

# OPUS2

Manchester Arena Inquiry

Day 146

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Opus 2 - Official Court Reporters

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Wednesday, 15 September 2021

(11.00 am)

(Delay in proceedings)

(11.34 am)

MR GREANEY: Good morning, sir.

SIR JOHN SAUNDERS: Good morning. Let me apologise to everyone for keeping you waiting. It's for my benefit that it has happened. I think you would say it's for a good reason and I hope everyone would think that too. I do apologise and I hope that people have not been inconvenienced too much.

MR GREANEY: Sir, I am sure everyone would agree it was for a good reason and in any event I'm confident with the cooperation of all core participants we will finish this evidence by the end of the week.

We are turning next, as everyone knows, to deal with the experts who address the policing response to the arena attack and we're going to hear from Mr Scott Wilson, who is the gentleman in the witness box, Mr Iain Sirrell, who, sir, is to your right on the front bench, and Mr Ian Dickinson who is to your left and wearing the red tie. I'm going to ask, please, if they could each be sworn in turn.

MR SCOTT WILSON (sworn)

1

MR IAIN SIRRELL (sworn)

MR IAN DICKINSON (sworn)

Questions from MR GREANEY

MR GREANEY: So would you please identify yourselves in turn. First of all, Mr Wilson.

SCOTT WILSON: It's Scott (inaudible) Wilson.

Q. Then Mr Sirrell.

IAIN SIRRELL: Iain Sirrell.

Q. And Mr Dickinson.

IAN DICKINSON: Ian Dickinson.

Q. I'm going to deal, gentlemen, first of all, with a summary of your qualifications and experience.

First of all, Scott Wilson, were you a detective chief superintendent in the Metropolitan Police at the time of your retirement?

SCOTT WILSON: I was, yes.

Q. When was it that you retired?

SCOTT WILSON: I retired in July 2018.

Q. Were you a detective superintendent in counter-terrorism command between 2008 and 2010?

SCOTT WILSON: I was.

Q. Were you the detective head of emergency planning and business continuity for emergency services for the London Olympics in 2012?

SCOTT WILSON: That was overall for the Metropolitan Police,

2

which included doing the Olympics in 2012.

Q. That was a job you did, I believe, between 2010 and 2012?

SCOTT WILSON: On promotion to detective chief superintendent.

Q. Did you head the intelligence bureau of the Metropolitan Police between 2013 and 2014?

SCOTT WILSON: I did, yes.

Q. And between 2014 and your retirement in 2018, were you the national coordinator for Protect and Prepare?

SCOTT WILSON: That's correct, yes.

Q. In that role did you have strategic oversight of the National Counter-terrorism Security Office?

SCOTT WILSON: That's correct, yes.

Q. Leading the policing response to high-risk threats among other things?

SCOTT WILSON: That's correct, yes.

Q. Did you work domestically and internationally?

SCOTT WILSON: Yes, we set up an international team in 2015 after the attacks in Tunisia.

Q. Did you conduct a full review of police firearms capability and capacity, command and control, collaborative working, protective security and communications strategy?

SCOTT WILSON: That's correct. Richard Thomas and his team

3

worked under me on that strand.

Q. And Richard Thomas, of course, a witness from whom we have heard twice, including last week?

SCOTT WILSON: That's correct.

Q. Did you develop the national police counter-terrorism capability and capacity?

SCOTT WILSON: Yes.

Q. Did you develop the national counter-terrorism awareness?

SCOTT WILSON: Yes, that was the CT awareness campaigns we ran from 2014 all the way through to 2018 on my retirement.

Q. Did your role between 2014 and 2018 involve also operating as the strategic lead for Operation Temperer?

SCOTT WILSON: That's correct.

Q. An operation we did hear about at a much earlier stage, but as it publicly avowed, is that an operation which involves the deployment of military assets on to our streets in the event of a terrorist attack?

SCOTT WILSON: That's correct.

Q. Finally in relation to 2014 to 2018, were you responsible for the management of CT exercising?

SCOTT WILSON: Yes, in connection with the ODU. So you've heard from the ODU, the Organisational Development Unit. I had a unit within my command which had done exercising

4

1 linking into the ODU. When I then retired, the ODU then  
 2 fell completely under the national (inaudible) of the  
 3 Temperer remit. It was a joint piece when I was in  
 4 command.  
 5 Q. Were you in post during the London Bridge attack of  
 6 2017?  
 7 SCOTT WILSON: I was, and I was called out as the senior  
 8 identification manager.  
 9 Q. Indeed much earlier, 10 years earlier in 2007, were you  
 10 the senior investigating officer for the Glasgow Airport  
 11 attack?  
 12 SCOTT WILSON: Yes — not when the attack took place.  
 13 I then took over the team who took the case to court,  
 14 sir.  
 15 Q. In the course of your police career, did you receive  
 16 many commendations?  
 17 SCOTT WILSON: I was commended 16 times.  
 18 Q. And were you one of the authors of Joint Operating  
 19 Principles edition 3?  
 20 SCOTT WILSON: Yes.  
 21 Q. Next, Mr Iain Sirrell, please. Did you have various  
 22 roles in policing between 1998 and 2018?  
 23 IAIN SIRRELL: I did, yes.  
 24 Q. First in the Metropolitan Police and then in North  
 25 Yorkshire Police?

5

1 IAIN SIRRELL: I joined the Metropolitan Police in 1988 and  
 2 North Yorkshire Police in 1992 —  
 3 SIR JOHN SAUNDERS: Can people at the back hear?  
 4 (Pause)  
 5 MR GREANEY: Mr Sirrell was explaining he joined the  
 6 Metropolitan Police in 1998. He then transferred to  
 7 North Yorkshire Police in, I think you said, 1992.  
 8 IAIN SIRRELL: Just to correct you, I joined in 1988  
 9 transferred to North Yorkshire Police in 1992.  
 10 Q. Were you the Police Training College manager between  
 11 2006 and 2008?  
 12 IAIN SIRRELL: That's correct.  
 13 Q. Were you the North Yorkshire Police force control room  
 14 manager and Silver commander between 2013 and 2016?  
 15 IAIN SIRRELL: Yes, sir. I was one of a number of force  
 16 incident managers, having previously done the role in  
 17 2008 to 2010 as well.  
 18 Q. During that period did you make major changes to the  
 19 approach of the control room?  
 20 IAIN SIRRELL: I did, yes, in terms of the counter—terrorism  
 21 response.  
 22 Q. Did you concurrently have responsibility for the command  
 23 and control in a national counter—terrorism programme  
 24 for police and military exercises?  
 25 IAIN SIRRELL: That's correct, yes, working with the

