVP,
 2 but I fully accept --
 3 SIR JOHN SAUNDERS: You can remember 22 May 2017 and they
 4 didn't agree there on an RVP point.
 5 I'm sorry to be difficult about it, but it just
 6 seems to me, as we have found in this inquiry, you can
 7 have a very mature discussion, you can have very
 8 informed people, but you can't always get agreement. So
 9 what happens where there's no agreement? Sorry, I'm
 10 delaying things.
 11 MR GREANEY: Not at all, sir. I'm just checking on the
 12 time.
 13 A. Each commander is responsible for the deployment of
 14 their organisation's assets, so I would imagine that if
 15 that discussion takes place and there is disagreement,
 16 they really need to try and work through that. But if
 17 they can't work through that then ultimately the
 18 commander is only responsible for their own
 19 organisation's assets, and so if a police commander
 20 feels that a certain RVP is the right RVP, then I would
 21 imagine that they would continue with that decision
 22 about that's where the police RVP will be. But as
 23 I say, you know, everything indicates that it needs to
 24 be a joint RVP or series of RVPs to enable that
 25 effective response. The guidance envisages that those

1 commanders will be able to agree an appropriate location
 2 for the RVP.
 3 SIR JOHN SAUNDERS: What we've, I think, discovered in the
 4 evidence is actually if you don't have a joint RVP, the
 5 whole thing falls down. The whole thing just stops at
 6 that point. I just wonder whether one needs to make
 7 some sort of allowance for, if you can't agree, it's the
 8 police that do it and you do what they say.
 9 A. I think that's potentially quite a difficult position to
 10 adopt. The guidance would need to secure the strategic
 11 agreement of all three services to write that into the
 12 guidance.
 13 SIR JOHN SAUNDERS: I'm sure.
 14 A. Because clearly, as the inquiry will well understand,
 15 one organisation can't be responsible for the deployment
 16 of another organisation's assets. So whether that
 17 agreement could be reached nationally and it could be
 18 written into the guidance that all three emergency
 19 services, where there is disagreement about an RVP or
 20 FCP, will ultimately go with the police decision -- it's
 21 an interesting point, sir. I'm not sure that I can
 22 actually answer that at this stage.
 23 SIR JOHN SAUNDERS: I do understand in the vast majority of
 24 cases, after mature discussion, agreement will be
 25 reached, but we have an example where it wasn't.

1 A. Yes, I understand that, sir.
 2 MR GREANEY: I am certain you will be aware of what happened
 3 on the night of the 22nd and I am certain therefore
 4 you've followed the chairman's point that unless there
 5 is a joint RVP established and moreover unless there is
 6 a joint FCP established, then the JOPs/JESIP are not
 7 going to work are they or are very unlikely to work?
 8 A. Unlikely to work, but of course there is still the
 9 option for that joint decision--making to be done via
 10 Airwave radios other, the communications --
 11 SIR JOHN SAUNDERS: Absolutely.
 12 A. So if for some reason those RVPs/FCPs can't be
 13 established, because it will take some little time to
 14 establish them anyway, and you would expect that those
 15 three organisations are sharing information prior to
 16 them being established, so that could be a default.
 17 SIR JOHN SAUNDERS: I do understand that given proper
 18 communications that it could work. As you happen to
 19 know that didn't work on the night either, so that needs
 20 to work. Okay, thank you.
 21 MR GREANEY: I believe that what you're saying is that
 22 whilst, obviously, you in the witness box there can't
 23 make a commitment on behalf of the three emergency
 24 services, nor would we invite you to do so, you are
 25 acknowledging that this issue of having a mechanism by

1 which one of the emergency services, one would have
 2 thought the police, trumps the views of the others,
 3 that is something which is worth considering?
 4 A. Yes, it should be considered. How achievable that will
 5 be, I am not sure. But yes, certainly it is something
 6 that should be considered.
 7 Q. Just following through this exercise of reviewing
 8 JOPs 3, could we go next, please, to {INQ008372/15}.
 9 Paragraph 4.12:
 10 "The boundaries of the hot, warm and cold zones must
 11 be frequently reviewed."
 12 Why, Mr Thomas, is that of importance?
 13 A. Because circumstances will constantly change and evolve,
 14 the circumstances on the ground. So it's important that
 15 the command decisions are keeping pace with what's
 16 evolving on the ground, so there needs to be that
 17 continual review of the application of the zones.
 18 Q. Obviously there may be circumstances in which
 19 a particular location at one stage is a hot zone, but
 20 does it follow from what you have said that the whole of
 21 that area does not need to be a hot zone for the whole
 22 of the time, that it might, for example, be possible
 23 that the size of the hot zone will over time be able to
 24 be made smaller with intervention by armed officers?
 25 A. Yes, that's what the police will be seeking to achieve,

1 is to — and I think the documentation actually makes
2 that point, that the endeavour should be to turn
3 everything from hot to warm and from warm to cold so
4 that the commanders are able to deploy as many assets as
5 possible into that location to assist with life-saving
6 activity .

7 Q. Next, {INQ008372/17}, please.

8 If I'm skipping over this too quickly, sir, I do
9 hope you'll tell me.

10 SIR JOHN SAUNDERS: I will intervene.

11 MR GREANEY: Paragraph 4.16, this is to return to a point
12 you were making earlier:

13 "Emergency personnel who are not in possession of
14 full ballistic protection (ballistic body armour and
15 helmets) for the threat will not normally be deployed
16 into warm zones. A police commander, however, may
17 consider that the prevailing circumstances require that
18 unarmed officers with standard personal protective
19 equipment (PPE) be deployed to support warm zone
20 activity ."

21 The first sentence I read out:

22 "Emergency personnel without full ballistic
23 protection ... will not normally deploy into warm zones."

24 That seems to accommodate the possibility you
25 described earlier that there may be circumstances in

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1 which the basic principle does not apply.

2 A. Yes.

3 Q. But then the following sentence:

4 "A police commander, however, may consider that the
5 prevailing circumstances require that unarmed officers
6 with standard PPE be deployed to support warm zone
7 activity ."

8 On the face of it, that seems to relate only to
9 police officers and not to emergency service personnel
10 more generally?

11 A. Yes, that follow-up paragraph, yes, very much so.

12 Q. So is there any risk of confusion in that paragraph, by
13 which I mean confusion that whereas it may be intended
14 to apply to all emergency service personnel, it then
15 refers specifically to police personnel?

16 A. The intention was that the first statement is the
17 overarching statement and then some further context is
18 provided in terms of assisting police commanders to
19 reach decisions. That was the intention, the way that
20 was written.

21 Q. Next, please, can we go to {INQ008372/22}, which is
22 a section dealing with casualty management:

23 "This section provides operational guidance for the
24 management of casualties by specialist emergency service
25 personnel. These personnel must be equipped with

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1 appropriate PPE and be in receipt of training to enable
2 their deployment into areas that cannot yet be declared
3 completely safe (warm zones)."

4 Over the page, {INQ008372/23}, paragraph 6.1:

5 "The initial priority of the casualty management
6 process is to provide immediate life-saving
7 interventions within warm zones to as many casualties as
8 possible within the shortest possible time frame. This
9 is in order to maximise survival time until definitive
10 care can be provided."

11 A. Yes.

12 Q. Then it states:

13 "Article 2 of the European Convention on Human
14 Rights, as enshrined in the Human Rights Act 1998...
15 This is a qualified rather than absolute right."

16 As I think the chairman has previously observed,
17 that would not be a conventional interpretation of the
18 requirements of Article 2, which generally is regarded
19 as being an absolute right.

20 SIR JOHN SAUNDERS: Actually, I'm not the only lawyer in the
21 room who has made that observation as well.

22 MR GREANEY: I think most lawyers would agree that that —

23 SIR JOHN SAUNDERS: An unusual interpretation.

24 A. Yes, I agree, sir .

25 MR GREANEY: That is something that certainly needs to be

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1 looked at. 6.2:

2 "The Ambulance Service retains lead responsibility
3 for the management of casualties during an MTF. A.
4 However, decisions on whether to deploy staff into warm
5 zones will be made as part of a joint assessment of risk
6 process conducted by the police, FRS and ambulance
7 on-scene commanders."

8 So again, is this the sense that of course the
9 Ambulance Service will have the lead responsibility for
10 dealing with casualties, but decisions about which staff
11 are to be deployed into which areas should be the result
12 of a joint assessment of risk?

13 A. Yes, it should, accepting the point I was making earlier
14 that nothing can take away the responsibilities of the
15 individual employer organisation around the duty of care
16 to their staff .

17 Q. Over the page to {INQ008372/24}, please —

18 SIR JOHN SAUNDERS: Sorry, can we just go back to 6.2?

19 The reference there to the Health and Safety at Work
20 Act and the Health and Safety at Work Regulations and
21 perhaps the pressures that puts on people. Perhaps
22 a degree of pressure against using your discretion if
23 you think you should go outside JOPs?

24 A. I think, sir, that's intended to make the point that

25 I was just making about whilst it would be a joint

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1 decision about what that deployment should look like,
 2 you can't take away that responsibility of the
 3 individual organisation in terms of their duty of care
 4 to their staff .
 5 SIR JOHN SAUNDERS: I appreciate that, but what's come up
 6 perhaps in the inquiry is if you're an individual
 7 commander or someone in one of these happenings going
 8 on, you're going to be much safer from the point of view
 9 of a possible prosecution if something goes wrong if
 10 you're following JOPs than if you're exercising
 11 a discretion to go outside it . Do you think that's
 12 a pressure or perhaps you don't think it is?
 13 A. I think that the overriding pressure, sir, is that duty
 14 to save life . I think all three emergency services, and
 15 certainly commanders, should understand that, should
 16 understand that they have that Article 2 duty to protect
 17 life and they need to balance that against their
 18 responsibilities to their own staff and then they need
 19 to make informed decisions about what that looks like on
 20 the basis of the prevailing circumstances. It's the
 21 weight of command, sir.
 22 SIR JOHN SAUNDERS: I hope you understand, and I don't want
 23 to be misunderstood, I'm not suggesting for a moment
 24 that any of the emergency services don't put their lives
 25 on the line in order to save people. I'm just pointing

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1 out where other pressures may come from.
 2 MR GREANEY: I don't know if you're aware that the inquiry
 3 has heard evidence from, according to my recollection,
 4 at least two witnesses who have described this sort of
 5 defensiveness, a concern that if they make a decision
 6 not to apply the basic principle but instead to deploy
 7 non-specialist resources into a warm zone and it were to
 8 go wrong, there might be very serious consequences for
 9 them.
 10 A. So again, I hope it's helpful, but I would come back to
 11 the point that these are principles, that it's all
 12 guidance to inform that dynamic decision-making and what
 13 commanders are taught around their decision-making
 14 process is that if they do the right — what they
 15 believe to be the right thing in light of all the
 16 circumstances, then that should be supported by their
 17 organisations. But again, I do come back to the term
 18 that I used a few seconds since about the weight and
 19 responsibility of command. It's a very complex and
 20 demanding role to be in a command position during an
 21 incident such as occurred at the Manchester Arena.
 22 SIR JOHN SAUNDERS: Thank you.
 23 MR GREANEY: So {INQ008372/24}, Mr Lopez, next, please, and
 24 paragraph 6.4, which takes us to an issue we were
 25 exploring before the summer break:

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1 "Where ambulance personnel are present with other
 2 emergency service personnel in a warm zone, they will
 3 direct and coordinate the casualty management process,
 4 including the use of non-ambulance emergency responders
 5 to deliver life-saving care."
 6 So does that involve JOPs expecting that the
 7 ambulance personnel will not only direct and coordinate
 8 the response of their own personnel but also direct the
 9 response of other non-ambulance emergency responders?
 10 A. Yes, they are the lead organisation in terms of that
 11 provision of casualty care.
 12 Q. And by non-ambulance emergency responders, does JOPs
 13 intend to capture, for example, police and Fire and
 14 Rescue Service?
 15 A. Yes.
 16 Q. First aiders who may be present in the area, contracted
 17 first aiders?
 18 A. Yes, I believe so.
 19 Q. And even members of the public who may be there?
 20 A. Yes, I believe so.
 21 Q. Paragraph 6.5:
 22 "The decision to deploy emergency responders for the
 23 treatment and extrication of casualties situated in warm
 24 zones should not be delayed by the absence of one of the
 25 three emergency services."

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1 What does that mean?
 2 A. That's the point about the absence of one commander not
 3 delaying activity by the emergency services. So the
 4 commanders that are in a position to undertake that
 5 joint assessment of risk should do so, and again that
 6 plays to that primary aim of the strategy, which is to
 7 save life .
 8 Q. Then the final part of JOPs that I want to refer you to
 9 takes us to an issue that the chairman has been
 10 interested in, namely the position of bystanders in the
 11 course of an Operation Plato response. Could we go to
 12 {INQ008372/25}, please, paragraph 6.6:
 13 "During the course of an attack, uninjured people
 14 may not wish to leave casualties. Given the hazardous
 15 nature of warm zones, it is necessary that bystanders be
 16 directed to leave the scene by the safest and quickest
 17 route possible. It should be recognised that friends
 18 and relatives of casualties may not want to do that.
 19 Where bystanders refuse to leave and are actively
 20 treating casualties, then advice should be given on
 21 treatment and dressings provided (there may be off-duty
 22 emergency service or NHS staff or trained first aiders
 23 at the location)."
 24 A. That's correct.
 25 Q. So that would be the expectation for bystanders in the

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1 warm zone, direct them to leave, but if they won't, try
 2 to provide them with assistance?
 3 A. Yes.
 4 Q. What about the position of bystanders in a hot zone?
 5 A. So obviously, this section of the JOPs is considering
 6 that activity in the warm zone. However, I think the
 7 principles are equally applicable to the hot zone. This
 8 is all predicated on those strategic aims in terms of
 9 minimising the risk to the public and maximising the
 10 safety of the responders. So in minimising the risk to
 11 the public, the emergency services have got a duty to
 12 direct those individuals to leave that area because by
 13 the very nature of it, there is a risk to those
 14 individuals. However, it's acknowledging that there
 15 will be occasions where bystanders will not want to do
 16 that, where, as we have seen many times, and certainly
 17 at the Manchester Arena, unbelievable heroic acts by
 18 members of the public, off-duty NHS staff, et cetera,
 19 and others who will want to remain there and render
 20 first aid, and the JOPs recognise that and says that
 21 we have that responsibility to direct them to leave
 22 because we have a duty to minimise the risk to them, but
 23 accepting that they may not wish to do so, then the JOPs
 24 go on to provide that advice to responders in terms of
 25 doing what you can to then enable those individuals to

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1 continue rendering first aid and save life.
 2 SIR JOHN SAUNDERS: Right. The fact that it's applied to
 3 the warm zone but not applied to the hot zone, is that
 4 a thing that could cause confusion?
 5 A. Yes, I think it is, with hindsight, sir. It probably
 6 would have been more helpful if the documentation had
 7 explicitly made that point also about the hot zone.
 8 However, again, being driven by those strategic aims,
 9 I would have hoped that that would make sense to the
 10 commanders and that they would understand that same
 11 principle.
 12 SIR JOHN SAUNDERS: The reason for not including it, is that
 13 because it was not contemplated when writing JOPs 3?
 14 A. No, I think it was possibly more about an assumption
 15 that that same principle, if it applies to the warm
 16 zone, it would most certainly apply to a hot zone
 17 because that is an even more dangerous environment. So
 18 if it's applicable to the warm zone then it must be
 19 applicable to the hot zone. That is probably —
 20 SIR JOHN SAUNDERS: The possible interpretation is you can
 21 do it in the warm zone, but the hot zone is even more
 22 dangerous, so you get them out and you make them go,
 23 because there's a really intense risk to their lives.
 24 A. And there is. Again, that's why for me it all comes
 25 back to that strategic intention around minimising the

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1 risk to the public.
 2 SIR JOHN SAUNDERS: Okay, thank you.
 3 I'm sorry to appear to sound critical, but we
 4 obviously need to look at it and possible different
 5 interpretations.
 6 MR GREANEY: We certainly need to look at whether there were
 7 any inadequacies in JOPs and the plans and then later to
 8 look, if there are, whether those have been remedied.
 9 Mr Thomas, that is all I'm going to ask you about the
 10 Joint Operating Principles edition 3.
 11 I'm going to turn to my second topic, to the
 12 national Operation Plato guidance for police officers.
 13 This appears in a number of locations on the Magnum
 14 database, but the version we'll use, Mr Lopez, is
 15 {INQ007211/1}.
 16 As we can see:
 17 "Operation Plato: initial response, contingency
 18 planning guidance for police forces."
 19 I hope you'll be able to confirm that this is the
 20 iteration that was in force at the time of the arena
 21 attack.
 22 A. Yes, that's correct.
 23 Q. Again, I'm not going to look through every single word
 24 of this or anything like, but just go to what seemed to
 25 me to be the key aspects in light of the evidence we've

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1 heard.
 2 Could we go, first of all, Mr Lopez, please, to
 3 {INQ007211/4}, paragraph 1.1.
 4 Just to be clear about something you've mentioned
 5 already, this document has been created by Counter
 6 Terrorism Policing Headquarters and is intended as
 7 police single service guidance.
 8 A. Yes.
 9 Q. So we've now, I won't say moved down, but we've moved
 10 through the hierarchy, JESIP, JOPs, and now we are at
 11 something which is specific for police forces?
 12 A. Yes.
 13 Q. But not for a police force, this is across all police
 14 forces?
 15 A. Yes, this is intended to inform the development of their
 16 local operational plans.
 17 Q. And then paragraph 2.1:
 18 "The primary purpose of this guidance is to assist
 19 forces in reviewing and developing their contingency
 20 plans for responding to an MTFA. It will also support
 21 a consistent and interoperable approach across forces."
 22 So does this take us back to the point you mentioned
 23 earlier that this guidance, as with JOPs, is not
 24 intended to be prescriptive?
 25 A. No.

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1 Q. But there are some basic principles that should be
2 applied?

3 A. Yes.

4 Q. And that obviously it is desirable that there should be
5 consistency across all forces?

6 A. Yes.

7 Q. Next, please, {INQ007211/5}. Paragraph 2.5. The very
8 point we've just been discussing:

9 "It [so this policy] recognises the fact that the
10 resourcing and structure of forces will differ; for this
11 reason the guidance is not prescriptive in relation to
12 how actions and considerations are completed."

13 A. Yes.

14 Q. So just to telegraph something we're going to be looking
15 at later on, as you appreciate, one of the issues that
16 has arisen during the course of the evidence in the
17 inquiry is who should have been responsible for and who
18 was responsible for unarmed assets at the scene of the
19 attack in the aftermath.

20 A. Yes.

21 Q. I believe one of the points you're going to be making
22 is that the guidance, this guidance, the JOPs, don't
23 tell forces how they are to resolve that situation, it's
24 for individual forces to put in place their own command
25 structures?

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1 A. Yes, on the basis of the guidance provided.

2 Q. But on the basis of the principles that have been set
3 out?

4 A. Yes.

5 Q. Next, please, {INQ007211/6}, paragraph 3.5.
6 "Forces should give consideration to having specific
7 Operation Plato response plans for any
8 significant /high-profile crowded places within their
9 policing area."
10 Why should forces give consideration to that?

11 A. On the basis of threat and risk, the suggestion here
12 is that -- I think I spoke to this during my previous
13 evidence -- forces should be conducting a threat and
14 risk assessment of the most likely areas that would be
15 the victim of a marauding terrorist firearms attack and
16 ensuring that they have appropriate plans in place.

17 Q. You referred to your evidence on the last occasion. As
18 you will appreciate, the question of whether the
19 Manchester Arena, a venue in the centre of a major city,
20 above a transport hub and regularly holding well over
21 10,000 people, would fit that description as requiring
22 a specific plan. That question was not one that you
23 thought it would be helpful for you to engage with
24 directly when you last gave evidence.

25 A. That's correct, sir.

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1 Q. I'm sure that remains your position. But you were
2 clear, and am I right you remain clear, that what you
3 would expect is each force to carry out a risk
4 assessment of venues in its area in order to identify
5 which locations fell into a category requiring
6 a specific plan?

7 A. Yes, that's correct.

8 Q. Next, {INQ007211/8}, please. Paragraph 3.14:
9 "It is important that forces recognise that less
10 sophisticated attacks may be the beginning of, or
11 precursor for, more complex attacks. In these
12 situations consideration needs to be given to delivering
13 a local response in keeping with the lower level of
14 sophistication and scale whilst considering an early
15 declaration of Operation Plato, which can always be
16 withdrawn if the scale and sophistication does not
17 escalate."

18 I just wanted to be clear about this. Is this an
19 encouragement to the FDO, in circumstances in which
20 there is doubt about whether an MTFA is underway, to
21 declare Operation Plato because it can always be
22 rescinded?

23 A. Yes.

24 SIR JOHN SAUNDERS: I just wonder whether sophisticated is
25 the opposite of complex. You can have a single device

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1 which might be described as sophisticated.

2 Salman Abedi's bomb might be described as sophisticated,
3 but that's not what you're meaning by sophisticated
4 there, is it? Because it's a single person acting on
5 their own, you regard it as being not a sophisticated
6 attack. Is that capable of misunderstanding? A single
7 operator could be quite sophisticated.