6

1 Organisational Development Unit, the ODU, that Mr Wilson  
 2 just spoke of.  
 3 Q. And have you been the counter—terrorism security  
 4 coordinator for many planned events?  
 5 IAIN SIRRELL: No, sir. I was an occupationally accredited  
 6 CT SECO, but never operationally. Because of my work  
 7 overseas it was never operationalised.  
 8 Q. Thank you very much.  
 9 Mr Dickinson, finally on this issue, please, have  
 10 you had a long career in policing?  
 11 IAN DICKINSON: Yes, sir.  
 12 Q. Did that career as an operational police officer  
 13 conclude with you in the rank of deputy chief constable  
 14 in Lothian and Borders Police?  
 15 IAN DICKINSON: Not strictly accurate, sir. I was the  
 16 deputy chief constable for a period and then I reverted  
 17 to assistant chief constable at my request before my  
 18 retirement.  
 19 Q. At all events, you had a command role within that force?  
 20 IAN DICKINSON: Yes, sir.  
 21 Q. Do you have experience of strategic command?  
 22 IAN DICKINSON: Yes, sir.  
 23 Q. Were you in post on the occasion of the Glasgow attack  
 24 in 2007?  
 25 IAN DICKINSON: Yes, I was an assistant chief constable in

7

1 Lothian and Borders Police, Edinburgh, and I was also  
 2 the deputy national coordinator of Scotland for  
 3 counter—terrorism.  
 4 Q. One thing not connected with your experience, I think,  
 5 you would like to know is that the chairman is not the  
 6 only person with a bad back and you have a bad back —  
 7 IAN DICKINSON: That's true.  
 8 Q. — and that it may be necessary for you to walk around  
 9 the room from time to time?  
 10 SIR JOHN SAUNDERS: We'll walk around together.  
 11 MR GREANEY: Do all three of you work with the Emergency  
 12 Planning College?  
 13 THE WITNESSES: Yes, we do.  
 14 Q. Mr Wilson, could you just explain to us in a few  
 15 sentences what the Emergency Planning College is please?  
 16 SCOTT WILSON: It's the centre for resilience within the UK  
 17 it's run by a Cabinet Office, under the secretariat of  
 18 the Cabinet Office for training and doctrine. So we  
 19 deliver courses in the UK, mostly to local authorities  
 20 and emergency services, from an operational and tactical  
 21 and strategic level and we also work in about  
 22 26 countries worldwide delivering training.  
 23 Q. Again I will direct the next series of questions through  
 24 Mr Wilson. Have the three of you produced a number of  
 25 reports?

8

1 SCOTT WILSON: Yes.  
 2 Q. First of all, did you produce an overview report in  
 3 July 2019?  
 4 SCOTT WILSON: We did, yes.  
 5 Q. Did you produce a report commenting more specifically on  
 6 the emergency response to the arena attack in August of  
 7 last year?  
 8 SCOTT WILSON: We did, sir, yes.  
 9 Q. Did you participate with the other emergency service  
 10 experts in the preparation of a capping report?  
 11 SCOTT WILSON: We did, sir, yes.  
 12 Q. And more recently have you produced a response, running  
 13 to 50 pages, to a set of issues?  
 14 SCOTT WILSON: We did, sir, yes.  
 15 Q. So can I indicate through you to all core participants  
 16 and the public that we intend to publish on our website  
 17 the overview report of the experts and also their  
 18 response to the issues, so the most recent document.  
 19 Mr Wilson, your instructions are set out in your  
 20 reports, and in particular I think annex A to your first  
 21 report, but in simple terms were you instructed to,  
 22 first, provide an overview of the system for emergency  
 23 response?  
 24 SCOTT WILSON: We were, sir, yes.  
 25 Q. Second, to provide your comments on the preparation for

9

1 an attack of Greater Manchester Police, British  
 2 Transport Police and the Greater Manchester Resilience  
 3 Forum?  
 4 SCOTT WILSON: That's correct, sir, yes.  
 5 Q. And thirdly, to provide your comments on the response on  
 6 the night of Greater Manchester Police and British  
 7 Transport Police?  
 8 SCOTT WILSON: Correct, yes.  
 9 Q. Before we get into the substance of your views, let me  
 10 set some ground rules. Your reports in total run to  
 11 over 900 pages, do they not?  
 12 SCOTT WILSON: They do.  
 13 Q. Not far short of 1,000 pages in fact. Moreover, are  
 14 those reports based upon certainly tens of thousands of  
 15 pages that you have received and read?  
 16 SCOTT WILSON: Yes.  
 17 Q. As you will appreciate I'm not going to deal with every  
 18 page of your reports, but instead I'm going to deal with  
 19 the big issues that appear to me at least to have arisen  
 20 in the course much the evidence. Does that seem  
 21 a sensible approach?  
 22 SCOTT WILSON: It does, yes.  
 23 Q. There are three of you, in effect, in the witness box.  
 24 What I intend to do is to go to the one of you best  
 25 placed, so it seems to me, to deal with a particular

10

1 topic and once I've invited that person to deal with  
 2 that topic, I'll invite confirmation or otherwise from  
 3 the other two. Again, does that seem like a sensible  
 4 approach?  
 5 SCOTT WILSON: Yes.  
 6 Q. What we would invite other core participants to do  
 7 is that where, for example, I've identified you as the  
 8 person to deal with ACC Ford, for example, they should  
 9 do likewise.  
 10 Given the time available, we're going to have to  
 11 deal with this as efficiently as possible. I'm going to  
 12 begin by dealing with the resilience forum and GMP and  
 13 then we will deal tomorrow, I fear, with British  
 14 Transport Police. Again, does that make sense as an  
 15 approach?  
 16 SCOTT WILSON: It does, yes.  
 17 Q. Finally, you have been good enough to explain to me that  
 18 each of you has a set of your notes with you in the  
 19 witness box; is that correct?  
 20 SCOTT WILSON: That's correct.  
 21 Q. These are notes to which each of you have made  
 22 a contribution. They're your joint notes in effect;  
 23 is that correct?  
 24 SCOTT WILSON: Yes.  
 25 Q. Each of you also has a copy of the reports that you have

11

1 prepared?  
 2 SCOTT WILSON: We do.  
 3 Q. So let's make a start. First topic, JESIP. Mr Wilson,  
 4 these questions are directed in the first instance  
 5 towards you.  
 6 On 6 May 2011, Lady Justice Hallett reached her  
 7 conclusions and made her recommendations following on  
 8 from the inquests into those who died in the terrorist  
 9 attacks of 7/7.  
 10 SCOTT WILSON: That's correct, yes.  
 11 Q. Those recommendations led, am I right, to a change in,  
 12 among other things, joint working and communications?  
 13 SCOTT WILSON: Yes, it brought about the JESIP programme, as  
 14 it was first called, in 2012. The government at that  
 15 time were quite keen to get this out before the  
 16 Olympic Games.  
 17 Q. So a driver for JESIP, indeed the driver, was the  
 18 outcome of the inquest into 7/7?  
 19 SCOTT WILSON: It was. Together with the Pitt Report from  
 20 the 2007 flooding and Hillsborough. There was other  
 21 pieces to it but the main driver was the 7/7 public  
 22 inquiry.  
 23 Q. The principles of JESIP can be simply stated: one,  
 24 co-locate?  
 25 SCOTT WILSON: That's correct.

12

1 Q. Two, communicate?  
 2 SCOTT WILSON: That's correct, yes.  
 3 Q. Three, coordinate. Four, jointly understand risk?  
 4 SCOTT WILSON: That's correct.  
 5 Q. And five, shared situational awareness?  
 6 SCOTT WILSON: Yes. If I could add, those were the  
 7 principles that were then adopted in 2014. Between  
 8 2012 — it was a programme which was loosely tied around  
 9 them, so they then became the five principles in 2014,  
 10 when it was republished in 2014.  
 11 Q. The aim is that in the event of, really, any major  
 12 incident the three emergency services should work  
 13 together?  
 14 SCOTT WILSON: That's correct, yes.  
 15 Q. And there should be a joined-up approach between the  
 16 three of them?  
 17 SCOTT WILSON: Most definitely.  
 18 Q. We'll all understand why that is important.  
 19 No one, as you all three will appreciate, has said  
 20 or could rationally say that JESIP worked on  
 21 22 May 2017.  
 22 SCOTT WILSON: Unfortunately, it didn't.  
 23 Q. Do you agree that the emergency services did not fulfil  
 24 in any meaningful way any of five principles of JESIP at  
 25 a command level?

13

1 SCOTT WILSON: Within the City Room itself between  
 2 Inspector Smith and the Ambulance Service, there was  
 3 a small piece of JESIP working, but overall, it didn't  
 4 work at all.  
 5 Q. And do you agree that even within some of the individual  
 6 services, they did not apply the principles of  
 7 coordination?  
 8 SCOTT WILSON: That's correct, yes.  
 9 Q. 22 May, do you also agree, is not the only occasion upon  
 10 which JESIP failed?  
 11 SCOTT WILSON: That's also correct. It failed at many  
 12 exercises before that.  
 13 Q. Indeed in many exercises it has failed. So the very  
 14 first question that I'm going to ask you to help the  
 15 chairman with is whether JESIP is fit for purpose.  
 16 SCOTT WILSON: I think JESIP as doctrine in its own right —  
 17 I actually sat on the JESIP National Board as the CT  
 18 link between 2014 and 2018 and I think those principles  
 19 stand today. If you went back to a drawing board  
 20 I think you'd probably come up with the same sort of  
 21 principles to come together, to talk together, to  
 22 coordinate your actions, to look at risk, and to speak  
 23 together. So I don't think there's anything broken with  
 24 JESIP: it's how it's embedded on the ground when an  
 25 incident takes place. In the early hours of that

14

1 incident, within what we call the golden hour, how you  
 2 can actually get it to work then is much more difficult.  
 3 Q. As a starting point, your starting point, and I'd invite  
 4 the others to agree or disagree in a moment, is that  
 5 JESIP has always been and remains fit for purpose?  
 6 SCOTT WILSON: I certainly think so, yes.  
 7 Q. Bearing in mind it didn't work on 22 May and has not  
 8 worked on other occasions, the next question is how we  
 9 ensure that in the future it does work?  
 10 SCOTT WILSON: I think we need to make sure it's embedded.  
 11 As I say, we got evidence from GMP that JESIP was  
 12 trained, wasn't significant within the planning, when  
 13 they were carrying out exercises it did feature in  
 14 exercises, but we don't feel it was fully embedded  
 15 either within Greater Manchester Police or BTP — and it  
 16 is that embedding, so you live and breathe it, and it  
 17 becomes that sort of mental piece when you turn up at  
 18 a scene that JESIP principles are the principles  
 19 you have to adhere to — muscle memory is the piece I'm  
 20 looking for there.  
 21 SIR JOHN SAUNDERS: I can understand that and I have heard  
 22 that before. I just wonder whether — do you think  
 23 there is resistance among the police officers, because  
 24 that's what you're talking about, on the ground to  
 25 actually put JESIP in operation because they just think

15

1 it doesn't actually work and it's just a lot of talk?  
 2 SCOTT WILSON: I don't think so at all, sir. I think on  
 3 a day to day basis, for incidents that will be  
 4 happening, whether it is Manchester, Birmingham, London,  
 5 car traffic accidents, officers will come together from  
 6 the other two emergency services, they will co-locate,  
 7 coordinate, talk and do that — I sometimes think that  
 8 when a big case like this comes together and when  
 9 there's a terrorist case and Plato — whether it  
 10 frightens people out of what they should be doing:  
 11 should it be Plato guidance, should it be JESIP?  
 12 I think that is probably the issue.  
 13 I have made the issue (sic) many times that if this  
 14 had been an explosion at the arena, but not a terrorist  
 15 attack, I think the actual response would have been much  
 16 different, I really do. I think it is putting that  
 17 Plato/terrorism label on to it — it makes it more  
 18 confusing in some ways for officers who do not live and  
 19 breathe that.  
 20 SIR JOHN SAUNDERS: One more question and then I'll stop: is  
 21 this the first time after 7/7 that JESIP has been tested  
 22 in a large-scale incident?  
 23 SCOTT WILSON: It would have been tested at London Bridge —  
 24 sorry, at the Westminster attack and then the London  
 25 Bridge attack and to a certain extent it was tested

16

1 in the case of the killing of Lee Rigby because again  
 2 there was ambulance and police on scene there. I have  
 3 done some training on that piece and the approach to  
 4 that piece and it was definitely tested there and worked  
 5 quite well there.  
 6 SIR JOHN SAUNDERS: And London Bridge and Westminster, just  
 7 in a word, did it work well or not?  
 8 SCOTT WILSON: As far as I can see it worked well on both of  
 9 them. I wasn't part of the inquest, although I was on  
 10 scene at London Bridge, but I could see that the  
 11 emergency services got there very quickly, they worked  
 12 closely together.  
 13 And if you look at London Bridge a lot of people  
 14 were taken to hospital and there was a lot (inaudible)  
 15 later to say that the injuries they received, if they  
 16 hadn't been taken to hospital as quickly as they had  
 17 done, a lot more people may have died at London Bridge.  
 18 SIR JOHN SAUNDERS: We'll obviously need to look at the  
 19 reports and the inquest to see what the conclusions were  
 20 by the coroner.  
 21 MR GREANEY: We certainly do. You must tell me if I'm wrong  
 22 in suggesting this and what I suggest is not meant in  
 23 any way to diminish the importance of those incidents  
 24 you have just spoken about or the terrible nature of  
 25 them, but would it be fair to say that each of those