8 A. I take your point, sir, but I think within emergency
9 services circles this point about less
10 sophisticated/more complex attacks is well understood.
11 It's something that has been discussed with --

12 SIR JOHN SAUNDERS: So that would be understood,
13 sophisticated, by the people reading?

14 A. I think so, yes.

15 SIR JOHN SAUNDERS: Okay, fair enough.

16 MR GREANEY: Next, {INQ007211/9}, please, paragraph 4.7:
17 "If an Operation Plato is declared and it
18 subsequently becomes apparent that the incident is not
19 an MTFA, then the officer who is undertaking the role of
20 the TFC must redefine the incident immediately and
21 ensure that all relevant personnel and agencies are
22 informed. This would also require a full review of the
23 operation utilising the national decision model and may
24 lead to a revised strategy and overall response."
25 In this context, what does "redefine the incident"

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1 involve?
 2 A. Taking the view based on all the available information
 3 and intelligence and what within certainly police
 4 circles is known as "spinning the wheel", spinning the
 5 national decision model, which is what commanders should
 6 be continually doing. It's re-evaluating on that basis
 7 of current information and intelligence, assessment of
 8 that threat and risk as to what it is you have currently
 9 got and then telling people what it is you believe
 10 you are currently dealing with. So that constant
 11 reassessment of what is it that we've got and how should
 12 we effectively respond to it.
 13 Q. So on what you have said to us so far, the encouragement
 14 to the FDO is not to adopt an overly cautious approach
 15 to the declaration of Operation Plato?
 16 A. No.
 17 Q. But that once Operation Plato has been declared, from
 18 what you're saying it seems as if it's important that
 19 that declaration should be reviewed in light of
 20 information that is coming to the FDO and, as is said
 21 here, the TFC?
 22 A. Yes.
 23 Q. It may of course be the same person in the early stages
 24 of an event.
 25 A. Yes.

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1 Q. And that if the point is reached at which it's clear
 2 that Operation Plato is not appropriate, at that stage
 3 it should be rescinded or redefined, as it's put in the
 4 policy?
 5 A. Yes.
 6 SIR JOHN SAUNDERS: Mr Greaney, as you know, I have quite an
 7 interest in this particular point.
 8 MR GREANEY: Yes.
 9 SIR JOHN SAUNDERS: If you don't mind, I will just pursue
 10 it. It's bound to be in terms of 22 May.
 11 There seems to be two different schools of thought
 12 relating to what should have happened on 22 May. Armed
 13 police go in, there's been an explosion and they clear
 14 the area, and the arena is safe. What steps should then
 15 be taken? On the one hand, people seem to say you
 16 rescind Plato or you suspend it, whatever they like to
 17 call it, or the alternative view, which I have to say
 18 seems to me to be more likely to be correct at the
 19 moment, is that you say, "Right, the arena is now a cold
 20 zone, don't rescind Plato", because it seems to me that
 21 Plato is not, when you've got a terrorist attack, not
 22 just confined to the area where the bomb's gone off,
 23 that other attacks which have happened elsewhere can
 24 take place in different areas. So until you're clear
 25 that the whole area is clear — and by that I mean

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1 probably Manchester in this particular case or the city
 2 centre — you should leave Plato in place, but redefine
 3 the zones. Which is right?
 4 A. I would see it exactly as you've just described there,
 5 sir, that there may be a set of circumstances where the
 6 information and intelligence known to the commander
 7 means that they no longer believe they have a marauding
 8 terrorist firearms attack and so they made the decision
 9 to rescind Plato, or it may be, accepting that these
 10 situations will always be hugely complex and confusing
 11 in the early stages, may well be that a Plato
 12 declaration stands, but you make effective use of the
 13 zones in terms of directing activity within specific
 14 areas. That is the whole concept on which Plato and the
 15 JOPs are built. So I think you've hit the nail on the
 16 head, sir.
 17 SIR JOHN SAUNDERS: And we have to bear in mind as well,
 18 don't we, that there were at least warnings of other
 19 possible attackers in various parts of Manchester going
 20 on at the same time?
 21 A. Indeed. History tells us that that is highly likely,
 22 that you will be getting both genuine and well
 23 intentioned but mistaken reports of other activity, and
 24 again I come back to the weight of command and the
 25 burden of command that's on the shoulders of commanders

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1 during these incredibly challenging incidents.
 2 SIR JOHN SAUNDERS: Do you think that is made sufficiently
 3 clear in 4.7?
 4 A. I do, yes.
 5 MR GREANEY: Just to make sure I've understood the evidence,
 6 we're going to the facts of the 22nd, but obviously
 7 you're prepared to do so. You will be aware, as the
 8 chairman has indicated, that reports did come in of
 9 other potential events in other parts of
 10 Greater Manchester that night.
 11 A. Yes, and that's the experience from other similar
 12 incidents across the country and indeed across the
 13 globe.
 14 Q. We know there was a concerning report about events at
 15 Oldham Hospital.
 16 A. Yes.
 17 Q. We know that there was a report of, I think, a
 18 suspicious package at the cathedral. My understanding
 19 of what you are saying to us is that in circumstances in
 20 which you might be satisfied that there is no remaining
 21 threat at the arena but in which other reports are
 22 coming in, it may well be appropriate to maintain the
 23 Plato declaration?
 24 A. Yes.
 25 Q. But that if you're satisfied that the arena and the

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1 surrounding area is safe, the way you manage that is by
 2 designating it as cold?
 3 A. In terms of reviewing those zones, yes.
 4 Q. Which has the consequence, as we've discussed already,
 5 that all emergency service personnel are able to enter
 6 that area?
 7 A. Yes, and gives you that flexibility .
 8 Q. What I am proposing to do is to finish the exercise of
 9 going through the policy and then we'll take a break if
 10 that suits you.
 11 Could we go next, please, to {INQ007211/11}.
 12 There's a section here that we'll need to look at.
 13 Paragraph 5.18:
 14 "Plans should consider the use of action cards or
 15 drop-down lists within control rooms that are in keeping
 16 with the guidance within this document."
 17 Why did the policy consider that action cards or
 18 similar might be of assistance?
 19 A. Again, this comes back to the point that I made in my
 20 previous evidence that it was always well understood
 21 that the police control room, and specifically the
 22 initial tactical firearms commander, the FDO in GMP
 23 parlance, would come under significant demand. So one
 24 of the mitigations around that was ensuring that there
 25 were systems and processes in place to enable that load

1 to be shared across all members of the available team,
 2 so other people within the control room.
 3 So the action cards, if utilised correctly, will
 4 enable that so that all of the activity that needs to be
 5 undertaken under the direction of the initial TFC can
 6 actually be undertaken across that wider team, that
 7 sharing of the burden, and that's done in a coordinated
 8 manner so that everybody is clear about who's doing what
 9 and what is getting done.
 10 Q. And the policy, the March 2017 policy, goes on to
 11 explain that in further detail. 5.19:
 12 "Action lists may be in hard copy or on electronic
 13 command and control systems and should be designed in
 14 keeping with the resource picture and control room
 15 structures within each force. Forces should consider
 16 pre-allocating actions to specific roles."
 17 Again this is about ensuring that there has been
 18 a delegation of responsibilities ?
 19 A. Yes.
 20 Q. Not on the night of an attack but well ahead of time?
 21 A. Yes.
 22 Q. Paragraph 5.20:
 23 "Irrespective of which process is utilised, the
 24 action list and any other relevant aide-memoires or
 25 plans should be readily accessible and immediately

1 available to all relevant staff."
 2 A. Yes.
 3 Q. 5.21:
 4 "It is essential that all staff tasked with
 5 completing actions have a full understanding of the
 6 required task and also situational awareness of the
 7 unfolding incident. This is particularly important when
 8 staff are dynamically informing and briefing other
 9 agencies and partners. Appropriate training and regular
 10 exercising will support the required level of
 11 understanding by all relevant staff."
 12 A. Yes.
 13 Q. So this seems to indicate that two things are important.
 14 (1), that action cards should exist?
 15 A. Yes.
 16 Q. And (2), that they should be embedded by a proper system
 17 of training and instruction?
 18 A. Yes.
 19 Q. I think for my purposes, finally, we can go to
 20 {INQ007211/24}. There's an important section to which
 21 you've made reference already. Paragraph 12.7, please.
 22 If you enlarge the bottom half of the page.
 23 This is the section of the policy that is dealing
 24 with the initial police strategy and the strategic aims
 25 of that strategy. It provides:

1 "In order to achieve the overarching strategic aim,
 2 a suggested initial police strategy may include:
 3 minimise the risk to the public; maximise the safety of
 4 police, ambulance and FRS responders; follow the
 5 principles of joint working, sharing of information and
 6 the joint assessment of risk to inform decision-making
 7 within the multi-agency response."
 8 And then over the page {INQ007211/25}:
 9 "Where possible support the evacuation and treatment
 10 of casualties. Where possible, arrest offenders in
 11 order to bring them to justice and support the judicial
 12 system. Secure and preserve evidence to support
 13 quick-time forensic opportunities and support
 14 post-incident investigations, criminal proceedings and
 15 inquiries. Assist in the return to normality and
 16 reassurance of the public."
 17 We are going to come back to this particular
 18 paragraph, but the first in that list is "minimise the
 19 risk to the public", and should we read importance into
 20 the fact that that is the first in the list ?
 21 A. Yes. That's for a very good reason: this is
 22 a hierarchical strategy and so the number one aim is to
 23 minimise the risk to the public.
 24 SIR JOHN SAUNDERS: It also goes all the way down hierarchy?
 25 A. Yes.

1 MR GREANEY: Should we understand that minimising the risk
2 to the public should always be the number one priority
3 in an MTFA response?
4 A. Yes.
5 Q. So is there any difficulty with the fact that the policy
6 set out there is a suggested as opposed to mandatory
7 initial police strategy?
8 A. Again it comes back to the same point that this is
9 guidance, a set of principles that should inform
10 commanders, but it's important that the commanders have
11 that dynamic flexibility to do what appears to them to
12 be right in line with the JDM or the NDM. But I think
13 it's widely accepted across the emergency services, and
14 certainly within policing, that our intent will always
15 be to minimise the risk to the public and, certainly
16 within operational command, that our activity will
17 always be driven by the strategy.
18 Q. So maximising the safety of police officers and your
19 emergency service partners obviously is an important
20 consideration, but the number one priority is always
21 minimising the risk to the public?
22 A. Yes.
23 Q. Which means saving lives?
24 A. Yes.
25 Q. That's the final passage, certainly at this stage,

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1 I want to ask you about in relation to the policy, but
2 there is just one topic I'll ask you to deal with before
3 we break.
4 Is it the position that in May of 2017,
5 CTP Headquarters would have expected all operational
6 supervisors to have been aware of Operation Plato?
7 A. Yes.
8 Q. Is it also the position that there was nothing about the
9 security marking of JOPs 3 or the refreshed guidance to
10 prevent all such people being aware of Operation Plato?
11 A. No, both documents are graded as official sensitive.
12 The emergency services routinely operate at official.
13 So virtually all of our documentation, certainly in
14 policing, is by default official. A subset of that is
15 official sensitive. Because these two documents are
16 in relation to responding to terrorist attacks, that's
17 why they were in that sub-category, if you like, of
18 official sensitive. But certainly within policing that
19 I can speak for, all of our systems are able to
20 routinely carry official sensitive information and there
21 is no reason whatsoever to prevent the sharing of
22 official sensitive information with those individuals
23 within policing, across policing, that need to
24 understand it. Indeed, certainly the Plato guidance
25 proactively encouraged forces to do that very thing and

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1 to ensure that everybody that would need to know about
2 Plato understood about Plato.
3 Q. So the upshot of that helpful answer is that the
4 expectation was, as of May 2017, that all police
5 officers and staff who might perform a role in the event
6 of an MTFA response would have been aware of
7 Operation Plato and the guidance?
8 A. Yes.
9 Q. And would have been trained in it?
10 A. At the very minimum briefed on it and aware of its
11 understanding.
12 Q. Would it be fair to say that had CTP Headquarters been
13 aware that someone performing a Silver command role in
14 the event of a Plato incident was unaware even of what
15 Operation Plato was, that would have been a concern?
16 A. Yes.
17 Q. And not at all acceptable?
18 A. No.
19 SIR JOHN SAUNDERS: Can I just go to {INQ007211/24}? Were
20 you about to suggest a break? Oh, sorry,
21 {INQ007211/25}.
22 Now go back, please, to the page before again.
23 {INQ007211/24}.
24 Right. This may well be a pedantic lawyer's point,
25 but I wonder whether the third in those bullet pointed

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1 list is actually appropriate there. Because actually,
2 that is a way of achieving — sorry, the overarching
3 strategic aim is to minimise the risk to the public and
4 maximise the safety. They are the aims, that's to be
5 the strategy.
6 The tactic for doing that is the third one:
7 following the principles of joint working. So it
8 doesn't seem to me necessarily to fit in the hierarchy
9 correctly, because one is the way of achieving the
10 other, it is like a strategic commander and a tactical
11 commander. Just have a think about that. As I say, it
12 may be just be a pedantic lawyer's point.
13 A. It's not something that automatically occurs to me, sir,
14 but yes, I will certainly look at that.
15 MR GREANEY: Sir, could we have a break?
16 SIR JOHN SAUNDERS: Yes. A quarter of an hour, thank you.
17 (11.01 am)
18 (A short break)
19 (11.21 am)
20 MR GREANEY: Mr Thomas, topic 3: zoning in more detail.
21 This takes us to your third witness statement, which is
22 one of two dated 1 July of this year, and page 3.
23 You've plainly, if I may say so, taken care in how
24 you've expressed yourself in that statement, so I'm just
25 going to take you through that document.

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1 A. Thank you.
 2 Q. You've told us already that there needs to be a joint
 3 assessment of risk. I'm at paragraph 10. First of all,
 4 who should be involved in that joint assessment and,
 5 secondly, who, if anyone, should lead it?
 6 A. Representatives at command level of all three services
 7 should be involved in that and it should be led by the
 8 police.
 9 Q. By what should the assessment be informed?
 10 A. All of the available information and intelligence and an
 11 assessment of that threat and risk.
 12 Q. As you've explained already, would you expect the
 13 overarching strategic aim in the course of that
 14 assessment always to be minimising the risk to the
 15 public, in other words saving life?
 16 A. Yes.
 17 Q. Is it out of that assessment that the designation of
 18 zones would be expected to emerge?
 19 A. The initial designation, yes, from that initial
 20 assessment of the risk.
 21 Q. This is just what I wanted to understand at the outset.
 22 What is expected to happen in the event of an
 23 Operation Plato situation is plainly that all emergency
 24 partners are informed and that there should occur, one
 25 would have thought at the FCP, a meeting between the

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1 respective commanders?
 2 A. Yes.
 3 Q. And that at that meeting they should make their joint
 4 assessment of risk and therefore make their decisions in
 5 light of that assessment?
 6 A. Yes, with the caveat, as I think I mentioned earlier,
 7 that it may well be that an initial assessment has
 8 already taken place prior to the commanders being
 9 co-located at the FCP, certainly involving, from
 10 a police perspective, the initial tactical firearms
 11 commander in the control room.
 12 Q. This was exactly the point I was coming to, because
 13 plainly it's going to take some time for that initial
 14 JESIP huddle to be arranged.
 15 A. Yes.
 16 Q. And if the designation of zones only occurs for the
 17 first time out of that huddle, that doesn't sound ideal.
 18 A. No.
 19 Q. So at what stage does JESIP, the JOPs and the refreshed
 20 guidance anticipate the designation of zones will be
 21 made and by whom?
 22 A. So at the earliest opportunity and highly likely that
 23 that will be by the initial tactical firearms commander,
 24 so the initial tactical commander based within the
 25 police control room.

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1 Q. So the FDO, in other words --
 2 A. Yes.
 3 Q. -- on our facts? And necessarily, given that he is
 4 going to be in the control room, he won't be on scene?
 5 A. No.
 6 Q. So how is he to decide which locations fall into which
 7 designations?
 8 A. So by trying to assimilate and draw together all of the
 9 available information and intelligence, accepting that
 10 much of that will probably be coming from the public
 11 through the calls into the emergency services, other
 12 sources of information there may be, such as CCTV that's
 13 available within the control room, so the myriad of
 14 opportunities to draw in information and intelligence,
 15 both within the control room, but also what can be seen
 16 and fed back from the scene. So it's the amalgamation
 17 of what the initial tactical firearms commander can
 18 gather from the control room, but also what is being fed
 19 back from various sources at the scene. All of that
 20 coming together to allow that initial tactical firearms
 21 commander to make the best decision that they can from
 22 their perspective about what's going on and how they
 23 should approach the response.
 24 Q. So we have a number of phases. We've now identified the
 25 first two. Phase 1 is the FDO in his role as ITFC

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1 making a decision about zoning based upon what he knows.
 2 A. Essentially, yes.
 3 Q. Phase 2 is the JESIP huddle at which the commanders get
 4 together and they either ratify those designations or
 5 they change those designations?
 6 A. Yes, it may well be.
 7 Q. At each of those phases, I'm now at paragraph 11 of your
 8 statement, would you expect minimising the risk to the
 9 public to be the focus of that decision-making?
 10 A. I would, yes.
 11 Q. Whilst also, of course, taking mitigating action to
 12 maximise the safety of the responders?
 13 A. Yes.
 14 Q. At paragraph 12, the way in which you put it is:
 15 "The use of zones is one of the principles contained
 16 within the guidance designed to enable commanders to
 17 take dynamic decisions rather than being hamstrung by
 18 a prescriptive and formulaic approach."
 19 In fact, I read that out earlier, didn't I?
 20 "The application of zones enables commanders to
 21 proactively deploy responders to a scene in order to
 22 minimise the risk to the public whilst providing a basic
 23 structure which supports them in maximising the safety
 24 of those responders."
 25 A. Yes.

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1 Q. And are you able to explain what you mean in that
2 paragraph?

3 A. So as I've already said, the response should be driven
4 by the strategy. We've already discussed that
5 minimising the risk to the public will be at the top,
6 followed very closely by maximising the safety of the
7 responders, and so the zones are seen as one of those
8 enablers to assist the commanders in achieving/striking
9 that balance. So it's giving you a tool that everybody
10 should understand that will allow you to focus in on
11 those two objectives.

12 Q. When you say a tool that everyone should understand,
13 do you mean that everyone should understand the tool
14 exists or do you mean that everyone should understand
15 what the outcome is of the application of that tool?

16 A. Both. They should understand that the tool exists and
17 they should understand how they're going to use that
18 tool to effectively deploy resources, to minimise the
19 risk to the public and to maximise the safety of the
20 responders in doing so.

21 Q. In fact, my rather clumsy question was focused on
22 a different issue, so let me put it more directly. On
23 the face of it, it's important that all emergency
24 responders should know about the designation of zones
25 because that will be relevant to where people can or

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1 cannot go.

2 A. Yes.

3 Q. So when the FDO has declared Plato, communicated that,
4 and then made his decisions at that stage about
5 designation, would you expect his decision about where
6 falls into which zones to be communicated to emergency
7 service partners?

8 A. Yes, absolutely.

9 Q. And at that next stage, when the decision is being
10 considered in the JESIP hub, once their designation
11 decisions have been made, again would you expect that to
12 be communicated to other emergency service partners?

13 A. Yes, because it's driving that deployment. People need
14 to understand it to be effectively deployed in line with
15 it.

16 Q. Earlier when we were considering the declaration of
17 Plato, we considered the role or otherwise of caution.
18 When a decision is being made about the designation of
19 a hot zone, either by the FDO or by the commanders,
20 would you expect a cautious approach to be taken, by
21 which I mean having the hot zone as big as you think
22 might possibly be necessary, or some different approach?

23 SIR JOHN SAUNDERS: Can we split them? Because it may be
24 a different answer.
25 The FDO, would you expect a cautious approach?

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1 A. I'm not sure if cautious is the word that I would use.
2 I would expect them to apply the zones based on all of
3 that available information and intelligence to them at
4 that time. So what it is that they believe they've got
5 at that time.

6 SIR JOHN SAUNDERS: Then the huddle, the same applies, but
7 of course you'd expect them to have more detailed
8 information by then?

9 A. More situational awareness, yes.

10 SIR JOHN SAUNDERS: Situational awareness, yes.

11 A. Because the information and intelligence is developing
12 all the time.

13 SIR JOHN SAUNDERS: That's why I'm suggesting it might be
14 a different answer.

15 MR GREANEY: At paragraph 13 of your statement, you say:
16 "Commanders would be expected to limit the hot zone
17 to the specific area where they believe, based upon all
18 available information and intelligence, attackers armed
19 with firearms are continuing to present an immediate
20 threat to life."

21 A. Yes.

22 Q. So have I correctly understood that the hot zone should
23 be no larger than is necessary to achieve that end,
24 namely confront and neutralise the armed terrorist?

25 A. Yes, because according to the definition of the hot

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1 zone, that is where we believe those attackers are and
2 are presenting a continuing threat to life. So the
3 purpose of deployment into that hot zone by armed
4 officers is to neutralise that threat or, if they're not
5 able to immediately neutralise it, to at least shrink
6 that area down by constraining the movement of the
7 attackers or terrorists.

8 Q. So this is what I was trying to get at earlier. A hot
9 zone is designated and we have armed officers in there,
10 whose purpose is to neutralise the threat. If they are
11 able to achieve that very quickly indeed, obviously that
12 will remove the need for the cold zone or at least
13 shrink it very substantially?

14 A. The hot zone.

15 Q. The hot zone, forgive me, yes. If they can't neutralise
16 it completely, the hope and expectation would be that
17 they would take steps that would shrink the size of the
18 hot zone?

19 A. Yes.

20 Q. So is there an expectation therefore that information
21 about what is happening on the ground in the hot zone is
22 regularly, if not continually, being passed back to the
23 commanders who are making the designation decisions?