17

1 incidents was on a smaller scale than the Manchester  
 2 Arena attack?  
 3 SCOTT WILSON: It was most certainly, yes.  
 4 Q. So the Manchester Arena attack was really the first  
 5 occasion upon which JESIP was tested on that scale?  
 6 SCOTT WILSON: Without a doubt. Without a doubt.  
 7 Q. The idea that one needs to embed JESIP in all officers,  
 8 from the rank and file officers up to command, is, if  
 9 I may say so, obvious. But how do we achieve it?  
 10 SCOTT WILSON: Really, within a force you probably need  
 11 a JESIP champion and certainly, in a case the size of  
 12 this, whoever is your tactical commander and your  
 13 operational commander at the scene who are taking  
 14 charge, they need to be living and breathing JESIP.  
 15 They need to know that that is their — their purpose  
 16 when they get there is to make sure those JESIP  
 17 principles are adhered to. So hopefully all officers  
 18 will be thinking JESIP but you need someone who is going  
 19 to embed it on the scene and I would say that falls to  
 20 both to the operational commander and the tactical  
 21 commander.  
 22 Q. So what needs to be done differently from that which is  
 23 done at the moment or in addition to that which is done  
 24 at the moment in order to achieve what is obviously  
 25 necessary?

18

1 SCOTT WILSON: Well, if we look — as I said before, if we  
 2 look within the City Room, when we've got — we've got  
 3 Inspector Smith speaking to BTP, they've co-located,  
 4 there's a little bit of cooperation to get casualties  
 5 removed, the JESIP principles in some ways are working  
 6 within that scene. What we did need on that night was  
 7 a tactical commander to be there to get a grip and then  
 8 make sure that the JESIP principles were embedded within  
 9 the larger scale rather than just within the City Room.  
 10 And if that had happened — we put that as one of our  
 11 main failure — if that had actually happened on the  
 12 night, I think JESIP would have worked much better.  
 13 SIR JOHN SAUNDERS: They arrived on the scene because they  
 14 all went to deal with casualties, so they're not having  
 15 to co-locate/coordinate deliberately, as it were: they  
 16 just all come together because that's where they're  
 17 going, to the incident. That what's they do on an  
 18 ordinary daily basis, as you were talking about, when  
 19 they go to any sort of big car crash or anything.  
 20 SCOTT WILSON: Yes.  
 21 SIR JOHN SAUNDERS: So that's why you need the person who's  
 22 standing back from being at the scene who needs to be  
 23 more alert to (overspeaking) —  
 24 SCOTT WILSON: At the RVP and then the FCP, making sure  
 25 they're driving the whole incident with JESIP principles

19

1 in mind, rather than within the actual scene of the main  
 2 incident.  
 3 MR GREANEY: So we are jumping ahead to an issue we'll need  
 4 to look at closely, but your view in terms of what went  
 5 wrong on the night was that if a tactical commander from  
 6 GMP had been present at the scene, that would have  
 7 promoted JESIP?  
 8 SCOTT WILSON: I think it would have made a huge difference.  
 9 If that person was aware of the JESIP principles, aware  
 10 of what their responsibilities were on the night, they  
 11 would have brought the commanders together, they would  
 12 have spoken together, and they would have went through  
 13 the five principles of JESIP.  
 14 Q. So we're going to obviously come on to that. Your view  
 15 therefore is a very clear one: JESIP is fit for  
 16 purpose —  
 17 SCOTT WILSON: Yes.  
 18 Q. — but more needs to be done to embed it?  
 19 Can I just ask you to reflect on one issue and tell  
 20 me whether you think there is anything in it: JESIP is  
 21 five principles that officers are expected to apply in  
 22 what necessarily will be extremely difficult  
 23 circumstances. Is there anything to be said for  
 24 abandoning those five principles and just having one  
 25 principle, at least as a starting point, that principle

20

1 being to work together?  
 2 SCOTT WILSON: The full piece of our (inaudible) is working  
 3 together, saving lives. I still think -- if you were to  
 4 go back to the drawing, board I don't think you would  
 5 change those principles. You need co-location, you need  
 6 communication, you need some sort of coordination. So  
 7 I still feel that you could word them in different way  
 8 but the actual outcome is going to be the same: that's  
 9 what you need.  
 10 SIR JOHN SAUNDERS: And having been an author of it, you  
 11 don't feel you're over-attached to it?  
 12 SCOTT WILSON: I wasn't actually an author of JESIP, it was  
 13 JOPs 3. As I say, I sat on the national JESIP board as  
 14 the CT link. I was never an author of JESIP. It was  
 15 JOPs 3 I was the signatory to.  
 16 MR GREANEY: Just before we move this issue on slightly, I'm  
 17 going to remind you of something that is stated in your  
 18 second report. This is at page 335 of the report,  
 19 {INQ035309/338}.  
 20 You said in relation to GMP:  
 21 "There was a disconnected and fragmented estate..."  
 22 SCOTT WILSON: Yes.  
 23 Q. "... reducing the opportunity to co-locate."  
 24 SCOTT WILSON: Yes.  
 25 Q. "There was no apparent cohesive and coordinated

21

1 response."  
 2 SCOTT WILSON: That's correct.  
 3 Q. "A breakdown in communication between the different  
 4 commands."  
 5 SCOTT WILSON: That's correct, yes.  
 6 Q. "Resulting in a lack of direct command and operational  
 7 confusion."  
 8 SCOTT WILSON: That's correct, yes.  
 9 Q. "There was a lack of awareness about what was happening  
 10 and what had happened."  
 11 SCOTT WILSON: Yes. Definitely.  
 12 Q. "And consequently, there was no clear organisational  
 13 assessment of the risks."  
 14 SCOTT WILSON: That's correct.  
 15 Q. "There was no internal JESIP. Not only was each  
 16 organisation operating independently of each other, GMP  
 17 was itself operating internally in a silo."  
 18 SCOTT WILSON: That's correct.  
 19 Q. And taking all of that together, does that represent, in  
 20 your view, a significant failure in response by Greater  
 21 Manchester Police?  
 22 SCOTT WILSON: It does, yes.  
 23 Q. But important to observe that that failure is not  
 24 isolated to them but extends to other emergency services  
 25 as well?