24 A. Yes, absolutely, that continual flow of information,
25 both upwards and downwards through the command chain.

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1 Q. You go on to say:
 2 "In the event that the attackers are all
 3 neutralised, this will negate any ongoing requirement
 4 for a hot zone. However, where the armed officers are
 5 only able to initially restrict the attackers' movement,
 6 this should still result in the size of the hot zone
 7 being reduced."
 8 A. Yes.
 9 Q. Again, this is the idea that at all stages, the hot zone
 10 should be no bigger than is necessary to achieve the aim
 11 of neutralising the terrorists?
 12 A. Yes.
 13 Q. "The deployment [you add] of unarmed resources without
 14 the ability to neutralise the threat posed by the
 15 attackers into this zone where they are actively
 16 presenting an armed threat would be highly likely to
 17 increase the number of victims without providing any
 18 benefit in terms of minimising the risk to the public."
 19 So you're still dealing with a hot zone there and
 20 what do you mean by that?
 21 A. So all of the activity within the hot zone is focused on
 22 neutralising that ongoing threat from the attackers.
 23 This guidance is designed for a marauding terrorist
 24 firearms attack and therefore the deployment of unarmed
 25 officers or other responders who have no means of

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1 neutralising that threat isn't going to assist in or is
 2 unlikely to assist in achieving that aim. And all that
 3 you are likely to do by putting unarmed officers into
 4 harm's way within that hot zone is create further
 5 victims because you are asking those unarmed officers,
 6 without the ability to neutralise the threat they are
 7 going to face, to deploy into that area. It is highly
 8 likely that is just going to result in those officers
 9 also becoming injured or killed and so becoming
 10 additional victims for us to deal with.
 11 Q. So the hot zone, as we know, is the area where the
 12 attackers are present and/or there is an immediate
 13 threat to life --
 14 A. Yes.
 15 Q. -- from an armed attacker?
 16 A. Yes.
 17 Q. So it's likely, if I've understood it correctly, to be
 18 the area in which fighting is actually taking place
 19 between the police and the terrorist?
 20 A. That's how it's anticipated, yes.
 21 Q. That's the hot zone?
 22 A. Yes.
 23 Q. If a point is reached at which there is no armed
 24 attacker within a particular area and where the police,
 25 by which I mean armed police, have control of the area,

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1 so they have armed officers within the area covering all
 2 points of potential entry by armed terrorists, does it
 3 follow that that area cannot be a hot zone in accordance
 4 with JOPs 3 and the refreshed guidance?
 5 A. In line with the guidance, yes.
 6 Q. Does it follow, moreover, if the police have control of
 7 that scene, in circumstances in which there might be an
 8 IED somewhere but there is no obvious sign of one, that
 9 that area is also not a warm zone?
 10 A. So if there is control of the area -- so to go back to
 11 the definitions of the zones, so if the attackers are
 12 believed to have passed through that area but they can't
 13 re-enter by whatever control measures have been put in
 14 place, and you've secured that area, then by definition
 15 I would suggest that that then becomes a cold zone
 16 because, by the control measures you've placed around
 17 that area, you are making that area safe, you're
 18 preventing the attackers coming back in there, and you
 19 don't believe the attackers are already within it, so
 20 you are therefore creating a safe environment to deploy
 21 your responders.
 22 Q. Sir, I know that this is an area that you've been
 23 particularly interested in. That was the issue that
 24 I was particularly concerned to explore. I don't know
 25 if there are any further questions you wish to ask.

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1 SIR JOHN SAUNDERS: I'm not going to go into it detail, but
 2 it raises the same issue as we raised with others, the
 3 rendezvous point, it depends on agreement and that
 4 happening, and you would expect -- you're relying on
 5 that agreement happening between sensible people who are
 6 acting and there's no one who's going to overrule them
 7 and say, "That's it, you may not agree but that's it".
 8 And you just don't see any way out of that at the
 9 moment?
 10 A. I think in terms of the application of the zones and the
 11 designation of the zones, I think what would happen is
 12 bearing in mind that this is a police-led operation,
 13 that if the police commander defined the zones but the
 14 other commanders didn't necessarily agree with that
 15 definition, the defining of the zones by the police
 16 commander would still stand. What you would be then
 17 into is that debate about whether the other commanders
 18 would be prepared to deploy their resources into those
 19 zones. I think that's a subtly different point from the
 20 one about the rendezvous point.
 21 SIR JOHN SAUNDERS: Where do I find that in JOPs 3?
 22 A. I think that's where the JOPs talk about that being led
 23 by the police.
 24 SIR JOHN SAUNDERS: Sorry, I should have found it for you
 25 beforehand so I could give you the reference.

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1 A. Just bear with me.
 2 MR GREANEY: Maybe 4.3. {INQ008372/10}, please.
 3 The second paragraph:
 4 "During the course of an attack, certain situations
 5 may require that either the Fire and Rescue Service or
 6 Ambulance Service take a lead role in certain aspects of
 7 the incident response, such as firefighting or casualty
 8 treatment. The police will retain overall
 9 responsibility for coordinating the multi-agency MTFA
 10 response."
 11 A. Certainly, sir, the section I'd gone to was 4.10, where
 12 it says that:
 13 "The police on-scene commander will lead the joint
 14 assessment of the risk FCP or RVP with ambulance and FRS
 15 counterparts to determine when and where to deploy
 16 emergency service responders."
 17 SIR JOHN SAUNDERS: Right. I'm not going to go into this in
 18 detail because I think I understand your response, what
 19 it will be. Clearly, there is a problem when we have
 20 heard from the police that they would, in their
 21 assessment of risk, disregard the question of there
 22 being other unexploded devices in the area because, as
 23 we know, getting a dog there, which is the way of
 24 actually finding that out, can take a long time. But on
 25 the other hand, the Ambulance Service very much take it

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1 into account. So if they're actually using different
 2 criteria for their zones, that seems to me to be a
 3 possible — leading to confusion and disagreement.
 4 A. So the tri-service guidance is the JOPs that's been
 5 agreed by all three emergency services. If there is
 6 then a difference in the single service supporting
 7 guidance that we haven't already picked up and
 8 addressed, which we may have, and I think that might be
 9 looked at later, then you're right, that is something
 10 that should be explored if that remains as a residual
 11 issue.
 12 SIR JOHN SAUNDERS: Okay. The other thing is what seems
 13 apparent in the evidence is a confusion between zoning
 14 in Operation Plato and zoning in major incidents.
 15 Of course, the added confusion is that some people
 16 thought they were dealing with Plato and other people
 17 thought they were dealing with a major incident and
 18 didn't know about Plato being declared.
 19 A. To my knowledge, there shouldn't be a use of zones
 20 during a major incident. Zones are applicable to
 21 a marauding terrorist firearms attack.
 22 SIR JOHN SAUNDERS: Okay. We'll check that. I certainly
 23 thought there were indications in a major incident you
 24 would have zoning.
 25 MR GREANEY: The Ambulance Service used — we will check it,

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1 but my recollection is they used zoning. They used some
 2 of the same language, but to describe different things.
 3 SIR JOHN SAUNDERS: Yes. Okay.
 4 A. From a police perspective, I'll stand to be corrected,
 5 I don't think that we do talk about the use of zones
 6 during a major incident.
 7 During the response to an explosive threat, as
 8 I alluded to earlier, we will talk about cordon
 9 distances, but we wouldn't use zone terminology.
 10 SIR JOHN SAUNDERS: Okay. It may be that someone needs to
 11 look at it, maybe I've misunderstood it. Confusion
 12 should be avoided if at all possible. Thank you very
 13 much for those answers.
 14 MR GREANEY: Just to finish off this point before we move to
 15 topic 4, Mr Thomas, you are quite right to draw our
 16 attention to 4.10, that:
 17 "The police on-scene commander will lead a joint
 18 assessment of risk at the FCP or RVP with ambulance and
 19 the Fire and Rescue Service counterparts to determine
 20 when and where to deploy emergency service responders."
 21 But I'm sure taking into consideration all of that
 22 information, I am sure you'll agree that we also need to
 23 note that it continues:
 24 "Whilst this process will be led by the police, each
 25 emergency service will be responsible for deploying its

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1 respective resources."
 2 A. Yes, the point that I tried to make earlier, yes.
 3 Q. So to some extent we are at risk at being in the same
 4 situation of the RVP, that the police will lead the
 5 discussion, but ultimately if there is a disagreement
 6 about whether paramedics or Fire and Rescue Service
 7 personnel should go into a particular area, the police
 8 do not hold the trump card?
 9 A. No, as I said to the chair earlier, that would be my
 10 understanding of how that would be likely to play out.
 11 If there was disagreement about the zones, then on the
 12 basis that this is a police-led operation, I think the
 13 police commander would define the zones and then
 14 it would be that determination by the other service
 15 commanders about whether they were content to deploy
 16 their staff. I think there are two slightly different
 17 issues within the one situation, if that makes sense.
 18 Q. It does.
 19 SIR JOHN SAUNDERS: Hopefully 22 May was entirely unique,
 20 but it appears that everybody disagreed about zoning.
 21 You don't need to comment on that.
 22 A. No, sir.
 23 MR GREANEY: Although it is a fact that different people had
 24 different views at the same time about that issue.
 25 Let's move on then to the fourth topic, which as

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1 I indicated I have described as the Nawaz/Dexter issue.
 2 By that, Mr Thomas, I mean the connected issues that
 3 have arisen on the evidence about whether Night Silver
 4 should have gone to the scene and whether the
 5 ground—assigned tactical firearms commander should have
 6 had command of not only armed but unarmed assets and, if
 7 so, which.

8 I'm not going to seek to draw you into that debate
 9 save to the extent that you can help us with some
 10 general principles. Again, you've addressed this in
 11 your third witness statement at paragraphs 33 to 48, so
 12 this is page 8 and following. Bearing in mind what the
 13 chairman said at the end of Mr Dexter's evidence, I am
 14 going to try and keep this as simple as possible.

15 First, in relation to this broad issue about
 16 on—scene commander, do you agree that Joint Operating
 17 Principles edition 3 did not seek to dictate to police
 18 forces the precise manner in which they should ensure
 19 effective armed and unarmed command during a Plato
 20 incident?

21 A. No.

22 Q. But instead it was for the individual forces to decide
 23 to achieve that?

24 A. Yes.

25 Q. But plainly, do you agree they needed, each force, to

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1 have plans and structures in place to enable that to be
 2 achieved?

3 A. Yes.

4 Q. And do you agree also that to have a situation in which
 5 the ground—assigned tactical firearms commander believed
 6 that he was in command of one thing whereas the
 7 strategic commander, Gold, believed him to be in command
 8 of another is a situation that is liable to cause real
 9 problems?

10 A. Yes, indeed. And as I think I said earlier, it's
 11 important to understand the JOPs from a police
 12 perspective and the Plato guidance can't be seen in
 13 isolation. So they need to be seen together with the
 14 other relevant guidance that informs police command
 15 during operations. So for the purpose of this I think
 16 we're talking about authorised professional practice, or
 17 APP, as it relates to both specifically armed policing,
 18 but then also generic operations, and both of those
 19 pieces of guidance do speak in some detail about how
 20 command structures should be established and employed.

21 SIR JOHN SAUNDERS: Why is it something that you can't give
 22 advice about?

23 A. I think we do give advice, sir. What we don't do is
 24 be — and I apologise for making repeated use of the
 25 word, but prescriptive. As I said earlier, certainly in

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1 my extensive policing experience, every incident and
 2 operation will be subtly different and so you can't have
 3 one definitive structure that will always be the most
 4 appropriate.

5 SIR JOHN SAUNDERS: I understand each incident has to be
 6 considered on its own merits and therefore there's
 7 a discretion to deal with it, but we're talking here
 8 about setting out a general rule.

9 A. Yes.

10 SIR JOHN SAUNDERS: Why can't you at least set out a general
 11 rule? You have the experience of going over all police
 12 forces in the country, or is it that police forces don't
 13 like being prescribed to?

14 A. So I think we do set out the general rule, sir. I think
 15 that's the exact purpose of the pieces of guidance that
 16 I've just outlined. But at the end of the day, all
 17 police forces are structured slightly differently. As
 18 I've said repeatedly this morning, every incident will
 19 be different and so the guidance is there, and I would
 20 assert is clear, but it is providing those general
 21 principles, that general guidance, that commanders can
 22 then utilise to effectively define the command structure
 23 that is required for the events that they are dealing
 24 with on that occasion. And I would suggest, sir, that
 25 that's a well accepted concept and principle within

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1 policing.

2 SIR JOHN SAUNDERS: Okay. So what is the guidance as to
 3 whether armed assets and unarmed assets should be
 4 commanded by the same person in marauding terrorist
 5 attacks?

6 A. I think I touched on this the last time I gave evidence,
 7 sir. I don't think it's particularly helpful to define
 8 the span of command in terms of whether assets are armed
 9 or unarmed.

10 MR GREANEY: I'm just going to interrupt for one moment,
 11 sir, and suggest that we look at what the witness said
 12 on the last occasion about this topic and try to draw
 13 the strands together.

14 SIR JOHN SAUNDERS: That's absolutely fine and I'm sorry
 15 I don't have it instantly to mind.

16 MR GREANEY: And then the witness can answer your question
 17 about what the guidance is in light of what he said on
 18 the previous occasion.

19 This is Day 60 of the oral evidence hearings. We're
 20 going to look first of all at questions posed by
 21 Mr Horwell on behalf of Greater Manchester Police.

22 Mr Lopez, could you take us, please, to page 104?

23 Mr Horwell had taken you to the definition of
 24 on—scene commander in JOPs 3 that we looked at this
 25 morning and then at the bottom of that page, line 24,

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1 Mr Horwell said {Day60/104:24}:
 2 "Question: So Mr Thomas, it's clear, I would
 3 suggest, that the terms police on—scene commander and
 4 ground—assigned TFC are interchangeable, do you agree?"
 5 You replied:
 6 "Answer: Yes, the on—scene commander language is
 7 appropriate for all three agencies [that was a reference
 8 to the fact that JOPs 3 of course caters for all three]
 9 so that's why it's the terminology that is utilised
 10 within JOPs edition 3. When we come to the specific
 11 police single service guidance that underpins that, we
 12 recognise that in police language that on—scene
 13 commander may be referred to as the ground—assigned TFC,
 14 but they will be discharging the responsibilities of the
 15 on—scene commander as per JOPs edition 3."
 16 "Question: I hope I can accurately summarise the
 17 position in this way: two different titles but the same
 18 role?
 19 "Answer: Yes, to reflect the nature — the
 20 differing nature of the two documents.
 21 "Question: Mr Thomas, can we agree on this, that
 22 there can only be one police on—scene commander; do you
 23 agree?
 24 "Answer: Responsible for that activity on the scene
 25 in conjunction with the two other emergency service

1 partners, yes, sir."
 2 Then if we can go to 107 {Day60/107:7}. Mr Horwell
 3 set out the concepts of inner and outer cordon — you'll
 4 remember this, Mr Thomas, I know. Line 7:
 5 "Question: My next question is this: in respect of
 6 the inner scene, the police on—scene commander will be
 7 in command of all police assets, armed and unarmed
 8 police officers; do you agree?
 9 "Answer: All of those engaged in activity within
 10 their span of command, yes, that's correct, sir."
 11 I'm going to come on in a short time to ask you
 12 about the way in which you qualified that answer by that
 13 term "span of command":
 14 "Question: And that would include [asked
 15 Mr Horwell] unarmed and armed police officers?
 16 "Answer: It may well do, depending on which assets
 17 are being deployed to undertake which activity. If it
 18 helps, the way that I always explain this is that the
 19 on—scene commander is responsible for all of that
 20 forward—facing threat mitigation and life—saving
 21 activity. That's where their focus in my opinion should
 22 be focused and there should be a supporting
 23 infrastructure around them that enables them to do
 24 that."
 25 And Mr Horwell then thanked you for your help.

1 Then a little later, the chairman returned to this
 2 topic, in fact at the end of Mr Horwell's questions.
 3 Could we go to page 110, please.
 4 At line 13 {Day60/110:13} we see Sir John saying:
 5 "SIR JOHN SAUNDERS: Because we may hear
 6 other evidence about this at a later stage, the
 7 question of which police officer takes control
 8 at the scene and of what assets. If you have a
 9 situation when there are a very large number of
 10 firearms officers on the scene and you have a
 11 very large number of non—firearms officers,
 12 I hesitate to call them ordinary police
 13 officers, but non—firearms, does it actually
 14 work to have the same person in charge of both
 15 groups of people as a matter of practice?"
 16 And you answered:
 17 "Answer: The command structure should be such that
 18 it can flex according to the nature and scale of the
 19 operation and it is normal practice that in very large
 20 operations the command structure will be reviewed and it
 21 may well be that additional commanders are appointed,
 22 even according to geographical areas — I'll not use the
 23 term zones for the fear of conflating two issues, but
 24 for geographical areas or for function. And again how
 25 that division is determined will be on the basis of the

1 prevailing circumstances at the time. It may well be
 2 that a decision is taken to appoint one person to be
 3 responsible for the firearms officers and somebody else
 4 to be responsible for the unarmed officers in certain
 5 situations, or it may well be that one person is
 6 appointed to take command of both of those officers
 7 within one area of operations and somebody else for both
 8 of those groups of officers within other geographical
 9 areas of responsibility. But that should be determined
 10 on the given events prevailing at the time."
 11 And you were asked by the chair:
 12 "SIR JOHN SAUNDERS: Who makes that
 13 decision, ie we need two commanders for unarmed
 14 and armed or it could be done by the one?"
 15 And you answered:
 16 "Answer: The strategic commander is responsible for
 17 ensuring that the command structure is appropriate and
 18 resilient.
 19 "SIR JOHN SAUNDERS: Is that Silver or Gold or is it
 20 the tactical firearms officer?
 21 "Answer: The strategic commander is either the
 22 strategic firearms officer or the Gold depending on the
 23 nature of the operation and the terminology that's being
 24 used.
 25 "SIR JOHN SAUNDERS: Is it necessary to make

1 clear to the ground commander whether in his
 2 function on this particular occasion he is
 3 commanding both or only one or would it be
 4 assumed he did both unless someone told him to
 5 the contrary.”
 6 Your reply, possibly an important one, was:
 7 “Answer: No, there would be no assumption. There
 8 should be absolute clarity within that command structure
 9 and amongst the officers deployed under that command
 10 structure as to which commanders own what and when and
 11 who is supporting to who. There is an absolute need for
 12 clarity in that regard.”

13 And Mr Horwell was asked by the chair if he had any
 14 questions arising out of that sequence and he did not.

15 What I'm going to seek to do is draw together the
 16 strands of those two passages in your evidence to see
 17 whether I have understood correctly — I know you will
 18 tell me if I haven't.

19 First, is it the position in accordance with JOPs 3
 20 and the refreshed guidance, we'll get to the question of
 21 whether it ought to be different in a moment, but as
 22 matters stood in May of 2017 was it the position in
 23 general terms that the police on-scene commander might
 24 be in command of both armed and unarmed assets,
 25 depending on the span of their command?

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1 A. Yes.
 2 Q. Does that mean depending on the activity in which the
 3 commander is engaged at that point in time?
 4 A. Yes. So again — I think I talked about this last time
 5 I was here, that in my view the on-scene commander, the
 6 police on-scene commander, is responsible for working
 7 with the partners for what I always describe as that
 8 forward-facing activity of neutralising threat and
 9 saving life. That's what the JOPs are there for: it's
 10 about getting in there, neutralising the threat, and
 11 then that activity to save life. So that is the purpose
 12 of that police on-scene commander and that's where their
 13 focus should be.
 14 Q. I didn't want to interrupt you because this is important
 15 but I was going to ask you to agree that that means,
 16 depending on what part of that they are dealing with at
 17 that moment, that may mean that they are commanding both
 18 armed and unarmed assets?
 19 A. Yes. That's just where I was going with it, sir. That
 20 may well result — and this may change over time. As
 21 more and differing assets become available then it may
 22 alter in terms of which assets are deployed in that
 23 activity. But it is completely feasible that that
 24 police on-scene commander may at various stages have
 25 a combination of both armed and unarmed resources

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1 working within their span of command.
 2 Q. So it may be the position that the on-scene commander
 3 commands armed and unarmed. It may be the position that
 4 there is a commander for one, armed, and a separate
 5 commander for the other, unarmed?
 6 A. Yes, although, again, I'm sorry to possibly appear
 7 pedantic, but the way that I always explain this is
 8 around the activity rather than the capability of the
 9 asset. So in my mind it's not about whether they are
 10 armed or unarmed police officers, it's just about what
 11 activity is that commander focused on and what assets
 12 are they using. As I've said earlier, it may be that
 13 they are just armed officers, it could even possibly be
 14 that they're just unarmed officers, or it's
 15 a combination of the two.
 16 Q. So let's imagine that the on-scene commander is directly
 17 concerned at a particular moment with neutralising the
 18 threat in the hot zone.
 19 A. Yes.
 20 Q. And as you've drawn to our attention, that was described
 21 at the London Bridge Inquest?
 22 A. Yes.
 23 Q. In that situation, one would expect that there would be
 24 armed officers actually engaged in fighting?
 25 A. Yes.

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1 Q. But one might also, for example, have unarmed officers
 2 in the warm zone performing a function such as keeping
 3 people away from the hot zone?
 4 A. Yes.
 5 Q. In that situation, the on-scene commander would
 6 therefore be commanding both armed and unarmed assets?
 7 A. Yes.
 8 Q. Because that is a necessary part of the function they
 9 are performing at that time?
 10 A. Yes.
 11 Q. But at other times, even during the course of the same
 12 incident, I think you are saying to us, the on-scene
 13 commander might be commanding only armed or might be
 14 commanding only unarmed?
 15 A. Yes. It's unlikely that they will be only commanding
 16 unarmed by the very nature of a marauding terrorist
 17 firearms attack. Again, I'm just trying to make the
 18 point that the focus in terms of span of command should
 19 be about what they are seeking to achieve and the area
 20 that they are operating within, not the assets that they
 21 are utilising, if that makes sense.
 22 Q. I think it does. What you're saying — and this is
 23 a phrase that you did use in your evidence last time —
 24 you were effectively saying last time that the command
 25 structure needs to be sufficiently flexible to

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1 accommodate that changing situation?
 2 A. Yes.
 3 Q. But equally, you were saying that the person in command
 4 needs to have, your phrase, absolute clarity about who
 5 and what they are commanding?
 6 A. Yes, a basic principle of police command.
 7 Q. So in a situation that is changing and moving, where
 8 there might be differences in terms of who is being
 9 commanded by the on-scene commander, how is that clarity
 10 to be achieved and whose responsibility is it to achieve
 11 that clarity?
 12 A. The responsibility for the overall effectiveness of the
 13 command structure sits with the person in strategic
 14 command, be that the strategic firearms commander if
 15 we're purely talking about the firearms deployment, or
 16 the Gold commander, if we're talking about the wider
 17 operation. But our authorised professional practice,
 18 for both armed policing and general operations that
 19 I referred to earlier, makes that very clear: it is the
 20 strategic commander that is responsible for an effective
 21 command structure. So that's the first part of it.
 22 The second part is that those commanders should
 23 always ensure that there is clarity in command, both in
 24 terms of their area of responsibility and areas of
 25 responsibility of other commanders, so that command

1 protocol of who is owning what, where and when. But
 2 equally, clarity with the resources deployed about who
 3 they are working to so that all of that comes together
 4 to deliver that effective response. So there's clarity
 5 at any given moment in time about who is in command of
 6 which assets and for what operational activity.
 7 Q. So in a situation where a particular commander at the
 8 scene is intended to have command of both armed and
 9 unarmed assets generally, the responsibility for
 10 ensuring that the commander at the scene has clarity
 11 in relation to that would be the responsibility of Gold
 12 because one is dealing with both armed and unarmed
 13 assets?
 14 A. It's the responsibility of the strategic commander to
 15 ensure that there's an appropriate command structure in
 16 place and that people are clear in terms of their area
 17 of responsibility. It's then incumbent upon those
 18 commanders to ensure that there are appropriate command
 19 protocols between those commanders so they are clear on
 20 who us owning what, where and when.
 21 Q. That is the way in which it was expected to work as of
 22 May 2017?
 23 A. Yes.
 24 Q. As you will appreciate, the chairman is concerned not
 25 only with whether that did or didn't work on the night

1 but with if it didn't work or didn't work as well as it
 2 might have done, what can be done to improve the
 3 situation. The chairman's question was: why can there
 4 not be a rule pushed down from CTPHQ that says, this is
 5 just an example, "In an MTFA response, in a Plato
 6 situation, at the scene there should be a commander with
 7 responsibility for the armed assets and a commander with
 8 responsibility for the unarmed assets," obviously under
 9 the overarching command of Gold?
 10 SIR JOHN SAUNDERS: Can I slightly split that? Do you mind
 11 if I break that down?
 12 MR GREANEY: Not at all, sir.
 13 SIR JOHN SAUNDERS: Because you have tried to make clear
 14 that the difference in a way is between forward-facing
 15 and the -- it's not behind the scenes but you know what
 16 I mean, the non-forward-facing.
 17 A. Yes.
 18 SIR JOHN SAUNDERS: You're saying that a ground-assigned
 19 might well be running it and in doing what he's doing,
 20 clearing the area, he might have armed and unarmed
 21 police doing that and he would control those.
 22 A. Yes.
 23 SIR JOHN SAUNDERS: So I want to have the distinction
 24 between the forward-facing ones when the ground-assigned
 25 is going, "I've got to clear the area", or whatever,

1 "all of those officers under my control, there are going
 2 to be others, behind operating cordons and things like
 3 that, who should be under someone else's control." Why
 4 shouldn't we do that?
 5 A. We do, sir. Again, we may be straying into where we are
 6 today that I think you're going to deal with --
 7 MR GREANEY: You're quite right to invite caution
 8 in relation to that.
 9 SIR JOHN SAUNDERS: If it has been clarified, that's fine
 10 and we will wait until we get the clarity. My concern
 11 has been -- I have heard from Gold who, in this
 12 particular instance on 22 May, was the strategic
 13 firearms commander, and I've heard from Mr Dexter, the
 14 ground-assigned. Both, if I may say so, without
 15 sounding in the least bit patronising, capable,
 16 intelligent police officers who had an entirely
 17 different view of what JOPs required of them in that
 18 situation.
 19 And what's more, Mr Dexter had been speaking to
 20 other people who were in the same position as him who
 21 agreed with him and I think the same may have been true
 22 of Gold as well, and that seemed to me to be a very
 23 worrying situation.
 24 A. What I would say is from our perspective, when the
 25 guidance was written, it was our perspective that those

1 issues would be clear because, as I said earlier, the
 2 JOPs and the Plato guidance shouldn't and can't be seen
 3 in isolation. So they have to be read in the context of
 4 all the other relevant command guidance. And if that
 5 command guidance is brought together and considered
 6 in the round, it was our position that it would make
 7 clear the point that you're making. However, as I am
 8 sure we will get to later, we've reflected on what's
 9 been heard at this inquiry, and in the current guidance
 10 we have endeavoured to make that even more explicit.

11 But certainly from my personal perspective, I think
 12 that it was clear at the time when all of the relevant
 13 guidance is taken together, as it should be, by the
 14 commanders that would be discharging those
 15 responsibilities in the response to an MTFA.

16 MR GREANEY: Sir, I have asked all the questions I propose
 17 to ask about the --

18 SIR JOHN SAUNDERS: I am not going to take that further
 19 because you have indicated you don't particularly want
 20 to get involved in the dispute.

21 A. I'm again very, very happy to assist the inquiry with my
 22 interpretation of guidance. I am just being very
 23 cautious not to get involved in offering a view on the
 24 actual decisions made by commanders on the night because
 25 my understanding of that is not my place but again

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1 I will be very much led by you, sir, and by counsel.

2 SIR JOHN SAUNDERS: I'm quite happy to leave it to hearing
 3 the experts later or for other people to ask questions.

4 MR GREANEY: I think that is (overspeaking) and moreover
 5 I think that is what the witness would be most
 6 comfortable with.

7 SIR JOHN SAUNDERS: It's obviously quite difficult in these
 8 particular circumstances in deciding between what is
 9 factual evidence and what is opinion evidence, as
 10 I think I and Mr Horwell discussed at the end of the
 11 last occasion.

12 MR GREANEY: Sir, I'm not going to take it any further
 13 forward. Obviously, others will make their own
 14 judgement about whether it's necessary to do so.

15 Let's move on to topic 5, and can I indicate my aim
 16 is to finish before lunch, which should mean that we can
 17 finish the evidence of the witness today, albeit I think
 18 it is going to be a long day.

19 SIR JOHN SAUNDERS: Okay.

20 MR GREANEY: Topic 5, Exercise Winchester Accord. I think
 21 we can probably deal with this fairly swiftly.

22 Does CTPHQ operate something called the CTP
 23 operational development unit or ODU?

24 A. It does.

25 Q. In a few sentences, please, what is the ODU?

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1 A. It is the national counter-terrorism policing unit
 2 responsible for organisational learning, training and
 3 exercising.

4 Q. When you last gave evidence, you explained to us that
 5 you would check whether the ODU had involvement with
 6 Exercise Winchester Accord and, if it did, what learning
 7 the ODU took from it.

8 A. Yes.

9 Q. You have very kindly addressed that again in your third
 10 witness statement at paragraphs 18 to 32. It's a long
 11 section but I think we can probably deal with it in
 12 fairly simple terms.

13 As a starting point, I believe you can confirm that
 14 the ODU was involved in facilitating Exercise
 15 Winchester Accord?

16 A. Yes, they were.

17 Q. There were, as we understand would commonly be the case,
 18 both national and local objectives?

19 A. Yes. So the exercise is delivered in partnership
 20 between the national ODU, the relevant regional
 21 Counter-terrorism Policing unit, and then the relevant
 22 constituent emergency services.

23 Q. At paragraph 22 of your statement you state:
 24 "For the MTFA element of Winchester Accord at the
 25 Trafford Centre, the national high level objectives of

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1 relevance were: (1) MTFA joint working with the Fire and
 2 Rescue Service and ambulance partners; (2) a regional
 3 ARV response to test regional firearms interoperability;
 4 (3) the deployment of both police operation room based
 5 and ground-assigned TFCs."

6 A. Yes.

7 Q. We've understood so far that the principal overall
 8 purpose of Exercise Winchester Accord was to do with,
 9 I express this carefully, the relicensing of military
 10 assets?

11 A. Yes, that is correct.

12 Q. In terms of the local objectives, is that something that
 13 the ODU took any particular interest in, in terms of
 14 setting them?

15 A. No, they wouldn't have responsibility for setting them.
 16 That would be the responsibility of the relevant ODU,
 17 for want of a better term, within the regional
 18 Counter-terrorism Policing unit on behalf of all those
 19 other constituent partners within that region. So the
 20 regional CTPU would drag that together and take that
 21 responsibility on behalf of their partners within the
 22 region.

23 Q. We know that one of the local objectives was, to
 24 summarise it, to test the FDO in an environment
 25 different from that that existed, namely in

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1 a headquarters environment. Was that at the time of
 2 Exercise Winchester Accord, in 2016, something that was
 3 of interest to CTPHQ?
 4 A. No, that was seen as being a regional or, more likely,
 5 local issue, specific to GMP. So that's why it appeared
 6 as part of the regional and local objectives for the
 7 exercise.
 8 Q. In due course, was a national post-exercise report
 9 created?
 10 A. Yes, it was.
 11 Q. And you set out the recommendations at paragraph 26,
 12 namely five recommendations. One related to raising the
 13 awareness amongst control room staff in relation to
 14 terminology they were likely to encounter during an MTFA
 15 scenario?
 16 A. Yes.
 17 Q. Recommendation 2 related to issues that were sensitive
 18 and in any event irrelevant.
 19 A. Yes.
 20 Q. 3 related to training for supervisors engaged in the
 21 provision of intelligence products?
 22 A. Yes.
 23 Q. 4 related to improved interoperability between the
 24 various CTP sections deployed as part of the subsequent
 25 investigation and at the direction of the

1 counter-terrorism senior investigating officer?
 2 A. Yes.
 3 Q. And recommendation 5 also related to the CTSIO's
 4 investigative strategy?
 5 A. That's correct.
 6 Q. Of those recommendations, was CTPHQ's interest in
 7 learning in relation to Operation Plato and MTFA?
 8 A. So CT Policing more broadly were interested in all five
 9 of those recommendations.
 10 Q. I understand.
 11 A. That's why they were accepted as national
 12 recommendations. The national ODU has a very embedded,
 13 resilient process for managing national recommendations.
 14 That involves allocating those recommendations out to
 15 the relevant national business owners and so
 16 recommendation 1 was the only one of those national
 17 recommendations that related to the business that the
 18 inquiry is currently interested in, ie the response to
 19 an MTFA. So that recommendation number 1 was allocated
 20 to my unit, as would be expected as the owners and
 21 guardians of that national MTFA guidance.
 22 Q. The question really that we were interested in an answer
 23 to when you first gave evidence, and remain interested
 24 in, is we all know now, and you will know, that Exercise
 25 Winchester Accord revealed the very issue that HMIC was

1 to refer to, namely the risk of the FDO being
 2 overburdened.
 3 A. Yes.
 4 Q. Obviously there were other issues that came out of it,
 5 but that was one of the issues that came out of it. Did
 6 that problem revealed by Exercise Winchester Accord come
 7 to the attention of CTPHQ?
 8 A. I can't remember, because this is from memory, I can't
 9 remember whether that was explicitly shared with us.
 10 However, what I would say, and I did allude to this in
 11 previous evidence and earlier, at the time of
 12 Winchester Accord that wasn't new news to us, it was
 13 something that we were already very cognisant of and had
 14 put those control measures or mitigating actions, as
 15 I've referred to them, in place through the national
 16 guidance.
 17 Q. So this was the very point that I was coming to.
 18 Thank you for getting there before me. Whether or not
 19 CTPHQ was specifically made aware of the problem that
 20 arose during Exercise Winchester Accord in this regard,
 21 CTPHQ was already very well aware that there was a risk
 22 that in the event of a real-life MTFA, the FDO,
 23 unassisted, would become overburdened?
 24 A. Yes.
 25 Q. And that was why, I understand you to be telling us,

1 that in the March 2017 refreshed guidance, measures to
 2 mitigate that risk were identified?
 3 A. Yes.
 4 Q. Such as, by way of example, the desirability of action
 5 cards and embedding those action cards?
 6 A. That's one example. There are other examples contained
 7 within that guidance.
 8 Q. Certainly that satisfies my interest in relation to
 9 Exercise Winchester Accord and CTPHQ. Sir, I'm going to
 10 move on unless you have any questions about that.
 11 SIR JOHN SAUNDERS: Thank you.
 12 MR GREANEY: So topic 6, the current joint operating
 13 principles and the current national Operation Plato
 14 guidance.
 15 As I'm certain everyone will understand, it would
 16 plainly be irresponsible in the highest order to
 17 rehearse the detail of the current JOPs and Plato
 18 guidance in public because, to put it very simply, that
 19 would be of considerable interest to and assistance to
 20 terrorists; do you agree?
 21 A. I do agree, yes.
 22 Q. But in your fourth witness statement, also dated
 23 1 July 2021, you have dealt with the current JOPs and
 24 Plato guidance, have you not?
 25 A. I have.

1 Q. And have you done so to the extent that it is
2 responsible to put matters into open?
3 A. Yes, I believe so.
4 Q. So you, by which I mean you as an individual, and CTPHQ
5 as an organisation, have understood that there is
6 plainly public interest --
7 A. Yes.
8 Q. -- legitimate public interest --
9 A. Yes.
10 Q. -- in whether things that didn't go well have been
11 improved and you have sought to balance that public
12 interest against the high undesirability of putting
13 material of assistance to terrorists into the public
14 domain?
15 A. That's correct, yes.
16 Q. So what I'm proposing to do, so that we do respect that
17 balance, is to take you through that witness statement,
18 or the relevant parts of it, but being careful not to go
19 beyond what you have said in that statement. Does that
20 seem like a sensible approach?
21 A. It does, yes, thank you.
22 Q. I'm going to start -- in fact, you set out the history
23 of the various iterations of documents, I don't think we
24 need to go through that. I'm going to start at
25 paragraph 10, so page 3 of your witness statement.

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1 The INQ reference is {INQ041668/1}. I'm starting at
2 {INQ041668/3}.
3 You tell us at paragraph 9 that in December 2020, so
4 indeed whilst the inquiry has been sitting, the MTA JOPs
5 edition 2 and the CTPHQ national Plato guidance
6 version 3 were published.
7 A. That's correct.
8 Q. So the edition references may be slightly confusing to
9 people because we know in January of 2016, JOPs
10 edition 3 came out.
11 A. Yes.
12 Q. Now you're telling us that in December 2020, JOPs
13 edition 2 came out. There is in fact a ready
14 explanation, namely that there was a movement from the
15 term "MTFA" to the term "MTA" and that rebooted the
16 edition numbers?
17 A. Yes. So during their lifetime, there have been six
18 editions of the JOPs. Four of those were MTFA JOPs, so
19 we got up to edition 4. And then in March 2019, there
20 was a change where they became the MTA JOPs, and so they
21 reverted back to edition 1, and we are now currently on
22 edition 2.
23 In terms of the Plato guidance, there have been four
24 iterations of that, but within policing we took the
25 decision that we would just remain with a numbered

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1 version approach irrespective of the change from MTFA to
2 MTA. Therefore that would explain why the Plato
3 guidance, the police single service guidance, is
4 currently at version 3, but the JOPs are at MTA
5 edition 2.
6 Q. I do hope that makes sense to people who are listening.
7 There's nothing in fact inexplicable about the edition
8 numbers, it relates to the fact that there was a change
9 in terminology, which you explained to us on the last
10 occasion.
11 But the simple fact of the matter is that earlier
12 today you and I looked together at the joint operating
13 principles that were in force in May 2017?
14 A. That's correct.
15 Q. We looked also at the refreshed national Plato policy
16 that was in force in May of 2017?
17 A. Yes.
18 Q. And there are now different versions of each document
19 that are in force?
20 A. Yes, there have been three versions of the JOPs and two
21 versions of the police single service guidance since
22 those that were extant at the time of the attack.
23 Q. And the current versions were published in December 2020
24 and I think came into force in January of this year?
25 A. That's correct, yes.

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1 Q. Is it the position that the 2020 documents were designed
2 to further reflect operational learning from domestic
3 and international incidents as well as national and
4 regional exercises?
5 A. Yes, we keep both documents under continuous review and
6 we are always exploring what organisational learning
7 there is out there, whether that be from actual attacks
8 or whether it be from training and exercising, to make
9 sure that the guidance remains up to date and relevant.
10 Q. Did the main changes to both documents involve the
11 following? First, and I am going to express this
12 carefully, in relation to zoning, in the two iterations,
13 has the description of each zone, so hot, warm and cold,
14 been simplified?
15 A. It has.
16 Q. And greater clarity provided regarding the deployment of
17 both non-specialist unarmed and specialist responders
18 into zones?
19 A. Yes. All of that is obviously in the context that the
20 guidance is now designed for a much broader range of
21 attack methodology, marauding terrorist attack rather
22 than it being primarily designed for marauding terrorist
23 firearms attack, as it was in 2017.
24 Q. So this is what you explained to us on the last
25 occasion, namely the change from MTFA to MTA was driven

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1 by a recognition, because of experience in the UK and
 2 around the world, that an attack might come from
 3 terrorists in a number of ways: a vehicle, a knife, any
 4 other kind of a weapon, not just a firearm?
 5 A. Yes. Again, to make the point, we're alive to all of
 6 the events that occur, not only globally but also here
 7 domestically, and I think, as I touched on last time
 8 I gave evidence, as we've seen since 2016/2017, where
 9 there have unfortunately been a number of terrorist
 10 attacks here on UK soil, up to press, touch wood, none
 11 of those attacks have been marauding terrorist firearms
 12 attacks, they have been less sophisticated attacks, as
 13 we talked about earlier, and so in light of what we are
 14 actually seeing in this country that was one of the main
 15 drivers for us to revisit the guidance and ensure that
 16 it was fit for purpose in terms of responding to the
 17 type of attack we were actually seeing.
 18 Q. Just to return to this first change in the new JOPs and
 19 guidance, the change to zoning description and so on
 20 reflects, is this correct, the important command
 21 considerations in relation to the appropriate deployment
 22 of all available resources, particularly during
 23 low-sophistication attacks?
 24 A. That's correct, yes.
 25 Q. Change 2 was in relation to Plato declaration?

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1 A. Yes.
 2 Q. Was greater clarity provided in respect of when Plato
 3 should be declared?
 4 A. It was.
 5 Q. Taking account of what you describe as recent
 6 operational learning?
 7 A. Yes.
 8 Q. Should we understand that that included what was known
 9 about the events of 22 May 2017?
 10 A. Yes, it includes what's been learnt in the intervening
 11 period about the events in May 2017 and also other
 12 events that we've seen, particularly domestically.
 13 Q. Was increased focus also provided in respect of the
 14 criticality, as you describe it, of the police informing
 15 other emergency services of all relevant incidents,
 16 irrespective of whether Plato had been declared?
 17 A. Yes.
 18 Q. Change 3. Did that relate to communication connectivity
 19 between control rooms?
 20 A. It did.
 21 Q. Did it reflect recent changes to the operational
 22 communications in policing guidance?
 23 A. Yes.
 24 Q. -- something referred to by Mr Horwell yesterday --
 25 regarding how the three emergency service control rooms

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1 communicate with each other?
 2 A. Yes. So historically, the national guidance has always
 3 talked about the imperative for the three emergency
 4 service control rooms to communicate in the early stages
 5 of an incident of this nature, but it's very much left
 6 it to local discretion as to how that is achieved,
 7 whether that be via a conference call or whether it be
 8 via Airwave radio communications. It was historically
 9 felt that it was most appropriate for the local services
 10 in any given locality to decide what worked for them
 11 best in terms of how that communication was achieved.
 12 The view has now been taken that actually the
 13 national guidance should be more prescriptive and it
 14 should actually define how that communication takes
 15 place, so that's what the current OCiP guidance does, it
 16 gives very clear direction about how that initial
 17 communication between the three control rooms will take
 18 place and that's via means of an Airwave or radio Talk
 19 Group.
 20 Q. And the joint operating principles, we'll remind
 21 ourselves, are applicable to all three emergency
 22 services?
 23 A. They are indeed, yes.
 24 Q. So those are the principal changes in broad terms to
 25 each of the documents, the JOPs and the Plato guidance:

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1 A. Yes.
 2 Q. But additionally, were changes made to the national
 3 Plato guidance which, as we know, relates to policing
 4 only, albeit policing generally?
 5 A. Yes, they were things of relevance purely to policing
 6 rather than all three emergency services.
 7 Q. Was further guidance for commanders on the deployment of
 8 unarmed and/or Taser officers to provide initial
 9 mitigation, where appropriate, given?
 10 A. Yes.
 11 Q. Particularly in relation to low-sophistication attacks?
 12 A. Yes.
 13 SIR JOHN SAUNDERS: I'm afraid I don't understand that.
 14 A. So that's ...
 15 SIR JOHN SAUNDERS: Don't tell me anything you ought not to
 16 tell me.
 17 A. That's about more detailed guidance for commanders to
 18 inform the considerations about where there is
 19 a low-sophistication attack, so something possibly
 20 involving bladed weapons or blunt weapons, how they can
 21 make use in the very early stages, make effective use of
 22 unarmed officers to mitigate that risk prior to the
 23 arrival of armed officers.
 24 SIR JOHN SAUNDERS: I understand now. Thank you.
 25 MR GREANEY: Did the new guidance also include

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1 considerations for commanders regarding linked attacks
 2 with gaps in time and/or proximity?
 3 A. Yes, so that was about some learning in terms of there
 4 being an attack and then a gap in time and geographical
 5 distance before there was a further attack. So it was
 6 just making the point more strongly to commanders that
 7 they should still consider whether those attacks are
 8 linked and so part of a marauding attack. Because
 9 I think it's fair to say that some commanders were
 10 thinking that it would only be a marauding attack if
 11 there was a short gap in time and distance between
 12 attacks. So it is just making the point to commanders
 13 that attacks may be linked even if there is some degree
 14 of gap in time or proximity between those attacks taking
 15 place. That was learning from an actual incident,
 16 non-terrorism, but an actual incident here within the
 17 UK.
 18 SIR JOHN SAUNDERS: But that reaffirms the need to
 19 potentially keep Operation Plato going for longer?
 20 A. To keep it under consideration, yes.
 21 SIR JOHN SAUNDERS: Thank you.
 22 MR GREANEY: Still dealing with changes to the latest
 23 edition of the Plato guidance, was there provided
 24 increased clarity as to how to manage the response to
 25 non-terrorism motivated marauding attacks?