22

1 SCOTT WILSON: That is also correct.  
 2 Q. We have understood -- before we move on, can I ask  
 3 Mr Dickinson whether you have anything that you would  
 4 like to add?  
 5 IAN DICKINSON: Just someone small thing, if I may. The  
 6 fundamental principle of building an emergency response  
 7 to major events and emergency plans is that you change  
 8 the routine mechanisms that you use on a daily basis  
 9 in the three emergency services as little as possible.  
 10 You build them, you expand them, make them larger, but  
 11 you don't invent new methodologies. So one of the  
 12 answers to your question about how we can make JESIP  
 13 work has to be making sure that JESIP is used as  
 14 a matter of routine as the very basis of normal  
 15 day-to-day operations, particularly when multi-agencies  
 16 are involved.  
 17 SIR JOHN SAUNDERS: The evidence I have had is that does  
 18 happen. All the people on the ground have said: if we  
 19 go to a road accident where all the rescue services are  
 20 involved, we just all get together and cooperate, and we  
 21 talk to each other because we're all there in small  
 22 enough numbers (overspeaking).  
 23 IAN DICKINSON: We heard the same evidence and I agree with  
 24 your perception, but they express it in a different way  
 25 to the five codified principles. The real strength of

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1 JESIP was that it took existing mechanisms which have  
 2 been around for a long time and codified them, so if  
 3 those principles are codified and used in a codified way  
 4 on a routine basis, then they can be used in the same  
 5 way on a major incident response.  
 6 SIR JOHN SAUNDERS: So whenever the emergency services are  
 7 responding together to whatever it is, you would say  
 8 they should be considering those five principles?  
 9 IAN DICKINSON: Indeed, as well as other parts of JESIP as  
 10 well.  
 11 SIR JOHN SAUNDERS: Thank you.  
 12 MR GREANEY: What you're saying to us, I think, is that  
 13 JESIP just needs to be second nature for every officer  
 14 from bottom to top?  
 15 IAN DICKINSON: Yes, indeed. We've heard the phrase "muscle  
 16 memory" a number of times in the inquiry and that's very  
 17 much the case, that it is the go-to principal structure  
 18 that they use in any response.  
 19 Q. Someone might say that's all very well, but JESIP had  
 20 been in existence for years by the time of the arena  
 21 attack and it didn't work, notwithstanding that training  
 22 had been given. Mr Wilson's expressed his view about  
 23 what needs to be done to ensure that that doesn't happen  
 24 in the future. Do you have any different view or  
 25 anything to add to that he has said?

24

1 IAN DICKINSON: Apart from what I've already suggested about  
 2 building the emergency from the bottom upwards, from the  
 3 routine to the special, nothing more I could add, sir.  
 4 Q. Mr Sirrell, do you have anything else to add on this  
 5 important issue of how we embed JESIP?  
 6 IAIN SIRRELL: I think I would just add to the points that  
 7 Mr Wilson made about — sir, if I may pick up on a point  
 8 you made, it's a natural process and in that response —  
 9 in a simplistic way in that response, it is very natural  
 10 and perhaps the issue that we're looking at is, as  
 11 Mr Wilson said, the command, and that grip of the  
 12 situation to be able to command it from that point.  
 13 SIR JOHN SAUNDERS: Thank you.  
 14 MR GREANEY: Mr Wilson, back to you, I am still dealing with  
 15 JESIP. What we've understood is that JESIP represented  
 16 the principles that were applicable not just to the  
 17 police but to all three emergency services.  
 18 SCOTT WILSON: That's correct, yes.  
 19 Q. Did the joint operating principles emerge out of JESIP?  
 20 SCOTT WILSON: They did.  
 21 Q. Were they intended to represent and reflect JESIP?  
 22 SCOTT WILSON: They were.  
 23 Q. And as we know, you yourself had an involvement in the  
 24 preparation of the Joint Operating Principles edition 3?  
 25 SCOTT WILSON: That's correct, yes.

25

1 Q. Which came out in January 2016?  
 2 SCOTT WILSON: Yes.  
 3 Q. And was the version of the principles that was in force,  
 4 if that's the right way of putting it, at the time of  
 5 the arena attack?  
 6 SCOTT WILSON: It was, yes.  
 7 Q. As I am certain you will agree, when one construes  
 8 a document, one will naturally do so by reference to the  
 9 words used and not the intention of the person who has  
 10 used those words; does that make sense?  
 11 SCOTT WILSON: That's correct.  
 12 Q. After all, the person who's reading it will not  
 13 necessarily, or even usually, have access to the person  
 14 who has drafted it. But nonetheless, as one of the  
 15 authors of JOPs 3, it is relevant to ask you what you  
 16 intended.  
 17 So did you and your colleagues who authored JOPs 3  
 18 intend that it should be prescriptive, setting out rules  
 19 that had to be obeyed?  
 20 SCOTT WILSON: What we wanted was a consistent and  
 21 integrated approach to dealing with an MTA on  
 22 a multi-agency platform, so they're all coming together.  
 23 What we had to take into consideration — and I think  
 24 Mr Thomas has made this quite clear — is that each  
 25 police force in the country is a different size and has

26

1 different capacities and different capabilities, so you  
 2 had to put that into the planning as well, it wasn't  
 3 a one document can, obviously, fit all and it had to be  
 4 a guidance document rather than a complete planning  
 5 document because of that.  
 6 The Metropolitan Police, West Midlands,  
 7 Greater Manchester are going to have greater numbers  
 8 than a lot of smaller forces, so that had to be taken  
 9 into consideration when the document was put together to  
 10 give guidance to how it could be delivered on the  
 11 ground.  
 12 Q. So what the words communicate to a reader obviously is  
 13 one thing but the authors of JOPs 3 intended that it  
 14 should provide guidance as opposed to being a rigid set  
 15 of rules that had to be applied?  
 16 SCOTT WILSON: That's correct, yes.  
 17 Q. And we've been through all of this with Richard Thomas  
 18 and I'm not going to do it with you, but we will just  
 19 look at one page of JOPs 3 and it is {INQ008372/8}. It  
 20 reads:  
 21 "The principles detailed in this document are not  
 22 prescriptive but are intended to provide an overarching  
 23 framework for a standardised approach across the UK.  
 24 They act as guidance to resilience planners and  
 25 emergency responders in the development and