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1 A. There was.
 2 Q. Was even greater emphasis on the need for local plans to
 3 recognise that the force control room inspector, initial
 4 TFC, and the wider control room staff were highly likely
 5 to face significant demand in managing the initial
 6 response?
 7 A. Yes. Again, the learning emerging from this inquiry and
 8 other incidents about -- it would appear there is a need
 9 for us to emphasise even more clearly that point that
 10 forces must have arrangements in place that will
 11 mitigate against that risk that we've talked about
 12 a number of times this morning.
 13 Q. Did the Plato guidance of December 2020 also make plain
 14 that local plans should articulate clearly how that
 15 burden upon the FDO and staff was to be managed and/or
 16 additional capacity provided in the critical early
 17 stages to prevent staff becoming overwhelmed?
 18 A. Yes. Re-emphasising of the point that had historically
 19 been made.
 20 Q. Finally, before you provide some further detail
 21 in relation to two of the changes, was greater clarity
 22 in relation to command roles, particularly
 23 ground-assigned commanders, given in the December 2020
 24 Plato guidance?
 25 A. It was, yes.

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1 Q. Finally on this sixth topic, you, Mr Thomas, have given,
 2 I believe, consideration to whether a more detailed
 3 explanation can be given in respect of any of the
 4 changes which are of particular value to the inquiry --
 5 A. Yes.
 6 Q. -- and you have identified two that fall into that
 7 category.
 8 A. Yes.
 9 Q. At section 2.4, does the New Plato guidance state that
 10 the declaration of Operation Plato should be made if
 11 it is believed that one or more of the following
 12 measures is required?
 13 A. Yes.
 14 Q. Activate and coordinate the response from emergency
 15 service partners, including the mobilisation of
 16 specialist responders?
 17 A. Yes.
 18 Q. That the MTA JOPs will be used by the emergency
 19 services --
 20 A. Yes.
 21 Q. -- to prepare responders and commanders for the nature
 22 of the threat?
 23 A. Yes.
 24 Q. So mindset preparation?
 25 A. Yes.

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1 Q. The mobilisation of regional or national armed
 2 resources?
 3 A. Yes.
 4 Q. And the mobilisation of the National Counter-terrorism
 5 Policing Network and partners, including central
 6 coordination, intelligence and investigative functions?
 7 A. Yes.
 8 Q. At section 10.7 does the Plato guidance provide greater
 9 clarity in relation to command roles and
 10 responsibilities in the following terms?
 11 "As the response to the incident builds,
 12 consideration should be given to the deployment of
 13 additional ground-assigned commanders to undertake
 14 outward-facing command roles such as outer cordons,
 15 RVPs, survivor reception centres, et cetera. This will
 16 allow the ground-assigned TFC fulfilling the role of
 17 on-scene commander to focus on working with partner
 18 agency commanders to preserve life and neutralise any
 19 ongoing threat."
 20 A. Yes.
 21 Q. That is a matter to which you drew the chairman's
 22 attention earlier?
 23 A. Yes.
 24 Q. Sir, as you will appreciate, there is a need to be
 25 careful about all of this. I don't propose to ask any

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1 further questions about the new iterations of those
 2 documents?
 3 SIR JOHN SAUNDERS: Thank you.
 4 MR GREANEY: That leads to the seventh and final topic
 5 during the course of this phase of your evidence, namely
 6 lessons that have been learned since May of 2017 by
 7 CTPHQ, steps that have been taken, and the CT5 report of
 8 the Inspectorate.
 9 A. Yes.
 10 Q. We'll aim to deal with this fairly swiftly, albeit
 11 I know it's of importance to CTP Headquarters.
 12 Was the driver for addressing the issues I have just
 13 mentioned in your fifth witness statement, which is
 14 dated 25 August 2021, that CTP Headquarters listened
 15 carefully to the evidence given by Deputy
 16 Chief Constable Pilling of Greater Manchester Police?
 17 A. We did, yes.
 18 Q. And wanted it to be publicly understood that work had
 19 been done by CTPHQ to address what might be thought to
 20 have been concerns?
 21 A. Yes.
 22 Q. First, in terms of lessons learned, is the issue of:
 23 "Unarmed officer awareness (Plato)."
 24 This is paragraph 19 of your fifth statement,
 25 page 4.

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1 So what are you able to tell us in relation to what
 2 changes have been made, if any, in relation to the
 3 awareness of unarmed officers about Operation Plato?
 4 A. Since the 2017 guidance came into being, there has been
 5 a significant amount of work undertaken by CT policing
 6 Headquarters and our partners as the national leads for
 7 this area of business in Fire and Rescue and ambulance,
 8 working in partnership with the Home Office, the
 9 Homeland Security Group at the Home Office, and a series
 10 of products have been developed and provided to local
 11 forces to enable them to deliver briefing awareness
 12 sessions and/or training to front line officers.
 13 Some of those products include videos, tri-service
 14 videos that outline the role of what are described as
 15 non-specialist responders across the three
 16 organisations. So that was a tri-service undertaking.
 17 There were then a series of PowerPoint presentations
 18 specifically for unarmed police officers and their
 19 supervisors, so sergeants and inspectors. Then there
 20 has been two iterations of the Stay Safe guidance and
 21 supporting aide-memoire, which is aimed at unarmed
 22 police officers, their supervisors and also for police
 23 control room staff.
 24 So as I say, a range of products that have been
 25 developed and provided to forces to enable them to

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1 ensure that their unarmed officers understand what is
 2 required of them during the response to a marauding
 3 terrorist attack.
 4 Q. Have I understood correctly that some of those
 5 materials, namely the video, have been made available
 6 not just to unarmed police resources but also to
 7 equivalent resources within the ambulance and Fire and
 8 Rescue service?
 9 A. Yes. Just to be clear, this is only considering it from
 10 a policing perspective. So the video was something
 11 created centrally between all three services, so the
 12 same product shared across the three organisations. The
 13 remaining products have purely been for a police
 14 audience. I know that it's the case that other products
 15 have been developed by Fire and Rescue and ambulance
 16 purely for their audience, so it's not just a case that
 17 the police have done something, Fire and Rescue and
 18 ambulance haven't done anything, they have, but I am
 19 only addressing this from a police perspective if that's
 20 clear.
 21 Q. That's certainly clear to me. Topic 2 under the same
 22 heading. We know, and indeed you referred to it earlier
 23 today, that in the summer of 2017 assurance visits were
 24 carried out by CTPHQ to police forces around the
 25 country --

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1 A. Yes, all police forces in the UK.
 2 Q. -- in the light of the refreshed guidance that had been
 3 issued in the March of that year?
 4 A. Yes.
 5 Q. In July and August of 2019, was that process repeated?
 6 A. It was because that followed the publication of the MTA
 7 JOPs edition 1 and version 2 of the Plato contingency
 8 planning guidance. So as soon as that new guidance was
 9 published, we then followed that up with an assurance
 10 process to ensure that it was being effectively embedded
 11 across all police forces in the UK.
 12 Q. In both of those assurance processes, 2017 and 2019, was
 13 one of the many areas examined awareness training
 14 delivered to unarmed officers and their supervisors
 15 in relation to Operation Plato?
 16 A. It was, yes.
 17 Q. We know that, in December 2020, further versions of the
 18 respective documents were published and have been in
 19 force since January of 2021. Have arrangements been
 20 made to repeat that assurance process in light of those
 21 further documents?
 22 A. Yes, they have.
 23 Q. When is it intended that that process should take place?
 24 A. It's intended that that will commence late September or
 25 early October of this year.

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1 Q. Is it intended that that process will involve conducting
2 what you describe as "deep dives of identified areas"?

3 A. Yes. Again, taking the learning from this inquiry and
4 others, we've identified areas that we think we should
5 consider in some detail. So we've identified those key
6 areas that we're going to conduct, as I describe it,
7 a deep dive of to make sure that we fully understand how
8 the forces are implementing those specifics from the
9 guidance.

10 Q. Will the areas of focus include front line unarmed
11 officers, namely their awareness, training and
12 exercising?

13 A. Yes.

14 Q. Front line unarmed supervisors and commanders for the
15 same purpose?

16 A. Yes.

17 Q. Force control room processes?

18 A. Yes.

19 Q. And will that include action cards?

20 A. It will.

21 Q. Force control room staff awareness, training and
22 exercising?

23 A. Yes.

24 Q. The initial TFC support arrangements?

25 A. Yes.

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1 Q. Which is no doubt in recognition of the significant
2 demands that CTPHQ is well aware and has been well aware
3 of for many years will fall upon such a person?

4 A. Yes.

5 Q. The training and exercising arrangements in place for
6 initial tactical firearms commanders?

7 A. Yes.

8 Q. The arrangements in place for the provision of on-scene
9 commanders, both initial and subsequent ground-assigned
10 tactical firearms commanders?

11 A. Yes.

12 Q. And the awareness, training and exercising of on-scene
13 commanders?

14 A. Yes.

15 Q. Finally during this phase of your evidence, I'm going to
16 ask you about the CT inspections of Her Majesty's
17 Inspectorate. We have heard evidence from Mr Buchan,
18 I'm sure you're aware of that.

19 A. Yes.

20 Q. And so we're well aware of the provisions of CT2, which,
21 as we know, in part informed the refreshed guidance of
22 March 2017.

23 A. It did.

24 Q. On 7 July 2020, did the Inspectorate publish their
25 Counter-terrorism Policing part 5 report?

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1 A. Yes, they did.

2 Q. Did that follow on from an inspection that took place
3 between September 2019 and January 2020?

4 A. Yes, that's when the fieldwork activity was undertaken.

5 Q. Was it in simple terms an inspection into the
6 effectiveness of the police firearms response to
7 terrorism?

8 A. Yes, it was.

9 Q. I'm now at paragraph 27 of that final statement.
10 What did the Inspectorate examine?

11 A. They wanted to establish whether the public could be
12 confident that forces have enough properly trained and
13 equipped firearms officers to respond to an MTA. They
14 wanted to determine whether firearms officers from
15 different forces could effectively work together
16 cross-boundary and they wanted to understand how those
17 assets worked alongside specialists such as the
18 counter-terrorist specialist officers or CTSFOs.

19 Q. And they had something that they could compare and
20 potentially contrast again, because of course CT2 had
21 been published in, I think, August of 2017?

22 A. It had.

23 Q. And did the Inspectorate conclude that real progress had
24 been made to build force preparedness for an MTA since
25 they had last inspected that area of policing as part of

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1 CT2?

2 A. Yes, they did.

3 Q. Did they note that local Plato response plans had
4 improved significantly since CT2?

5 A. Yes.

6 Q. And did they acknowledge the work that had been done by
7 CTPHQ working with local forces to get them right?

8 A. Yes, they did.

9 Q. Did the Inspectorate find that Plato plans were easily
10 accessible?

11 A. Yes.

12 Q. Practical to use?

13 A. Yes.

14 Q. And that within most forces there was a high level of
15 knowledge about them?

16 A. Yes.

17 Q. Did they note that working in the hot and warm zones was
18 well understood by firearms commanders and commanders
19 more generally?

20 A. By firearms officers and firearms commanders.

21 Q. By firearms officers and firearms commanders, quite
22 right.

23 What did the Inspectorate note in relation to force
24 control rooms?

25 A. That they'd also improved their readiness and

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1 preparedness to respond to an MTA since the Inspectorate
 2 last looked at that area in CT2 in 2017.
 3 Q. And in particular was it noted by the Inspectorate that
 4 all forces inspected by that stage made use of Plato
 5 cards or drop-down menus on their command and control
 6 system?
 7 A. Yes.
 8 Q. Did they find what you describe as absolute clarity on
 9 the role of the initial tactical firearms commander?
 10 A. Yes. That's the language used by HMICFRS, so they
 11 described it as absolute clarity on the role of the
 12 ITFC.
 13 Q. Was it noted that a few forces had more than one ITFC on
 14 duty to provide additional resilience?
 15 A. Yes, or other appropriate measures.
 16 Q. Did the Inspectorate in CT5 make five recommendations?
 17 A. Yes.
 18 Q. But only two of which are of relevance to the terms of
 19 reference of the inquiry?
 20 A. Yes.
 21 Q. What was the first relevant recommendation?
 22 A. That was a recommendation relating to the creation of
 23 a national on-call cadre of specialist firearms
 24 commanders, and I believe the inquiry has heard
 25 something about that, specialist firearms commanders as

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1 opposed to core, initial and cadre firearms commanders.
 2 It's important to note that this recommendation was
 3 in relation to post-attack armed activity rather than it
 4 being in respect of the initial armed response. But the
 5 Inspectorate noted that there should be a centrally
 6 maintained process for managing the call-out of those
 7 specialist, particularly tactical firearms commanders,
 8 which should be aligned with other national arrangements
 9 already in place for CT commander coverage and I believe
 10 again the inquiry's heard about the role of the CT
 11 commander.
 12 Q. We have, yes.
 13 A. So it's just a recommendation that we should have more
 14 robust arrangements in place to better cater for that
 15 subsequent phase following on from the initial response.
 16 SIR JOHN SAUNDERS: I think I'm right in saying that
 17 specialist firearms commanders are trained, depending on
 18 what they're going to do, to different levels?
 19 A. Yes, so they undertake the same training as initial and
 20 cadre tactical firearms commanders and then receive some
 21 additional training to enable them to better discharge
 22 the responsibilities around more complex firearms
 23 operations. That includes counter-terrorism operations.
 24 SIR JOHN SAUNDERS: That's this new group?
 25 A. Yes, the group already exists, but what we haven't got

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1 at the minute is formal on-call arrangements. So it's
 2 a case of goodwill, if you like. When we are seeking to
 3 activate those commanders, the Inspectorate have
 4 recommended we should have a formal on-call cadre so
 5 we can immediately get hold of somebody to work
 6 alongside the CT commander.
 7 SIR JOHN SAUNDERS: Thank you.
 8 MR GREANEY: Just on this first relevant recommendation, is
 9 CTPHQ currently in the process of working with the
 10 Chief Constables' Council to establish the national
 11 specialist cadre?
 12 A. Yes, we are.
 13 Q. When do you anticipate that that process will come to an
 14 end?
 15 A. I think that those arrangements will be in place by the
 16 end of this calendar year.
 17 Q. Did the second recommendation of relevance relate to the
 18 training provided to front line police officers,
 19 including supervisors, in relation to the response to
 20 a marauding terrorist attack?
 21 A. Yes, it did.
 22 Q. Did the Inspectorate find a mixed picture amongst
 23 forces?
 24 A. Yes, unfortunately.
 25 Q. In forces where a lot of efforts had been put into

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1 briefing staff on such a response, was there found by
 2 the Inspectorate to be a better understanding of
 3 individual roles?
 4 A. There was.
 5 Q. But in forces where those briefings didn't take place as
 6 often, staff were saying they were confused about the
 7 role that they would have during such an incident?
 8 A. Yes.
 9 Q. Did the Inspectorate note that this was disappointing
 10 because good quality briefing and training products had
 11 been provided to all forces by CTPHQ and the
 12 Home Office?
 13 A. Yes, so that was the Inspectorate recognising the
 14 quality of the products that I mentioned earlier.
 15 Q. That not all forces had used those products effectively?
 16 A. It would appear not.
 17 Q. And so what is to be done about that state of affairs?
 18 A. In light of that recommendation being shared with us by
 19 the Inspectorate, the senior national coordinator for
 20 Protect and Prepare, Lucy D'Orsi, previous coordinator
 21 for Protect and Prepare, wrote to all chief constables
 22 in December 2020 and stressed to them that she was
 23 disappointed that the Inspectorate had still found that
 24 to be the case and urged those chief constables to
 25 personally satisfy themselves that their officers had

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1 been briefed effectively on their role during an MTA.
 2 Q. Is that something that you will be looking at closely
 3 during the course of the assurance process later this
 4 year?
 5 A. Yes. As you examined earlier, that's going to be one of
 6 the areas of deep dive focus, as I described it.
 7 MR GREANEY: Mr Thomas, thank you very much for answering my
 8 questions in this phase of your evidence.
 9 Sir, we're very near to 1 o'clock.
 10 SIR JOHN SAUNDERS: We will break in a minute. There's one
 11 thing I want to take up.
 12 MR GREANEY: Of course, yes.
 13 SIR JOHN SAUNDERS: In practical terms, with the front line
 14 police officers involved in May 2017, they acted with,
 15 I'm sure we would all agree, great courage and bravery
 16 and did what they could.
 17 A. Yes.
 18 SIR JOHN SAUNDERS: But their main lack, as they felt it,
 19 was the inadequacy they had in having suitable medical
 20 training to help with the sort of emergency that would
 21 happen and the sort of injuries that happen from an
 22 explosion like this. Is that part of your concern, is
 23 that something which is being looked at to provide
 24 greater training and, as I say, does it come under your
 25 auspices?

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1 A. No. It doesn't fall directly to us, but the National
 2 Police Chiefs' Council are looking at that. There is
 3 a business area within National Police Chiefs' Council
 4 that has responsibility for first aid training for
 5 police officers and they are actively looking at that
 6 issue as to whether it would be appropriate to provide
 7 further first aid training to front line police
 8 officers.
 9 SIR JOHN SAUNDERS: Have there been improvements since
 10 May 2017? If you can't answer, say you can't answer.
 11 A. I was just going to say, I'm probably not best placed to
 12 answer that one.
 13 SIR JOHN SAUNDERS: We will find out.
 14 MR GREANEY: We may have the answer in the evidence of
 15 Mr Pilling and Mr O'Callaghan that there have not been
 16 changes, at least not substantial changes, until the
 17 evidence of Brigadier Hodgetts, but each of them is now
 18 behind change taking place.
 19 Just before we break, as I anticipate we will for
 20 a moment before lunch, could I just do a poll to find
 21 out how long people think their questions will be so
 22 that we can manage what aren't the straightforward
 23 arrangements this afternoon. Can I ask Mr Horwell first
 24 of all.
 25 MR HORWELL: About 10 minutes or so, sir.

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1 MR GREANEY: Very helpful indeed, thank you.
 2 Mr Davies, if he is on the link.
 3 MR WOOD: Mr Davies isn't on the link, Mr Greaney, Mr Wood
 4 is in his place. I would hope to be no more than
 5 15 minutes.
 6 MR GREANEY: Thank you very much.
 7 Mr Atkinson?
 8 MR ATKINSON: Less than half an hour.
 9 MR GREANEY: And Mr Weatherby has 5 minutes. And Mr Butt?
 10 MR BUTT: If anything, 5 minutes, sir.
 11 MR GREANEY: That's very reassuring. With that in mind,
 12 could we take a break, please?
 13 SIR JOHN SAUNDERS: Thank you. 1.55?
 14 MR GREANEY: Fine, sir, yes.
 15 (12.57 pm)
 16 (The lunch adjournment)
 17 (1.55 pm)
 18 MR GREANEY: Sir, good afternoon. Could I invite Mr Horwell
 19 to ask his questions, please?
 20 MR HORWELL: Sir, can I first address you before I ask the
 21 witness questions. Both yesterday and today, you have
 22 done your best to summarise what is obviously very long
 23 and complex evidence and you have referred to a police
 24 officer or police officers having described the scene as
 25 cold, a cold zone.

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1 SIR JOHN SAUNDERS: Sorry, I should have said it's in the
 2 police expert report. If I didn't say that, then I'm
 3 sorry, that's my fault.
 4 MR HORWELL: Then if there's confusion, I'm sure it's my
 5 fault.
 6 SIR JOHN SAUNDERS: I'm sure it's my fault for not saying it
 7 but that's where I think it came from.
 8 MR HORWELL: That's the only source of it.
 9 SIR JOHN SAUNDERS: Yes, absolutely.
 10 MR HORWELL: Thank you.
 11 SIR JOHN SAUNDERS: Thank you.
 12 Questions from MR HORWELL
 13 MR HORWELL: Mr Thomas, as far as your evidence in these
 14 open proceedings is concerned, you were asked about the
 15 very limited national involvement in Winchester Accord.
 16 A. Yes.
 17 Q. You referred, as you did in your witness statement, to
 18 a report prepared by the operational development unit,
 19 the ODU.
 20 A. The national ODU.
 21 Q. The report is headed "National Counter-terrorism
 22 Policing: Operational Development Unit".
 23 A. Yes. That's the national --
 24 Q. That's the report?
 25 A. Yes.

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1 Q. That report sets out the principal objectives. Two of
 2 them are redacted. One is plainly irrelevant for our
 3 purposes and the fifth and last is:
 4 "Counter-terrorist command and control structures
 5 and processes at a tactical level."
 6 A. Yes.
 7 Q. That would obviously involve the operations room --
 8 A. Yes.
 9 Q. -- for the exercise? It plainly did involve the
 10 operations room because, as you said this morning, the
 11 only recommendation that is relevant to this hearing is
 12 recommendation 1, which is raising the awareness amongst
 13 control room staff regarding terminology they are likely
 14 to encounter during an MTFA.
 15 A. Yes, from the national report, yes.
 16 Q. From the national report, if there had been a concern
 17 about a catastrophic failure of the FDO in this
 18 exercise, you would have expected that to have found its
 19 way into the report?
 20 A. Not necessarily the national report, sir, no. If it was
 21 believed that any catastrophic failure, as you refer to
 22 it, was as a consequence of local arrangements then that
 23 would be for the local forces and agencies to address
 24 that. It would only be if it was something that was
 25 believed to be of national relevance that hadn't already

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1 been addressed at the national level that I would expect
 2 it would make its way into the national report.
 3 Q. There's a two-page summary of day 1 of the exercise
 4 in the ODU report. You would have expected there to
 5 have been some reference there, wouldn't you, to
 6 a catastrophic failure of the FDO? Come on, Mr Thomas.
 7 A. That's difficult for me to answer, Mr Horwell, because
 8 if it appears -- so if it's drawing from the local or
 9 regional organisational learning, then, as I say, my
 10 expectation would be if there wasn't anything that was
 11 of national significance, no matter how significant it
 12 was locally, then it would be a matter for the local or
 13 regional report because it's a local and regional issue
 14 that doesn't need to be addressed at the national level.
 15 Q. Not a matter of national significance or importance?
 16 A. If the --
 17 Q. Is that really your evidence, Mr Thomas?
 18 A. If the issue is something that is identified as being
 19 a local or regional issue and something that is already
 20 felt to be suitably addressed at the national level then
 21 I'm not surprised if it didn't make its way into the
 22 national report. I would very much expect it to be in
 23 the regional or local report, but not necessarily in the
 24 national report.
 25 Q. Not even a passing reference?

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1 A. I wasn't involved in the drawing-up of either the
 2 national report or the regional report.
 3 Q. I'm aware of that, Mr Thomas.
 4 A. But if it is something, again apologies for essentially
 5 repeating what I've already said, but if it is something
 6 that is determined as a local or regional issue and
 7 it isn't determined that it's got national carry-over or
 8 relevance, then I wouldn't be surprised if it only
 9 appeared in the local or regional report.
 10 Q. Well, you say you wouldn't be surprised, Mr Thomas.
 11 Others may well be.
 12 SIR JOHN SAUNDERS: I'm feeling a bit like a jury at the
 13 moment, Mr Horwell. Would that be a wrong impression?
 14 MR HORWELL: I haven't been in front of a jury for as long
 15 as I can remember.
 16 SIR JOHN SAUNDERS: You can obviously remember it, the
 17 technique!
 18 MR HORWELL: Questions that you were asked about the command
 19 structure at the scene and the issue -- as you are well
 20 aware, Mr Thomas, it was featured in your evidence when
 21 you were last here, as it has done today -- of the role
 22 of the GATFC. It's in your witness statement and again
 23 of course we can all refer to it later if necessary, but
 24 in your witness statement -- and this is your third
 25 witness statement -- you refer to evidence that was

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1 given at the London Bridge and at the Fishmongers' Hall
 2 inquests.
 3 A. Yes.
 4 Q. This is paragraph 46, it's page 11 of that third witness
 5 statement, and you refer there to the Metropolitan
 6 Police on-scene commander, the GATFC, taking command of
 7 all police assets at the scene, including unarmed police
 8 resources and even directing ambulance and other
 9 personnel in the absence of the London Ambulance Service
 10 commander.
 11 A. That's correct, sir, yes.
 12 Q. In terms of command structure at the scene, I hope this
 13 is a fair summary of your evidence, you would expect
 14 those either at the scene or in the operations room to
 15 be satisfied that there was a workable command structure
 16 in place?
 17 A. Yes, sir.
 18 Q. And if it's necessary to go to the relevant section of
 19 JOPs, it's {INQ008372/11}. It's the top half of the
 20 page, Mr Lopez, please:
 21 "During the marauding phase of an attack, the
 22 information and intelligence picture is likely to be
 23 very confused. During this phase the TFC based in the
 24 force control/operations room is the person most likely
 25 to be best placed to make an effective assessment of the

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1 location of the attacks and location of the terrorists .
 2 Therefore a clear command protocol and effective
 3 communications should be established between the
 4 control/operations room based TFC and the police
 5 on—scene commander.”
 6 So under the system that is envisaged in JOPs,
 7 between the GATFC and the FDO, as described in GMP
 8 parlance, you would expect there to be a clear command
 9 protocol between them?
 10 A. Yes.
 11 Q. Discussed and agreed?
 12 A. Yes.
 13 Q. As to the role of the police on—scene commander, just to
 14 pick certain aspects of it, we're all relatively
 15 familiar now with the content of the document, but there
 16 is a responsibility to set up an FCP?
 17 A. There is.
 18 Q. To take part in a joint assessment of risk?
 19 A. Yes.
 20 Q. To decide and declare zones?
 21 A. Yes.
 22 Q. To ensure with the other emergency services that life is
 23 saved, and that, in most circumstances, not all, but
 24 that in most circumstances would be the speedy
 25 extrication of casualties?

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1 A. Yes.
 2 Q. And all of that would be the responsibility of the
 3 police on—scene commander, you've agreed?
 4 A. Yes, all that forward—facing activity, as I have
 5 described it, yes.
 6 Q. That's exactly the words I was about to use. All of
 7 that is forward—facing?
 8 A. Yes.
 9 Q. And obviously police officers going to the scene of the
 10 attack, they will be unarmed, under armed protection
 11 hopefully, but those unarmed officers going to the
 12 attack site to extricate casualties, they will be in the
 13 overall command of the police on—scene commander?
 14 A. That's my view, sir, yes.
 15 MR HORWELL: Mr Thomas, that's all I ask at this stage,
 16 thank you.
 17 MR GREANEY: Could I ask Mr Wood to ask his questions,
 18 please.
 19 Questions from MR WOOD
 20 MR WOOD: Good afternoon, sir.
 21 SIR JOHN SAUNDERS: Good afternoon.
 22 MR WOOD: Mr Thomas, can you see and hear me?
 23 A. I can, thank you, yes.
 24 Q. There are two topics I want to address with you, please.
 25 The first is what I think was described in one of your

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1 witness statements as hot zone activity, okay?
 2 A. Yes.
 3 Q. You describe in your third witness statement the
 4 overarching strategic aim of JOPs being the preservation
 5 of life. It's in paragraph 10 if you want to look at
 6 it, but I think that's uncontroversial.
 7 A. Yes.
 8 Q. You set out a hierarchy of elements that may be part of
 9 that strategy, the first two of which, as we know, are
 10 minimising the risk to the public and maximising the
 11 safety of responders; is that right?
 12 A. Yes, sir.
 13 Q. In that order; yes?
 14 A. Yes.
 15 Q. JOPs 3, because I'm obviously only asking you about
 16 what was in force in May 2017, JOPs 3 is explicit about
 17 the expectations of who is deployed into certain zones,
 18 isn't it?
 19 A. Yes, it's explicit in the context that it is guidance,
 20 principles, as we discussed earlier today.
 21 Q. I well understand that point. Do you agree that it is
 22 less explicit, or indeed not explicit at all, about the
 23 withdrawal of people who may find themselves in a hot or
 24 a warm zone?
 25 A. I think that it does speak to that. As to the

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1 judgements as to whether that is sufficiently explicit
 2 or not, then that's probably a matter of conjecture.
 3 Q. Perhaps you can point to me, if we come across an
 4 example of it being explicit, certainly in respect of
 5 responders, as we go through the document, okay?
 6 A. Okay.
 7 Q. Because my questions here are focused as much on
 8 emergency responders as they are on members of the
 9 public; do you understand?
 10 A. Yes.
 11 Q. Firstly, in respect of hot zones, JOPs is explicit that
 12 it is only armed police who will be deliberately
 13 deployed to a hot zone; do you agree?
 14 A. Yes. I think there was — sorry, yes, that's correct.
 15 Q. Right. If anyone needs a reference, it's a footnote to
 16 paragraph 4.8 on page 13. We can look at it if we need
 17 to.
 18 If unarmed police officers found themselves in a hot
 19 zone, JOPs, I think, doesn't specifically say that they
 20 have to withdraw, but would it be your expectation
 21 ordinarily that they would do?
 22 A. In the context of a marauding terrorist firearms attack
 23 then yes, that is highly likely by the nature of what is
 24 taking place in a hot zone, as I discussed earlier with
 25 Mr Greaney.

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1 Q. If it's a proper hot zone, if I can put it that way, as
 2 you have described it, unarmed police would be expected
 3 to withdraw, do you agree?
 4 A. That is likely because of the level of risk to them and
 5 their inability to protect themselves.
 6 Q. Thank you. And certainly you would expect any medical
 7 professionals, certainly those without PPE, to withdraw
 8 from a hot zone?
 9 A. Yes, in pursuance of maximising the safety of them in
 10 line with the strategy.
 11 Q. Thank you. In terms of warm zones, specialist emergency
 12 personnel will deploy into hot and warm zones; that's
 13 right, isn't it?
 14 A. Yes.
 15 Q. And emergency personnel who are not in possession of
 16 full ballistic PPE will not normally be deployed into
 17 a warm zone; is that right?
 18 A. Yes, again in the context of a marauding terrorist
 19 firearms attack and by the nature of the descriptor of
 20 what a warm zone is and the likelihood of attackers
 21 reentering and presenting a threat with firearms.
 22 Q. Thank you. Can we just look, please, on the screen at
 23 paragraph 4.16 of JOPs 3? {INQ008372/17}.
 24 I may have misunderstood — and if I have, then
 25 please tell me — this section, 4.16. Is it your

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1 evidence that your intention when this paragraph was
 2 drafted was that it could allow for medics or fire
 3 personnel not wearing ballistic PPE to be deployed into
 4 a warm zone?
 5 A. I can only speak from a police perspective. Colleagues
 6 representing Fire and Rescue and ambulance on a national
 7 level were also involved in working with the Home Office
 8 to develop this guidance, and so clearly I'm looking
 9 through the lens of the police service, it is not for me
 10 to particularly stray into decision—making on behalf of
 11 the other two emergency services.
 12 Q. Because if I may say so, and I understand that answer,
 13 it's fairly clear, isn't it, that what that paragraph
 14 says is that emergency personnel as a whole will not go
 15 into a warm zone unless they have specialist PPE with
 16 the caveat that police officers may be deployed there if
 17 thought appropriate by the police commander? Do you
 18 agree?
 19 A. Without appearing pedantic, 4.16, as the heading, is of
 20 relevance to personnel from all three emergency
 21 services.
 22 Q. Yes.
 23 A. And then there is further context added in the paragraph
 24 underneath that that is specific to police officers. So
 25 4.16 as a header is making a comment in respect of

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1 personnel from all three emergency services.
 2 Q. Yes, and that says they won't normally be deployed into
 3 a hot zone, doesn't it?
 4 A. Normally it does, yes.
 5 SIR JOHN SAUNDERS: Is the exception for unarmed officers
 6 because they do have some degree of personal protective
 7 equipment, whereas paramedics may not? Is that the
 8 distinction or not?
 9 A. And training and an expectation by the public that
 10 police officers will potentially, may, put themselves in
 11 harm's way to protect the public. So it's a combination
 12 of those three things and I think it was accepted at the
 13 time that this was written that there would be
 14 a potentially higher appetite for risk in terms of the
 15 deployment of police officers, non—specialist unarmed
 16 police officers, when considered against non—specialist
 17 fire and ambulance personnel. I think that's why the
 18 additional context is provided below the heading to
 19 4.16.
 20 SIR JOHN SAUNDERS: Thank you.
 21 A. If that helps.
 22 MR WOOD: Thank you. Even with that extra context, the
 23 governing principle as a starting point is that police
 24 officers, unless they are wearing specialist PPE, do not
 25 go into a warm zone; do you agree?

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1 A. Yes, on the basis of responding to a marauding terrorist
 2 firearms attack.
 3 Q. Yes. And in terms of withdrawal as opposed to
 4 deployment of individuals in a warm zone, again JOPs 3
 5 seems to be, strictly speaking, silent on that issue,
 6 doesn't it?
 7 A. Yes, but I would say that it is fair to say that
 8 commanders would understand that the same considerations
 9 are at play in terms of deploying resources into a zone
 10 as they would be for considering whether those resources
 11 that are already there, potentially having
 12 self—deployed, whether they should withdraw or not.
 13 I think it's the same context and principle.
 14 Q. You've anticipated my next question, thank you. In the
 15 same way as with deployment, ordinarily non—specialist
 16 personnel should not be in a warm zone, and if they
 17 found themselves in one, subject to the discretion
 18 you've talked about, you would expect them to be
 19 withdrawn; do you agree?
 20 A. On the basis of a decision made by either themselves or
 21 their commanders, utilising either the JDM or the NDM,
 22 so taking consideration of all the prevailing factors.
 23 Q. Thank you.
 24 A. As I said earlier, these are not perceived as rules,
 25 they are perceived as principles that will inform

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1 decision-making, utilising either the JDM or the NDM.
 2 SIR JOHN SAUNDERS: Does JOPs 3 deal with the situation
 3 which arose on 22 May that you had unarmed or you could
 4 have unarmed police or members of the public in what
 5 then becomes a hot zone or is then defined as a hot zone
 6 or a warm zone and whether they should -- does it deal
 7 with that situation, what they should do?
 8 A. Yes, I would contend that it does, sir .
 9 SIR JOHN SAUNDERS: This is the bit that deals with it, is
 10 it ?
 11 A. I think it deals with it in different places throughout
 12 the document where it talks about the deployment into
 13 zones, advice that should be given to individuals ,
 14 particularly members of the public. We spoke this
 15 morning about advice that would be given to members of
 16 the public within a warm zone in terms of the
 17 organisations, the emergency services, meeting their
 18 obligation to --
 19 SIR JOHN SAUNDERS: They have to be told there's a risk to
 20 life, don't they?
 21 A. Yes, exactly.
 22 SIR JOHN SAUNDERS: Sorry, Mr Wood.
 23 MR WOOD: Not at all, sir, thank you.
 24 Finally in respect of zones, please, you were asked
 25 some questions by Mr Greaney about the approach to be

1 taken when moving from a warm to a cold zone; do you
 2 remember that?
 3 A. Yes.
 4 Q. The initial stages of a marauding terrorist firearms
 5 attack may well be very confused, I think you said more
 6 than once.
 7 A. Almost certainly.
 8 Q. And the intelligence picture may well take quite some
 9 time to settle down before people can be confident about
 10 what it shows; do you agree?
 11 A. Yes, the whole ethos in terms of command in this type of
 12 environment is that the commanders are desperately
 13 trying to turn what we describe as assumption into fact.
 14 So in those early stages commanders are having to make
 15 assumptions based on the information and intelligence
 16 available to them. As the incident develops, they are
 17 using everything available to them to try and turn that
 18 assumption into fact that will then better enable
 19 informed decisions to be made.
 20 Q. Just so. An explosion followed by an attack by gunmen
 21 in May of 2017 was a very current methodology, wasn't
 22 it ?
 23 A. It was, yes, internationally .
 24 Q. Yes. And it is impossible for commanders on the ground
 25 or dealing with the incident to know with real clarity

1 whether a further firearms attack is imminent; do you
 2 agree?
 3 A. Yes, definitely agree.
 4 Q. We know the definitions of a cold zone and a warm zone
 5 in JOPs and the warm zone definition is where attackers
 6 could enter or re-enter imminently and that area cannot
 7 be guaranteed as safe.
 8 A. Yes.
 9 Q. You added a gloss to that in your witness statement,
 10 your third witness statement at paragraph 14. I'll read
 11 it to you, but please go there if you want to make sure
 12 I'm right. It says this:
 13 "Areas should be defined as a warm zone where the
 14 attackers are not currently believed to be present but
 15 could enter or re-enter imminently. This may be because
 16 the armed police have not as yet either neutralised or
 17 contained the attackers within a hot zone or where it is
 18 believed that there are other as yet unidentified
 19 attackers within the general area ... "
 20 A. Yes.
 21 Q. Then you go on to say:
 22 "... as attackers in possession of firearms could
 23 enter a warm zone and commence shooting people without
 24 any notice."
 25 You then have to go on to consider whether to deploy

1 assets that don't have appropriate ballistic equipment;
 2 do you see that?
 3 A. Yes.
 4 Q. It may very well be that firearms officers are able to
 5 attend and sweep through a scene quite quickly, one
 6 would hope they would; would you agree?
 7 A. Yes, the training is focused in that direction .
 8 Q. And to that extent, establish control over a particular
 9 zone; do you agree?
 10 A. Yes.
 11 Q. But if gunmen return to that zone, there is still a risk
 12 to the people operating inside it, isn't there?
 13 A. There is if that zone isn't able to be secured by the
 14 deployment of armed officers.
 15 Q. Because even if armed officers neutralise new attackers
 16 quickly, there's still a risk of gunshots into the zone,
 17 isn't there?
 18 A. Dependent on the environment and the topography, yes,
 19 absolutely.
 20 Q. Yes. That's why you would need to have people within
 21 that zone with ballistic PPE if at all possible; do you
 22 agree?
 23 A. Yes, and that's one of the judgement calls of the
 24 commanders working collectively on the basis of the
 25 intelligence and information available to them and all

1 those environmental implications, such as the lay of the
 2 land, solid brick walls, et cetera, yes.
 3 Q. Just so. But if you have an environment where there
 4 are, for example, multiple entry and exit points in
 5 a large public space, you can't move from warm to cold,
 6 as I understand your evidence, until you have reasonably
 7 excluded the possibility of gunmen returning to that
 8 zone; would you agree?
 9 A. Yes.
 10 Q. Including by reference, for example, as you said, to the
 11 topography of the zone?
 12 A. Yes, absolutely.
 13 SIR JOHN SAUNDERS: So it's a matter for judgement of
 14 whoever is the senior armed officer there as to whether
 15 the distribution of them around the perimeter of
 16 wherever the space is, is sufficient to give safety to
 17 those inside from any attacker turning up --
 18 A. Yes, again subjective to --
 19 SIR JOHN SAUNDERS: -- otherwise you just have to keep it as
 20 warm forever?
 21 A. So a subjective decision based on that commander's
 22 understanding of the situation at the time, yes, and
 23 again, I keep coming back to this, but every situation
 24 will be different to some degree and that's why the
 25 responsibility sits on the shoulders of those commanders

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1 to make those subjective decisions in light of the
 2 underpinning guidance and what they see themselves to be
 3 dealing with at that particular time.
 4 SIR JOHN SAUNDERS: And the necessity -- I'm sorry to
 5 interrupt, Mr Wood -- for commanders to have a clear
 6 understanding of what is meant by the zoning and what
 7 the zones are? So "warm going cold" isn't a zone known
 8 to JOPs, is it?
 9 A. No, that wouldn't be a description you would find in the
 10 documents or one that I would use.
 11 SIR JOHN SAUNDERS: Okay, thank you.
 12 MR WOOD: But you would understand that as meaning: this is
 13 a warm zone and the criteria for it becoming a cold zone
 14 are rapidly approaching depending on what further
 15 information I'm given?
 16 A. Your explanation makes absolute sense. I'm not sure
 17 that I would definitely understand that from the initial
 18 phrase that you used. I think, again, there would be
 19 a degree of subjectivity and interpretation that would
 20 come into that. So the explanation you give makes
 21 absolute sense to me.
 22 Q. Thank you, Mr Thomas. Second topic, please. That is
 23 the evidence that you have given about the role of the
 24 ground--assigned tactical firearms commander and the
 25 on--scene commander. I hope I can do this without

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1 stating the obvious too much.
 2 The purpose of JOPs is to devise a command structure
 3 and operating principles to mitigate terrorist threat
 4 and facilitate removing injured people; do you agree
 5 with that as a broad statement?
 6 A. I do, yes.
 7 Q. Thank you. It's for that reason that they are
 8 guidelines which are not prescriptive, as you've told
 9 us; yes?
 10 A. Yes.
 11 Q. And why, as you told us, you have to read these
 12 documents alongside other documents?
 13 A. Yes.
 14 Q. We don't need to look at it, but for example in the
 15 foreword to JOPs it says you have to use them to inform
 16 existing major incident procedures and they must be used
 17 in conjunction with local and national SOPs; yes?
 18 A. Yes.
 19 Q. So for GMP in May 2017, that means using these guidance
 20 documents alongside and in conjunction with their major
 21 incident plan and their own standard operating
 22 procedures; yes?
 23 A. Yes.
 24 Q. What JOPs 3 definitely doesn't say is that the
 25 ground--assigned tactical firearms commander is expected

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1 to have formal command of all the unarmed assets at the
 2 scene, does it?
 3 A. No.
 4 Q. Indeed, it doesn't say that the on--scene commander is
 5 expected to have formal command of all unarmed assets
 6 at the scene?
 7 A. No. Again, the context that I put around that is that,
 8 as I described earlier, around the on--scene commander,
 9 as described within JOPs, being responsible for that
 10 mitigation of ongoing threat and life--saving activity.
 11 That's the context of that role.
 12 Q. Yes.
 13 A. It's not the expectation that that commander will be
 14 responsible for all activity in and around the scenes of
 15 ongoing threat.
 16 Q. Exactly, because they've got a specific purpose under
 17 JOPs, which is that they're an appropriate commander who
 18 leads the joint assessment of risk and makes the
 19 decision on where to deploy assets; is that right?
 20 A. Yes.
 21 Q. So they're the one who has to co--locate, identify zones
 22 and identify the limits of exploitation; yes?
 23 A. Yes.
 24 Q. And it's for that reason that the on--scene commander
 25 needs to be, when it can be, a tactical firearms

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1 commander; yes?
 2 A. That's correct, yes.
 3 Q. That is why, when the ground—assigned tactical firearms
 4 commander arrives, he or she becomes the on—scene
 5 commander; yes?
 6 A. Yes.
 7 Q. I want to develop that shortly a little further because
 8 before the ground—assigned tactical firearms commander
 9 arrives, JOPs is explicit that the on—scene commander
 10 may not be a TFC at all, isn't it?
 11 A. In many forces it's highly unlikely that they will be.
 12 They're likely to be a front line uniformed sergeant or
 13 inspector.
 14 Q. Yes. Could it also be, in the right circumstances, that
 15 the on—scene commander would be an operational firearms
 16 commander?
 17 A. That's possible, but that would depend on the
 18 availability of more than one operational firearms
 19 commander, I would suggest, because in the early stages
 20 I think it's likely that if there is only one
 21 operational firearms commander immediately available,
 22 their focus will be elsewhere.
 23 Q. Because you gave evidence to Mr Greaney about the need
 24 for the interim tactical firearms commander, effectively
 25 the FDO in Manchester, to make decisions about zoning as

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1 soon as possible. Do you remember that?
 2 A. Yes.
 3 Q. And that's taking into account as much information as
 4 they can do from the scene as soon as they can; yes?
 5 A. Yes. So that FDO, in GMP parlance, is the initial
 6 tactical firearms commander.
 7 Q. Yes.
 8 A. They need somebody representing their interests at
 9 a supervisory or command level as soon as practicable,
 10 and JOPs and the Plato guidance recognise that for many
 11 forces, that is likely to be a front line sergeant or
 12 inspector. However, I do take your point that there may
 13 be circumstances where it may be an operational firearms
 14 commander, but that will again depend on how many
 15 operational firearms commanders are immediately
 16 available and what other activity is going on at the
 17 scene and therefore what other priorities operational
 18 firearms commanders may have at that time. So again,
 19 a range of considerations for the commanders, dependent
 20 on the specifics of the incident.
 21 Q. Thank you. Were you aware, and if you weren't then
 22 of course say so, that one of the policy documents for
 23 Greater Manchester Police — I can provide, of course,
 24 the reference if need be — states that the OFC should
 25 remain at the RVP/FCP until relieved by the GATFC?