27

1 implementation of local response plans that are  
 2 consistent with the national approach and interpretation  
 3 of the risk."  
 4 And no doubt you would place reliance upon that  
 5 passage?  
 6 SCOTT WILSON: Without a doubt. The major incident plan has  
 7 to be the plan and I've always looked on it — the Plato  
 8 plan bolts itself on to that plan. With an approach  
 9 like this, you deal with it as a major incident and the  
 10 Plato part of it and the JOPs 3 of it is how you then  
 11 have the multi-agency response to deal with the threat.  
 12 SIR JOHN SAUNDERS: Right. I think this is capable of  
 13 meaning two different things to me. So on the one hand,  
 14 you can say: it's not prescriptive, it is guidance to  
 15 individual police forces who have different resources as  
 16 to what they should lay down as a response, so this is  
 17 our guidance to you, police forces, as to what you set  
 18 down to be the response. Or: this is guidance to police  
 19 commanders generally as to what they should do in  
 20 practice on something like happened at the arena.  
 21 SCOTT WILSON: Yes.  
 22 SIR JOHN SAUNDERS: So there's different people having  
 23 discretion —  
 24 SCOTT WILSON: Different interpretations of it, yes.  
 25 SIR JOHN SAUNDERS: So which is it meant to be or both? Is

28



1 it the individual or is it simply guidance to the police  
 2 force?  
 3 SCOTT WILSON: Well, it's guidance to multi-agency -- it's  
 4 not just the police force -- JOPs 3 (overspeaking)  
 5 multi-agency to commanders.  
 6 SIR JOHN SAUNDERS: -- the agency or the individual or both?  
 7 SCOTT WILSON: It's to the organisation and it is to the  
 8 commanders, because I wouldn't expect, apart from  
 9 firearms officers, to have read JOPs 3 in detail, but  
 10 you would expect strategic firearms commanders and  
 11 tactical firearms commanders to be aware of JOPs 3 and  
 12 the content of JOPs 3 and how it can be delivered on the  
 13 ground.  
 14 SIR JOHN SAUNDERS: So you say you must not, in an MTFA, go  
 15 into a hot zone, only armed policemen?  
 16 SCOTT WILSON: Only armed policemen because there's an  
 17 immediate threat (overspeaking) --  
 18 SIR JOHN SAUNDERS: I understand. I understand the reason  
 19 (overspeaking).  
 20 SCOTT WILSON: -- countrywide, countrywide.  
 21 SIR JOHN SAUNDERS: Is that a direction to or a guidance to  
 22 the police forces as to what they lay down? Or is it  
 23 guidance to the individual people on the spot and is it  
 24 only guidance?  
 25 SCOTT WILSON: It's guidance to the commanders, to the

29

1 tactical firearms -- and in this case it turned out to  
 2 be the ground--assigned tactical firearms commander, and  
 3 the ITFC, Mr Sexton, to say: I'm going to designate that  
 4 a hot zone because there's immediate threat to life  
 5 because attackers are present and people shouldn't be  
 6 going in apart from armed officers.  
 7 SIR JOHN SAUNDERS: So you, GMP, when you are considering  
 8 how you are going to respond to an MTFA, our guidance to  
 9 you is you tell your police officers not to go into  
 10 a hot zone and only armed policemen can go in there?  
 11 SCOTT WILSON: Yes.  
 12 SIR JOHN SAUNDERS: So it's guidance to them, they can  
 13 deviate from it, GMP can?  
 14 SCOTT WILSON: I'd say when it comes to zoning, there  
 15 shouldn't be much deviation away from that at all when  
 16 it comes to zoning.  
 17 SIR JOHN SAUNDERS: There shouldn't be, but what then does  
 18 guidance mean? You're guiding them as to what they are  
 19 meant to put in it, but you are not being prescriptive  
 20 to GMP as to what happens. I'm sorry to be nitpicking  
 21 but it does seem to be of some significance to what  
 22 guidance means in JOPs.  
 23 MR GREANEY: Sir, this is, as you'll appreciate, obviously  
 24 an important issue, as revealed by the evidence we have  
 25 heard. Zoning, as we're going to come on to consider,

30

1 is a critical aspect of a Plato response. Certainly  
 2 some held the view on the night that if a zone is hot,  
 3 it's only armed officers that go in, no deviation. They  
 4 held the view also that if it's warm, it's only  
 5 specialist assets that go in, no deviation, no  
 6 discretion, that for example was the position of  
 7 Dan Smith, the NWAS Bronze. And it's only in  
 8 a cold zone that general assets can be deployed.  
 9 So the starting point is, did you intend that JOPs 3  
 10 should be read by a commander in that way: you have no  
 11 discretion to decide to send non--specialist assets into  
 12 a warm zone?  
 13 SCOTT WILSON: Certainly if we start with the hot zone, if  
 14 you look at --  
 15 SIR JOHN SAUNDERS: I think the hot zone we all understand.  
 16 It means there's a gunman there who can shoot you dead  
 17 so we can understand in that.  
 18 SCOTT WILSON: When the document was put together, it was on  
 19 the basis of it's an MTFA attack, it was going to be  
 20 a gunman coming back, so when you look at the definition  
 21 of warm zone, it talks about the gunman entering or  
 22 reentering the area where the attack has taken place and  
 23 as a result of that, there could be threat to life.  
 24 There has been interpretation throughout the inquiry  
 25 when they have then brought IEDs into that. When the

31

1 document was put together it's talking about a gunman  
 2 coming back. That was always the impression: the gunman  
 3 has been flushed out of an area to another area, if you  
 4 can't seal that area, he could come back, it could be a  
 5 danger to people in there, and that's how -- the full  
 6 stop between the reenter and it cannot be safe.  
 7 SIR JOHN SAUNDERS: I think we've finally got that, maybe it  
 8 was from Mr Thomas, but I think we do understand that  
 9 now that the zoning there is only talking about a  
 10 gunman.  
 11 SCOTT WILSON: Yes.  
 12 SIR JOHN SAUNDERS: Again, the problem arises: it's  
 13 a warm zone, is there any discretion to a commander to  
 14 send unprotected operators into that warm zone or is  
 15 what you say absolute law?  
 16 SCOTT WILSON: I think within a warm zone, there could be  
 17 discretion, there could be discretion. Certainly not in  
 18 a hot zone because a hot zone is --  
 19 MR GREANEY: So you think --  
 20 SIR JOHN SAUNDERS: No, no, I understand. Let's put it this  
 21 way: no one could sensibly exercise their discretion to  
 22 send someone into an area where there is likely to be  
 23 a gunman --  
 24 SCOTT WILSON: Where there's gunfire --  
 25 SIR JOHN SAUNDERS: That's really a matter -- it's