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1 A. No, I wasn't aware of that.
 2 Q. But I think you've accepted that, dependent on the
 3 availability of the number of OFCs, it may well be right
 4 that an OFC is the on—scene commander for the purposes
 5 of JOPs until they are relieved by a GATFC?
 6 A. It may be, but again remembering that the focus is on
 7 neutralising that threat and so the OFC, in line with
 8 their primary responsibility, needs to ensure that the
 9 firearms officers are implementing effectively the
 10 tactical plan set by the tactical firearms commander, so
 11 that's where their initial focus needs to be. If there
 12 is capacity either for that one individual or because
 13 there are readily available more than one OFC, then
 14 I can see that that may be a role that they would
 15 undertake as an option to it being an unarmed sergeant
 16 or inspector. But again, different force structures,
 17 the nuances of the particular incident and the
 18 considerations by the tactical commanders should drive
 19 that decision—making.
 20 Q. Thank you. Just to finish off my questioning — I don't
 21 have very much left, Mr Thomas — after the GATFC has
 22 arrived and assumed the role of on—scene commander, you
 23 told Mr Horwell there needs to be a clear command
 24 protocol between the ITFC and the GATFC; yes?
 25 A. Yes.

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1 Q. But obviously, that's in respect of what the span of
 2 command, as I think you have described it, is for the
 3 GATFC; yes?
 4 A. Yes. The two commanders need to agree who is going to
 5 be responsible for what, where and when.
 6 Q. Yes.
 7 A. There needs to be absolute clarity about that.
 8 Q. Thank you. The incident may very well remain fluid and
 9 dynamic for some time after it has begun, may it not?
 10 A. Yes.
 11 Q. The command structure has to be flexible to the
 12 possibility of a further attack at the scene; yes?
 13 A. Yes, and that is very much underpinned by the authorised
 14 professional practice for both armed policing and
 15 generic operations that I referred to earlier. They
 16 both make that point about the ability of the command
 17 structure to flex according to the need as the incident
 18 and the response develops.
 19 Q. Yes. Because it also needs to be flexible to the
 20 possibility of another attack at a different location,
 21 doesn't it?
 22 A. Yes, it does.
 23 Q. And if there's an attack at another location, for
 24 example, it may be that the GATFC has to move; would you
 25 agree?

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1 A. Yes, or it may be that there needs to be an additional
2 ground—assigned TFC deployed to undertake responsibility
3 or to assume responsibility for that different
4 geographical sector.
5 Q. But if the GATFC at the first scene had to move, they
6 would stop being the on—scene commander, wouldn't they?
7 A. Yes, because I would only anticipate that they would be
8 able to move if they had fulfilled the responsibilities
9 at that first scene and thereby neutralised any ongoing
10 threat so they are no longer required because you are
11 then moving into a consequence management phase.
12 Q. Exactly. That's why you have been so keen to stress
13 that the real issue here is the span of the command and
14 what the officer is focused upon doing as opposed to
15 a distinction between unarmed and armed assets?
16 A. Yes.
17 MR WOOD: Mr Thomas, thank you very much indeed for your
18 time. Sir, I've been longer than 15 minutes, but
19 I think I'm within the time we originally asked for. So
20 I'm sorry to have been longer than I said before lunch.
21 MR GREANEY: Mr Wood is certainly within the time he was
22 allocated initially.
23 Next, please, Mr Atkinson.
24 Questions from MR ATKINSON
25 MR ATKINSON: Good afternoon, Mr Thomas. As you understand,

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1 I ask questions on behalf of the bereaved families.
2 A. Yes.
3 Q. Could we, Mr Lopez, have on screen, {INQ008372/8}. This
4 is just to try and understand how the various different
5 acronyms with which today has been riven fit together:
6 "The Joint Operating Principles provide further
7 guidance on the key aspects of a rapid joint response
8 that are critical to saving life and ensuring the
9 protection of emergency service personnel."
10 So there in a sentence, would you agree, is an
11 understanding of how JOPs is meant to work?
12 A. Yes.
13 Q. It is guidance with the aim of saving life?
14 A. That's the primary aim, yes.
15 Q. In terms of what they are based on, the first of those
16 is JESIP?
17 A. Yes.
18 Q. And so even if someone had not been trained in JOPs,
19 given that JESIP had been around for some time even in
20 2017, the idea of co—location, communication and
21 coordination ought to have been ingrained into anyone in
22 a command role dealing with any kind of emergency?
23 A. In my opinion, yes, they are the bedrock of the JESIP
24 doctrine.
25 Q. What the JOPs seeks to do is to guide commanders through

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1 how to make that work?
2 A. In the context of, as it was in 2017, a marauding
3 terrorist firearms attack, yes.
4 Q. Although, as the guidance makes clear, it will also
5 inform them in dealing with how to deal with other forms
6 of terrorist incident or major incident, where they need
7 to work together?
8 A. Yes, it makes the point that some of the principles may
9 be applicable in another form of marauding terrorist
10 attack other than a firearms one.
11 Q. The second founding assumption is that those in command
12 roles will base their decisions on the joint decision
13 model?
14 A. Yes.
15 Q. And again is that a model that is broader than the
16 response to an MTFA, it's again very much part of JESIP
17 in terms of joint decisions as part of a joint decision
18 to an emergency?
19 A. It is, and as I've said previously in evidence, the JDM
20 sits alongside the single—service approach to that, the
21 NDM. I would expect that all commanders, and in fact
22 all operational police responders, to understand in
23 detail the NDM and the JDM because they use them on
24 a daily basis to inform their decision—making.
25 Q. Acting alongside JOPs in an MTFA context, as it was back

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1 in 2017, so far as the police are concerned, is the
2 contingency planning guidance for initial response to an
3 Operation Plato, version 1 of which was in operation
4 at the time?
5 A. Yes.
6 Q. So someone from the police perspective dealing with
7 an MTFA ought to have been familiar with that?
8 A. So operational commanders should have been familiar —
9 if they had a responsibility in respect of an MTFA,
10 should have been familiar with their local operational
11 plan, which should be informed by the national guidance,
12 because, as the national guidance makes clear in the
13 early part of it, it's intended as guidance to support
14 the development of those operational plans. I wouldn't
15 necessarily expect operational commanders to be familiar
16 with the national planning guidance document.
17 Q. What is the rationale for there being local Plato plans
18 rather than local forces using the guidance of the
19 national plan as the bedrock for those approach?
20 A. As we discussed earlier in the day, every policing
21 organisation across the country is slightly different,
22 so the purpose of having national guidance that forces
23 are to follow is that there is consistency of approach
24 because they are all expected to follow the approach of
25 the national guidance, but within the context of their

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1 own organisation and their own operating procedures. So
 2 it brings consistency but allows for that local
 3 flexibility so that it's absolutely fit for purpose
 4 within their operating environment.
 5 Q. Was there a similar expectation in relation to JOPs that
 6 each police area would similarly have joint operating
 7 plans for that area or would JOPs be the glue between
 8 the services wherever they were?
 9 A. Yes, I think the glue between the services is the right
 10 way to describe that. The JOPs — JESIP, the JOPs and
 11 the national Plato guidance in terms of police plans
 12 should, all three, be utilised to inform and bring
 13 consistency to that local plan.
 14 Q. So a local plan just for police or a local plan for all
 15 the services?
 16 A. There should be a local plan for the police, but that
 17 local plan should fit hand-in-glove with the other
 18 emergency services' local plans.
 19 Q. Does it follow that there would be an expectation that
 20 each of the services in a local area would know what the
 21 other services' local plans said?
 22 A. Insofar as how they drive joint operating, yes, because
 23 clearly there will be areas of responsibility that are
 24 relatively specific to the one organisation, be that the
 25 police, the Ambulance Service. But where they fuse

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1 together, you would expect that there has been that
 2 local joint consideration and deconfliction exercise.
 3 Q. Deconfliction, not a word I've come across before.
 4 Is the basic idea of that that what you want to
 5 happen in an emergency, where there is a limit to time
 6 to stand back and think, that the three services are
 7 starting out working to the same basic approach so they
 8 can join up with each other rather than finding they're
 9 all in different places doing different things?
 10 A. That's the purpose of the JOPs.
 11 Q. Going back to something that Mr Wood asked you a little
 12 earlier in terms of what those in command levels ought
 13 to have had effectively in their muscle memory, if the
 14 local plans for the services were both a proper
 15 application of JOPs and therefore of JESIP and
 16 deconflicted, then as long as they had a clear muscle
 17 memory of those, they would be a long way on the path to
 18 knowing what they were meant to be doing together?
 19 A. Yes.
 20 SIR JOHN SAUNDERS: Do you mind if I just interrupt for one
 21 moment?
 22 MR ATKINSON: Not at all.
 23 SIR JOHN SAUNDERS: One of the things which has to be done
 24 is a joint assessment of risk. It would be useful,
 25 wouldn't it, for all the services to get together to set

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1 out between them the principles that they are going to
 2 apply in that assessment and try and ensure that they
 3 are actually using the same principles and taking the
 4 same factors into account?
 5 A. That's the JDM, sir. So the purpose of the JDM is to
 6 drive that decision-making process.
 7 SIR JOHN SAUNDERS: That's in an individual decision, isn't
 8 it? I'm talking about if you're having to make an
 9 assessment of risk in an emergency situation, you don't
 10 want to be spending too long on it.
 11 A. No.
 12 SIR JOHN SAUNDERS: So you don't want to be starting from
 13 scratch?
 14 A. No.
 15 SIR JOHN SAUNDERS: So if you can agree the principles which
 16 you are going to take into account beforehand, that
 17 would seem to be quite useful?
 18 A. I think that is enabled through what the JOPs say and
 19 the way that the JDM is shaped. The purpose of the JDM
 20 is to ensure that when commanders from multiple agencies
 21 come together, their decision-making is done in the same
 22 fashion because they are all three using the various
 23 elements of the JDM which are designed to drive their
 24 decision-making. So they are the principles, the basic
 25 principles, both through application of the JDM and

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1 drawing upon the JOPs, that should enable those
 2 commanders to have an agreed joint start point.
 3 SIR JOHN SAUNDERS: Okay. I don't want to interrupt any
 4 more than is necessary, but the example I was going to
 5 say is let's suppose it is right that the
 6 Ambulance Service take the view that while there is
 7 a risk of unexploded devices they are not going to go
 8 into an area, whereas the police take the view,
 9 actually, we're not that concerned about that, we will
 10 go in, isn't that something that could be ironed out
 11 before rather than waiting for the occasion?
 12 A. I think as we touched on earlier today, if there is
 13 guidance in existence that defines that the emergency
 14 services should take a different approach at a base
 15 level to something such as the response to an explosive
 16 threat, then if it hasn't already, that needs to be
 17 dealt with and thrashed out.
 18 However, because every incident is different and
 19 will have a different dynamic to it, I would still come
 20 back to that the commanders need to join up and —
 21 SIR JOHN SAUNDERS: I'm not disputing any of that. I was
 22 just — where you can iron it out beforehand, iron them
 23 out beforehand?
 24 A. Yes.
 25 MR ATKINSON: Using the chairman's example, if you have

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1 a conversation between the services in advance of them
 2 actually dealing with a particular emergency,
 3 contemplating the possibility that they are going to
 4 have to respond together to a bomb, if the
 5 Ambulance Service explain their understanding, "We don't
 6 go in until we know there is no bomb", and the police
 7 are able to explain to them, "You have to understand the
 8 logistics in terms of getting bomb dogs in, how long
 9 that could take, what we do in the meantime is X and Y
 10 to check for a bomb, we can do those things very
 11 quickly, we think once you have done that you're okay",
 12 then everyone will understand what basis they are
 13 working on.
 14 A. Yes.
 15 Q. And you'd really want to be having that conversation
 16 over a cup of tea quietly rather than in the middle of
 17 a bomb incident?
 18 A. Yes, the same concept as with the marauding terrorist
 19 firearms attack principles: what can be worked on the
 20 ahead of the day of the race, so to speak, should be.
 21 Q. Another example of doing things ahead of the day of the
 22 race is, as the guidance at the time made clear, having
 23 specific plans for specific high-risk locations which
 24 are joint plans.
 25 A. Yes.

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1 Q. So that the services together know how they are going to
 2 respond if something, and they can delineate the kind of
 3 things, happens at a particular venue?
 4 A. Yes. In the context of an MTFA threat, I would expect
 5 that the police took the lead on the development of any
 6 venue-based contingency plan. But that I would expect
 7 would be done in partnership with Fire and Rescue and
 8 ambulance. There is -- certainly to kind of
 9 fast-forward to where we are today, there are
 10 arrangements to enable that using various aspects of
 11 technology to ensure there are shared plans for venues
 12 that will be available to commanders from all three
 13 services.
 14 Q. So it is a commendable thing for a particular emergency
 15 service to prepare a contingency plan for a high-risk
 16 venue on their plot; much more commendable if they share
 17 that plan with the other emergency services before they
 18 finalise it and then share it when it's finalised so
 19 they all know what they're working to?
 20 A. Yes, because that would be in line with the core JESIP
 21 principles across all types of emergencies.
 22 Q. Another thing important in that regard is to ensure,
 23 insofar as is possible, that anyone from any of the
 24 emergency services who might find themselves responding
 25 to, for example, an MTFA knows what they're meant to do

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1 when they're dealing with it?
 2 A. Yes.
 3 Q. Which will not just be armed police officers?
 4 A. No.
 5 Q. It would be unarmed police officers, indeed in the first
 6 instance in many cases it will almost inevitably be
 7 unarmed police officers, unarmed paramedics?
 8 A. Yes.
 9 Q. So it is perhaps concerning that Her Majesty's
 10 Inspectorate in 2020 was still identifying some forces
 11 where unarmed police were not as up to date on what they
 12 needed to know about an MTA as they should have been?
 13 A. Yes, I think Lucy D'Orsi in her letter used the phrase
 14 "disappointing". I would share that view.
 15 Q. Also essential, would you agree, that control rooms,
 16 particularly police control rooms, are absolutely clear
 17 on what needs to be done by who in the first minutes
 18 effectively of the response to an MTA?
 19 A. Yes, there should be processes and systems in place that
 20 have been appropriately trained and exercised that would
 21 allow that to happen.
 22 Q. So you need -- action cards is a good part of that?
 23 A. Yes.
 24 Q. But practice using action cards, better?
 25 A. Yes. I think as we discussed earlier, for the use of

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1 action cards to be effective, then the individuals need
 2 to know prior to the incident what their responsibility
 3 is going to be and understanding the context of that and
 4 how it fits into the bigger picture, and of course all
 5 that will be finessed through regular exercising.
 6 Q. And even better than that, would you agree, for the
 7 various different control rooms to know what the other
 8 control rooms will do in the situation, so for the
 9 ambulance control to know how they fit in to what the
 10 police are doing in response to an MTA, what their
 11 action cards say, and therefore what they're expected to
 12 do next?
 13 A. So far as that interoperability, interdependency is
 14 required through JESIP and JOPs, yes. But accepting
 15 that three separate services have their own kind of
 16 primary lead. But in terms of the elements of those
 17 plans that interrelate, yes, you would expect that to be
 18 done under the auspices of JESIP and JOPs.
 19 Q. Is one of the risks if a police control room doesn't
 20 have that kind of action card base, perhaps,
 21 interoperability in its mind that when they are dealing
 22 with a Plato incident they will focus on the larger part
 23 of the list that the guidance gives them, which is
 24 relating to deploying armed units, and not spend enough
 25 time thinking about the other bits which are the

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1 interoperable bits?
 2 A. So the arrangements that a force has in place need to
 3 enable them to discharge all of those responsibilities
 4 because many of them are equally important.
 5 Q. Would you agree that necessarily, this is not
 6 a criticism in itself, the initial response contingency
 7 planning guidance does devote most of its pages to the
 8 deploying of the various different types and locations
 9 of armed responders rather than unarmed responders?
 10 A. Yes, because we must remember that the guidance we are
 11 looking at from 2017 was specifically written to deal
 12 with a marauding terrorist firearms attack. As we've
 13 discussed earlier today, later iterations of the
 14 guidance are much broader and are designed to deal with
 15 a broader range of attack methodologies, so the more
 16 recent guidance will talk to a greater extent about the
 17 deployment of unarmed resources because the unarmed
 18 resources have a higher degree of success in terms of
 19 mitigating non-firearms threats. So the 2017 guidance
 20 must be looked at through that kind of lens.
 21 Q. So in terms of sitting in a control room and identifying
 22 what you need to do, if your focus was on the
 23 contingency planning for the initial response to Plato,
 24 there is a risk that your focus would be on getting your
 25 police and other armed responders in place and not

1 focusing enough on what you needed to be doing
 2 in relation to the ambulance or the fire services?
 3 A. No, I am not sure I would agree with that. Again, as
 4 I have been at pains to describe today, the single
 5 service Plato guidance must be read alongside the joint
 6 operating principles and the joint operating principles
 7 say a great deal about that joint approach between the
 8 emergency services and again, as I've said, both of
 9 those documents then need to be read alongside the core
 10 JESIP, which, at its very heart, is all about joint
 11 working.
 12 So I'm not sure it's accurate to say that the
 13 guidance in 2017 was purely focused on the deployment of
 14 armed officers; I think it was equally focused on that
 15 joint working.
 16 Q. My fault for the poor question. If you were in
 17 a control room and were focusing on the Operation Plato
 18 initial response contingency planning guidance, you
 19 would be focusing on getting armed responders into
 20 place. You had to also take account of JOPs to make
 21 sure you had the multi-agency response in place at the
 22 same time?
 23 A. Yes, apologies. I understand the question now, that was
 24 my mistake. So yes, but I would again make the point
 25 that what should be driving that activity in the control

1 room is the local plan that should be built upon both --
 2 not both -- JESIP, JOPs and the national police
 3 guidance, and in real terms what should be driving that
 4 activity in the control room are the action cards and
 5 there should be a good amount of the action card content
 6 that relates to that requirement for an effective
 7 tri-service response.
 8 So if the systems and processes, as I keep
 9 describing them, are effectively in place in the control
 10 room, then it should be driving the totality of the
 11 response, not just one element of it, ie the firearms
 12 response.
 13 Q. In the Operation Plato initial response plan at the
 14 time, version 1, there's a list of immediate actions.
 15 In the version that I'm using, which is {INQ016688/11},
 16 Mr Lopez, it's the lower half of the page, if you would.
 17 This is a series of immediate actions that a control
 18 room needs to take and therefore if all has gone
 19 according to plan and people have applied this guidance
 20 properly and they have their action cards in place,
 21 it would be a series of identified people within the
 22 control room doing particular things; if they haven't
 23 done that, the buck will stop with the FDO to make sure
 24 they are happening?
 25 A. Yes, if the guidance hasn't been followed in terms of

1 sharing that load across the team within the control
 2 room so that many of the actions can take place
 3 simultaneously.
 4 Q. So firstly, a decision to declare Plato at all. Then
 5 the initial actions to be taken applying in this context
 6 the national decision model. And then thirdly, the
 7 decisions to be taken in relation to unarmed response
 8 and what message needs to be got to them. Is it in the
 9 context of that that an ITFC would understand that he or
 10 she needs to be dealing with zones immediately,
 11 effectively?
 12 A. No, so I think the purpose of the guidance in terms of
 13 the initial unarmed response is being cognisant of the
 14 fact that it is possible, or indeed likely, that unarmed
 15 patrolling police officers are already either at the
 16 scene or in the immediate vicinity. So it's getting
 17 some very quick initial guidance out to those officers
 18 in terms of following the Stay Safe guidance so that
 19 they are able to be aware of what's taking place
 20 potentially around them and to be reminded that they
 21 should be following that Stay Safe guidance.
 22 Q. For that to work, don't they have to know where they are
 23 safe and where they are not?
 24 A. Yes.
 25 Q. Doesn't that mean making a first decision, not the

1 ultimate decision, but a first decision on zones?
 2 A. I don't think that that's operationally achievable.
 3 I think that in that first instance it's a very quick
 4 direction from the control room to get a message out to
 5 the operational police officers that may be in the
 6 immediate vicinity of what is taking place to tell them
 7 it's taking place, if they are not already aware of it,
 8 and to give them very quickly that advice around
 9 following the Stay Safe guidance. It's a very quick win
 10 in terms of maximising the safety of those officers that
 11 are already in and around it, not people that are being
 12 deployed to it, but people that are naturally in and
 13 around it.
 14 Q. So in terms of the guidance to an ITFC that a decision
 15 needs to be made on zones at an early stage, does that
 16 come from JOPs rather than this list of immediate
 17 actions in the Plato guidance?
 18 A. Because the zoning is seen as a tri-service activity,
 19 the guidance for that is drawn from the JOPs because, as
 20 I keep trying to emphasise, JESIP, the JOPs and the
 21 national Plato guidance need to be seen together.
 22 Q. Would you agree that it would be important in action
 23 cards or elsewhere for it to be made abundantly clear to
 24 an ITFC that they have to make a decision on zones as
 25 early as they have the information to do so?