32

1 impossible to exercise your discretion that way.  
 2 That is not true necessarily of a warm zone.  
 3 MR GREANEY: And as you appreciate, there is no sensible  
 4 analysis that results in the City Room being a hot zone,  
 5 certainly from 22.45. So this is an important issue:  
 6 what should commanders have understood was their  
 7 entitlement to deploy particular assets into that area?  
 8 SCOTT WILSON: What commanders should have understood was to  
 9 get that from — if they interpreted it as a hot zone at  
 10 the very beginning, to a cold zone as quickly as  
 11 possible. And we put a lot of armed assets into that  
 12 room and into securing that room and our interpretation  
 13 is — our interpretation is by 11 o'clock that is  
 14 starting to move towards a cold zone because you've got  
 15 a lot of armed assets securing that room and there's  
 16 nobody going to re-enter it to carry out any sort of  
 17 attack.  
 18 Q. Obviously that is a very important issue that GMP is  
 19 very concerned to understand and I do want to come to  
 20 that in detail in due course. But just on this point,  
 21 still just dealing with JESIP and JOPs, I believe what  
 22 you're saying to us is that the intention of the authors  
 23 of JOPs 3 was not that commanders should think, "We  
 24 cannot under any circumstances deploy non-specialist  
 25 assets into a warm zone"?

33

1 SCOTT WILSON: That's correct.  
 2 Q. Do you think JOPs 3 could have made that clearer?  
 3 SCOTT WILSON: At the time it was the best document there  
 4 was. We've now seen the new edition and it does make it  
 5 clearer. But at the time, when this document was  
 6 getting put together, it was probably a lot more with  
 7 the focus of that gunman, that marauding — what we've  
 8 seen in Mumbai and what we had seen throughout Europe  
 9 and other cities, returning to an area with a firearm  
 10 and how you could make people safe.  
 11 Q. So what you're saying is that it will often be the case  
 12 that a document can be made clearer and without going  
 13 into the details, the joint operating principles had  
 14 been made clearer in the regard that we're speaking  
 15 about now?  
 16 SCOTT WILSON: They have, as circumstances have changed, as  
 17 we've seen different types of attack methodology, they  
 18 have had to change, but my feeling would be  
 19 in January 2016, when it was then — the document was  
 20 used in May 2017, it was the best document we had at the  
 21 time.  
 22 SIR JOHN SAUNDERS: Almost inevitably, experience will  
 23 demonstrate some shortcomings in whatever advice or  
 24 guidance or report there is.  
 25 MR GREANEY: So I am going to come on to ask you about

34

1 Richard Thomas' evidence in a the moment. Mr Dickinson,  
 2 do you or disagree that JOPs 3 was, certainly judged by  
 3 the standards of May 2017, fit for purpose?  
 4 IAN DICKINSON: I do. It was produced by the best minds,  
 5 the best experts, the best experience we had available  
 6 in the country. It would never have been published if  
 7 it was anything but.  
 8 Q. Mr Sirrell, do you consider it was or was not fit for  
 9 purpose?  
 10 IAIN SIRRELL: Absolutely fit for purpose.  
 11 MR GREANEY: I am just going to check: are those at the back  
 12 able to hear the evidence that is being given? Good.  
 13 Mr Wilson, did you hear the evidence given by  
 14 Richard Thomas in open about that interpretation of  
 15 JESIP and JOPs?  
 16 SCOTT WILSON: I did.  
 17 Q. And indeed the national CTPHQ Plato policy?  
 18 SCOTT WILSON: Yes.  
 19 Q. I hope we can take this shortly, do you agree with all  
 20 the evidence given by Richard Thomas in open about that  
 21 interpretation?  
 22 SCOTT WILSON: I do.  
 23 Q. As everyone knows, there was also a restricted hearing  
 24 in relation to his evidence so that we could consider  
 25 the new JOPs and the New Plato policy. Obviously in

35

1 open I'm not going to go into the detail of that, but  
 2 I can ask you this much: did you have an opportunity to  
 3 view his evidence in the restricted hearing?  
 4 SCOTT WILSON: I have been able to read the transcript, yes.  
 5 Q. And yes or no will suffice I think: do you agree or  
 6 disagree with the evidence he gave about the new JOPs  
 7 and New Plato policy?  
 8 SCOTT WILSON: I fully agree with what he said in that.  
 9 Q. Mr Dickinson, do you have anything that you would like  
 10 to add?  
 11 IAN DICKINSON: Nothing to add, sir.  
 12 Q. And Mr Sirrell?  
 13 IAIN SIRRELL: Nothing to add.  
 14 Q. A connected issue relates to what I will describe as the  
 15 issue of agreement or disagreement. Is it your view  
 16 that if commanders co-locate, it's likely that they will  
 17 agree about risk and the measures that should be taken?  
 18 SCOTT WILSON: They should. That should be — one of the  
 19 first things at the forefront of that decision-making is  
 20 to look at the risk that faces them and how they're then  
 21 going to deal with that risk with the resources they've  
 22 then got available.  
 23 Q. One of the big things that went wrong on 22 May, I'm  
 24 sure everyone will agree with this, is that the  
 25 commanders from the emergency services did not

36

1 co-locate.  
 2 SCOTT WILSON: Correct.  
 3 Q. So they didn't give themselves that opportunity to agree  
 4 about risk and what needed to be done. I think your  
 5 position is that was a major failing?  
 6 SCOTT WILSON: It was one of the major failings, yes.  
 7 Q. Generally, if they do that, they will agree, is that  
 8 your experience?  
 9 SCOTT WILSON: Yes, without a doubt. I think if those three  
 10 emergency services had come together there would have  
 11 been a much greater agreement on that night of how they  
 12 were going to progress from there.  
 13 Q. Have you yourself in your career had an experience of  
 14 commanders co-locating and not ultimately being able to  
 15 agree about those kind of issues?  
 16 SCOTT WILSON: Not at all. As I say, for the majority of my  
 17 service I've been a detective at every rank, but during  
 18 my time in emergency planning I spent a long time within  
 19 our special operations room within the  
 20 Metropolitan Police where there was a lot of big events  
 21 taking place, so whether that was Trooping the Colour,  
 22 the London Olympics, through the riots, and I never  
 23 experienced that within that room within that period of  
 24 time.  
 25 Q. So that gives you some confidence that if there had been