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1 A. Yes. The information and the ability to do so, yes.
 2 Q. One advantage of if there was a joined-up multi-agency
 3 venue-specific plan for a location where the local force
 4 was not going to be the first people on scene, but
 5 another force was, BTP, that having built into that
 6 contact between the ITFC and those officers very
 7 early — an essential step to getting situational
 8 awareness very early?
 9 A. Yes, I would agree with that.
 10 Q. But then following through how JOPs is intended to work
 11 so far as zones are concerned, we can see that within
 12 JOPs it sets out that series of steps from 4.1 through
 13 identifying what needs to happen, and in normal
 14 circumstances, insofar as there ever are, the order in
 15 which they should happen?
 16 A. Sorry, are you referring to the JOPs?
 17 Q. The JOPs.
 18 A. The JOPs at section 4, yes.
 19 Q. So declaration of Plato, sharing the declaration of
 20 Plato, 4.2. Making clear that it is to be a police-led
 21 operation, 4.3. Three-way communication to be set up,
 22 4.4. Agreeing between the services an RVP, 4.5.
 23 Co-locating, 4.6. Involving any other forces like the
 24 BTP, 4.7. Getting an FCP set up, 4.8.
 25 So a series of practical steps to make sure that

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1 co-location, coordination and communication happens?
 2 A. Yes. That's the purpose of section 4 of the JOPs.
 3 Q. So that by the time that zones then come to be talked
 4 about, which is once the FCP has been set up, you have
 5 got the services talking to each other?
 6 A. Yes. The services should be talking to one another
 7 prior to the FCP being set up because they should be
 8 talking to each other through that tri-service control
 9 room to control room communication that appears at 4.2
 10 (overspeaking).
 11 Q. Sharing the declaration at 4.2, tri-service
 12 communication at 4.4, all of that should happen before
 13 anything more than a very preliminary decision about
 14 zones should happen?
 15 A. Yes, dependent on the prevailing circumstances.
 16 Q. So the services are talking to each other and can agree
 17 between themselves the limits of exploitation?
 18 A. Yes.
 19 Q. On the basis of the knowledge that they collectively
 20 have got from their people on the scene?
 21 A. Yes, shared situational awareness between all three
 22 emergency services.
 23 Q. So that, using your example of sentry positions, the
 24 police can explain that the unarmed — sorry, the armed
 25 officers who have gone in very quickly have secured

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1 a location and therefore for who it is safe to go and
 2 work there?
 3 A. Yes, in the circumstances where that was achievable you
 4 would very much do everything that the relevant guidance
 5 documents that we're talking about say, you would expect
 6 that information to be shared dynamically between the
 7 three organisations so they all have that shared
 8 situational awareness that JOPs talks about.
 9 Q. And equally so that if Ambulance Service, for example,
 10 start arriving on scene and want to know where they can
 11 go, where their specialists can go and where others can
 12 go, the mechanism is already in place for them to agree
 13 between them what the answer is?
 14 A. Yes, because there's that initial contact between the
 15 control rooms, so the setting-up of conference calls or
 16 radio channels, a Talk Group, an Airwave Talk Group,
 17 in that initial stage, and then the commanders
 18 physically co-locating together as physically as is
 19 practicable at the FCP.
 20 Q. So following the plans through properly, the police
 21 ought to initiate that process? In terms of from 4.3
 22 onwards, it's very much their lead. But all the
 23 services should know that if this is an emergency, these
 24 are the things that need to happen and if they haven't
 25 happened, who they ought to be speaking to to make sure

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1 they do?
 2 A. Yes, on the basis of the content of the JOPs.
 3 Q. And crucial to that process to have commanders on the
 4 ground talking to each other, ideally with each other,
 5 but if not with each other, in radio communication with
 6 each other, knowing what they're meant to be doing?
 7 A. Yes.
 8 Q. And doing it together?
 9 A. Yes, as soon as practicable.
 10 Q. In terms of the on-scene firearms commander and whether
 11 they should be controlling unarmed or not, does it
 12 really come down to that if there's an area that
 13 a firearms commander has responsibility for in terms of
 14 clearing it of risk, those within that area
 15 realistically are under their command? Those emergency
 16 responders in that area ought to be under their command
 17 or under a command strategy that they have set out?
 18 A. Yes. So the person responsible for command of
 19 a specific function or geographical area should have
 20 absolute clarity about what assets they have available
 21 to them to deliver that plan and those assets employed
 22 in that activity should have absolute clarity about who
 23 it is they are working to and what it is they are being
 24 asked to achieve.
 25 Q. And realistically, the strategy in any such situation

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1 where you have an incident, be it a bomb or other,
 2 is that there will be that area where that has happened,
 3 where you need to clear it of risk and then clear it of
 4 casualties?
 5 A. Yes.
 6 Q. And the whole process is designed to make that happen as
 7 quickly and effectively as possible?
 8 A. It is, yes.
 9 MR ATKINSON: Thank you very much.
 10 SIR JOHN SAUNDERS: Thank you very much.
 11 MR GREANEY: Thank you, Mr Atkinson.
 12 Mr Weatherby next, please.
 13 Questions from MR WEATHERBY
 14 MR WEATHERBY: Mr Thomas, can you see and hear me?
 15 A. Yes, I can, thank you, Mr Weatherby.
 16 Q. I just want to follow up what you've just been asked and
 17 just draw a couple of threads together and ask you one
 18 specific question about the ground-assigned TFC, so I'm
 19 not going to take very long at all.
 20 We've established that Plato is the descriptor for
 21 and the declaration a trigger for the multi-agency
 22 response to a marauding terrorist attack, haven't we?
 23 A. A marauding terrorist firearms attack as in 2017, yes.
 24 Q. Yes, indeed, or now -- yes, sure. That marauding
 25 firearms terrorist attack is defined as an ongoing

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1 lethal threat resulting from an active terrorist with
 2 a firearm at the time?
 3 A. Yes.
 4 Q. Am I right to characterise the response in three
 5 critical ways: first of all, measures to neutralise the
 6 threat? Secondly, communication to warn police officers
 7 and emergency responders about the threat so they don't
 8 rush into the arena of threat and can act to stop
 9 members of the public going into that part?
 10 A. Yes.
 11 Q. And thirdly, getting emergency responders to casualties
 12 as soon as safely possible to save lives?
 13 A. Yes.
 14 Q. So those are the three aspects: stopping the killing, if
 15 you like, warning of the immediate threat and
 16 facilitating assistance to casualties. Those are the
 17 three critical aspects of the duty to safeguard life
 18 that you have spoken about?
 19 A. Yes. The primary objective will be to save life and to
 20 minimise the risk to the public.
 21 Q. Yes. So broken down in those three ways is the critical
 22 three aspects. And then I'm sure there are other timing
 23 issues, but two of the key timing issues, am I right,
 24 are, first of all, that Plato should be declared as
 25 early as possible because the consequence of delay may

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1 be loss of life because of the nature of these attacks,
 2 whereas the consequence of a false alarm is simply
 3 inconvenience?
 4 A. Yes. The guidance encourages people to declare if they
 5 are in any doubt on the basis that they can rescind that
 6 declaration should it then be determined that that's not
 7 what they're actually being faced with.
 8 Q. Yes. The second key timing issue is that, once
 9 declared, the use of zoning or the review of zoning or
 10 the establishing of areas as safe or not safe is
 11 absolutely critical to the third aspect, getting
 12 emergency responders in to casualties as soon as
 13 possible; is that right?
 14 A. Yes, the use of zones is, I think as I described it
 15 earlier, a tool that the commanders can utilise to
 16 balance those potentially competing demands of
 17 minimising the risk to the public at the same time as
 18 maximising the safety of the people that they are
 19 deploying as part of the response.
 20 Q. Yes. So although the reviewing of Plato and the
 21 rescinding of Plato when the criteria had not been met
 22 is important, it's far more important to concentrate on
 23 whether it's safe to get emergency responders in to deal
 24 with casualties who may have life-threatening injuries?
 25 A. Sorry, could you just re-ask that question?

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1 Q. Yes, okay. I started by saying, first of all, that it's
 2 imperative that Plato, the multi-agency response, is
 3 triggered at the earliest possible moment so that all
 4 neutralisation and positive help is mobilised at the
 5 earliest possible juncture.

6 A. Yes.

7 Q. The second point I'm asking for your assistance on
 8 is that once Plato is triggered, put into motion, the
 9 second really key timing issue is to make sure that
 10 areas, particularly where there are casualties, are
 11 categorised, zoned, however we want to put it, so that
 12 the third safeguarding of life aspect, getting emergency
 13 responders to casualties with potentially
 14 life-threatening injuries, is dealt with with the
 15 absolute minimum of delay?

16 A. Yes. As I've said many times, the primary objective is
 17 to minimise the risk to the public and that includes
 18 those that are already injured. So every activity
 19 should be undertaken to enable that to take place as
 20 quickly as possible.

21 Q. Sure. Therefore it's essential that zones do not remain
 22 categorised as either hot or warm for any longer than is
 23 absolutely necessary; is that right?

24 A. Yes. The zones should be continually and dynamically
 25 reviewed because that will impact on the deployment of

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1 resources because that's what they're intended to
 2 achieve.

3 Q. And if they do remain in place for longer than
 4 necessary, then a policy designed to safeguard life can
 5 in fact do the opposite by impeding the relief effort
 6 for those that need help urgently?

7 A. Yes, it could.

8 Q. Okay. The second area, very quickly. You've been asked
 9 some questions about the ground-assigned TFC and there
 10 is only one point that I put to some other witnesses
 11 that I just want your help with.

12 If a ground-assigned TFC is commanding the
 13 forward-facing police actions alone, is there a problem
 14 that that person will have to monitor/use the firearms
 15 channel, the general unarmed policing channel, and
 16 potentially a tactical Talk Group channel, as well as
 17 communications on scene with others including other
 18 emergency service commanders?

19 A. Yes.

20 Q. Is there a problem with that -- yes.

21 And is the solution actually, therefore, to have
 22 a response where there is a ground-assigned TFC but also
 23 another police commander, probably an unarmed commander,
 24 working in tandem with them at the scene?

25 A. So yes, the capacity of an individual commander should

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1 always be continually assessed. And again, the
 2 authorised professional practice in respect of
 3 operations, generic operations, makes that point, that
 4 any command structure should take cognisance of the
 5 capacity of an individual commander, and if that
 6 capacity is likely to be outstripped then that is one of
 7 the reasons for further sub-dividing that area of
 8 command.

9 So if for whatever reason, a ground-assigned TFC is
 10 going to be overwhelmed then one would expect there
 11 would be a consideration around deploying a second
 12 ground-assigned TFC and for those two commanders to
 13 share responsibility, geographically or functionally,
 14 and a command protocol very quickly agreed between them
 15 so it's absolutely clear who is in command of what.

16 So yes, that is a consideration. Clearly, the
 17 practicality of that needs to be considered depending on
 18 the specific organisation's structure and the
 19 availability, the ready availability of other
 20 commanders, but it should be a consideration.

21 In terms of the monitoring of Talk Groups, then
 22 again the guidance talks about giving serious
 23 consideration to how the Airwave Talk Groups are set up
 24 and facilitated and talks about Airwave tactical advice
 25 being taken as part of that decision so that the use of

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1 that system is being optimised. The guidance also talks
 2 about consideration of deployment of support to the
 3 ground-assigned TFC where that may be required. One of
 4 the reasons for that may be the monitoring of multiple
 5 radio Talk Groups.

6 Q. It's very specifically, really, that that I'm asking you
 7 about. I get the rest of your answer. But there is an
 8 obvious problem here, isn't there, that if the
 9 ground-assigned TFC is in command of the forward-facing
 10 police actions that you've told us about then there is
 11 the obvious problem that they are juggling, at the very
 12 least, a firearms channel, an unarmed channel and
 13 a tactical Talk Group as well as what they're doing on
 14 the ground?

15 A. There are solutions to that. There are technical
 16 solutions so considerations can be given to moving
 17 people between different Talk Groups so that the use of
 18 the Talk Groups is being optimised, as I have already
 19 said.

20 Another option is to have support around the
 21 ground-assigned TFC so that multiple channels can be
 22 monitored and the ground-assigned TFC can have that
 23 information fed to them.

24 MR WEATHERBY: That is really what I was putting to you.
 25 I've done that, I'll leave it there. Thank you very

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1 much, Mr Thomas. Very helpful.
 2 SIR JOHN SAUNDERS: Thank you, Mr Weatherby.
 3 Further questions from MR GREANEY
 4 MR GREANEY: Thank you, Mr Weatherby. I'm going to check
 5 whether Mr Butt has any questions. (Pause). Thank you
 6 very much indeed.
 7 So I'm going to ask that we look very briefly at one
 8 final document. Mr Thomas, it's a document that you've
 9 referred to a couple of times and it's a letter of
 10 DAC D'Orsi, as she was. The INQ reference is
 11 {INQ039913/1}.
 12 I'm simply putting this on the screen because it may
 13 be relevant to a recommendation the chairman may wish to
 14 make. This is the letter of 15 December 2020 by which
 15 DAC D'Orsi distributed to all chief constables and Met
 16 commissioners the updated Plato guidance and updated
 17 JOPs along with some updated Stay Safe guidance; is that
 18 correct?
 19 A. Yes, that's right.
 20 Q. Is this the letter that you've referred to earlier in
 21 your evidence?
 22 A. Yes, it was the covering letter, but a publication of
 23 that December 2020 guidance.
 24 Q. Let's just look at one passage. There is a summary of
 25 the changes very similar to the summary you have given

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1 to us. I just want to look at one passage, page 3,
 2 please {INQ039913/3}. The bottom half of the page from
 3 "as you will be aware".
 4 I won't read it all out, but does this represent
 5 DAC D'Orsi expressing her disappointment, in common with
 6 the Inspectorate's disappointment, about the fact that
 7 some unarmed officers in some forces seemed still to be
 8 unaware of or not fully aware of what was to be expected
 9 of them in the event of a Plato situation?
 10 A. Yes.
 11 Q. And asking that her colleagues take steps to ensure that
 12 that was put right?
 13 A. She was, yes.
 14 MR GREANEY: Thank you very much. That can be taken from
 15 the screen, Mr Lopez.
 16 Sir, those are all of the questions that I have for
 17 Mr Thomas at this stage. Do you have any further
 18 questions for him?
 19 SIR JOHN SAUNDERS: Just one very briefly. You may have
 20 appreciated that comments from the Fire Service and the
 21 Ambulance Service within Greater Manchester have said,
 22 particularly in relation to training, that the police
 23 emphasis on the training has tended to be on the
 24 firearms officers and really the impression given to
 25 some other people was that once that bit was done, the

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1 police weren't really very interested in what went
 2 thereafter. So the concentration was on the firearms.
 3 I think it's fair to say that, actually, during this
 4 incident taking place in May 2017, there have been very
 5 few, if any, criticisms of the way the firearms officers
 6 operated.
 7 Do you think the way the guidance is actually
 8 drafted, taking the totality of the guidance into
 9 account, may have contributed to that, the emphasis on
 10 the firearms rather than everybody else?
 11 A. From my perspective, sir, no, I don't, but I accept that
 12 other people may view that differently. But from my
 13 perspective, I don't. Part of the basis for that view
 14 is the layering of the guidance that I've mentioned
 15 a number of times today about JESIP, JOPs and the Plato
 16 guidance and the other supporting command guidance and
 17 doctrine being taken in the round. I think that it was
 18 certainly always intended that a tri-service response
 19 would be front and centre of any response to a marauding
 20 terrorist firearms attack.
 21 SIR JOHN SAUNDERS: That presupposes, of course, the
 22 criticism is correct, that that was GMP's attitude,
 23 which obviously will need to be looked at. But are you
 24 aware or have you heard that criticism generally or is
 25 it something that's really never been fed back to you?

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1 A. No, that's not my experience. My experience across the
 2 country is that there is very good joint exercising
 3 between the three emergency services. That's my
 4 experience. I can't comment on evidence that you've
 5 heard in respect of Greater Manchester, I'm afraid.
 6 SIR JOHN SAUNDERS: Just one further matter and then
 7 I really will stop. The question has been asked and the
 8 suggestion perhaps made that the emphasis at the
 9 particular time in May 2017 of the risk of a marauding
 10 terrorist firearms attack led to an overemphasis by
 11 those responding to the May attack on it being that sort
 12 of attack rather than what it actually was, which was
 13 a single person.
 14 A. I understand that, but I think it's got to be viewed in
 15 the context of that period. As we know, there had only
 16 been the one previous terrorist attack during the
 17 relevant period in the UK, and that was the
 18 Westminster Bridge attack. So a lot of the context was
 19 being drawn from what we'd seen globally and within
 20 Europe, and what we had seen globally and within Europe,
 21 and very close to home, in Paris, was an MTFA.
 22 All the information, shall I say, at that stage
 23 indicated that that was the situation which we should be
 24 planning for. Clearly, as I've stated during my
 25 evidence today, time has moved on. Assessments have

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1 moved on. So that's why we now have guidance that is
 2 designed specifically to deal with a wide array of
 3 attacks. But in the context of 2017, I think it's
 4 understandable that the guidance was designed in the way
 5 that it was.
 6 SIR JOHN SAUNDERS: Thank you.
 7 MR GREANEY: Sir, thank you very much. The next phase will
 8 be to move into a restricted session, during the course
 9 of which we will look at the current guidance and JOPs
 10 more closely. It will have to be in a restricted
 11 session for reasons that I explained earlier today.
 12 We will need also before we start that session to have,
 13 I'm afraid, a break for technical reasons.
 14 Before we take that break, may I indicate that
 15 we will be in restricted session pursuant to an order
 16 that you made today. The relevant parts of that order,
 17 which will be available on the website imminently and
 18 has been emailed to core participants, are as follows.
 19 There shall be no publicly available live stream,
 20 whether delayed or otherwise, of the restricted hearing.
 21 There shall be no reporting or publication of that
 22 hearing unless, sir, authorised by you. The transcript
 23 of that hearing will not be made available on the
 24 inquiry's website, again, sir, unless authorised by you.
 25 That order was made, as I indicated, today and will

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1 remain in force indefinitely subject to your power,
 2 of course, to vary or revoke the order.
 3 SIR JOHN SAUNDERS: I anticipate the restricted hearing will
 4 take the rest of today.
 5 MR GREANEY: It will, yes.
 6 SIR JOHN SAUNDERS: I hope that it can be finished within
 7 today.
 8 MR GREANEY: I believe we should be able to finish the
 9 hearing today, although it may require us to sit beyond
 10 5 o'clock. I have already drawn that to the attention
 11 of the court staff, but in the break I will check to see
 12 whether there are any reasons that make that impossible.
 13 SIR JOHN SAUNDERS: I know they are long days and this is
 14 a long day, but the whole thing has been pretty
 15 carefully timed out. Thank you. Will we need to go
 16 back into open session before I close?
 17 MR GREANEY: I was just about to say that I don't propose
 18 that we should return to an open session once the
 19 restricted session has concluded, so it may be helpful
 20 if I indicate that we will, once we've finished today,
 21 restart tomorrow morning at 9.30 am, when my expectation
 22 is that the fire experts will be called by
 23 Mr de la Poer.
 24 SIR JOHN SAUNDERS: Okay, thank you.
 25 (3.32 pm)

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1 (A short break)
 2 (3.54 pm)
 3 (The inquiry sat in a restricted session)
 4 (5.41 pm)
 5 (The inquiry adjourned until 9.30 am
 6 on Wednesday, 8 September 2021)

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