37

1 co-location on this night, things may have been very  
 2 different. An issue I want to explore with you is this:  
 3 although you would expect agreement, one can obviously  
 4 envisage circumstances in which there is disagreement,  
 5 do you agree?  
 6 SCOTT WILSON: Yes, there could be.  
 7 Q. So there may be disagreement about the location of  
 8 an RVP?  
 9 SCOTT WILSON: Possibly, yes.  
 10 Q. There might be disagreement about the location of  
 11 an FCP?  
 12 SCOTT WILSON: Possibly, yes.  
 13 Q. And there might be disagreement about how particular  
 14 locations are to be zoned?  
 15 SCOTT WILSON: Yes.  
 16 Q. So should JESIP and the JOPs cater for that risk and, if  
 17 so, how should it deal with it?  
 18 SCOTT WILSON: I think it does -- I say possibly. With  
 19 an RVP and FCP -- I think the piece that there may be  
 20 some disagreement on is that limit of exploitation, how  
 21 far you're going to then push your resources forward,  
 22 there may be a discussion on that. When it then comes  
 23 to the zoning, there may be a discussion on that.  
 24 But when it comes to FCP and RVP, I can't see,  
 25 especially with the events in Manchester, how they

38

1 couldn't have come to that cathedral car park and the  
 2 FCP, which was eventually at the front of the station,  
 3 and near the war memorial would have been an ideal place  
 4 for that FCP.  
 5 Q. I appreciate that the disagreement didn't emerge at  
 6 a co-located meeting in the circumstances of Manchester,  
 7 but the reality is that there was a disagreement about  
 8 the RVP.  
 9 SCOTT WILSON: There was a disagreement because they weren't  
 10 speaking to each other. I think that night, if Mr Berry  
 11 had been speaking to Mr Nawaz and they'd all been  
 12 together, there probably wouldn't have been the problem.  
 13 The problem was there was that breakdown of  
 14 communication between -- the people who should have been  
 15 speaking to each other weren't speaking to each other  
 16 and Mr Berry obviously couldn't speak to the FDO.  
 17 That's where the breakdown was.  
 18 I feel that if they had come together at the RVP, it  
 19 would have worked much, much better.  
 20 Q. And that is a view that you share with the other  
 21 experts, as you agree. What I'm asking you to deal with  
 22 is a situation in which there is co-location, there is  
 23 discussion, and there is disagreement and the question  
 24 really is: should JESIP and JOPs cater for that  
 25 situation and, moreover, should it give one of the

39

1 emergency services, I don't know what the right way of  
 2 putting it is, a whip hand or a trump card, a way of  
 3 enforcing its view?  
 4 SIR JOHN SAUNDERS: A casting vote.  
 5 SCOTT WILSON: We have listened to this with great interest  
 6 and I feel --  
 7 SIR JOHN SAUNDERS: So have I.  
 8 SCOTT WILSON: I think without a doubt, there's something to  
 9 be gotten there, and it would be to do with the  
 10 incident. I would say that if it's a terrorist  
 11 incident, the casting vote should be the police chief,  
 12 because the police will lead on a terrorist incident.  
 13 SIR JOHN SAUNDERS: I think the first question is should  
 14 there be a situation where there is a casting vote where  
 15 there isn't agreement?  
 16 SCOTT WILSON: I think there should be but it's not going to  
 17 be easy but I think there should be.  
 18 SIR JOHN SAUNDERS: Thank you.  
 19 SCOTT WILSON: I think there should be.  
 20 MR GREANEY: So that's a matter that needs to be considered,  
 21 do you agree?  
 22 SCOTT WILSON: I do, yes.  
 23 Q. And by whom should it be considered?  
 24 SCOTT WILSON: Again I think that's -- this is the second  
 25 part -- all to do with what you're dealing with.

40

1 If we take the Manchester attack, that was a terrorist  
 2 attack, the police would lead on a terrorist attack, it  
 3 should be the police chief that's making that decision.  
 4 If we take a Grenfell fire incident, setting up RVPs,  
 5 FCPs, fire risks, or something like Buncefield, a large  
 6 industrial fire, you wouldn't expect the police chief  
 7 should be able to be dictating that, it probably should  
 8 be the fire chief. I think you would have to look at  
 9 what type of incident you are dealing with and one of  
 10 those three tactical commanders should be making that  
 11 decision.  
 12 SIR JOHN SAUNDERS: If I were to recommend that, are we  
 13 going to achieve it in practice? Are the police going  
 14 to agree in a fire situation to do what the Fire Service  
 15 say and vice versa?  
 16 SCOTT WILSON: I think the problem will be, as the ambulance  
 17 experts and the fire experts made the point, getting  
 18 that piece through, that senior police officers can  
 19 dictate to fire officers where they're going to go and  
 20 how they're going to work, that's all going to be  
 21 between the Police Federations, unions, Colleges of  
 22 Policing — I don't think it's impossible and I think  
 23 it's a great idea, it's just — I know having worked  
 24 in that environment they're never the easiest things to  
 25 move forward.

41

1 SIR JOHN SAUNDERS: Thank you.  
 2 MR GREANEY: If the chairman is to make a recommendation,  
 3 this is an issue that needs to be explored, who is it,  
 4 which organisation is it that needs to look at whether  
 5 that is a realistic recommendation to bring into effect?  
 6 SCOTT WILSON: I think it becomes complicated because you  
 7 could say the College of Policing from policing and with  
 8 equivalents within the other services, but when you then  
 9 bring terrorism into it, you would then have to start  
 10 bringing in the, for instance, OSCT, Home Office, people  
 11 like Richard Thomas' team would have something to say  
 12 about that as well, so it becomes more complicated. It  
 13 becomes quite simple, I think, at a general major  
 14 incident, but when you start talking about terrorism  
 15 you'd have to have more people round to actually —  
 16 because the decisions there are — there's going to be a  
 17 lot more threat and risk involved in those decisions  
 18 than there would be at a general major incident.  
 19 Q. We need, the chairman needs, to identify who he is going  
 20 to direct this recommendation to if he's going to make  
 21 a recommendation. So should he be inviting the  
 22 Home Office, Cabinet Office or some different body to  
 23 consider this issue of a casting vote?  
 24 SCOTT WILSON: I think it would be the Home Office together  
 25 with the College of Policing and the equivalents within

42

1 fire and ambulance.  
 2 Q. Sir, I've concluded my gentlemen questions about JESIP.  
 3 I'm going to move on unless you have anything that you  
 4 wish to ask about.  
 5 SIR JOHN SAUNDERS: No. I'm afraid, having heard from  
 6 everybody, I still at the moment, and I'll obviously  
 7 consider all the evidence again, remain unconvinced that  
 8 there will not be occasions when people disagree on  
 9 important issues like, "Can we send unprotected  
 10 paramedics into this area?"  
 11 SCOTT WILSON: Yes.  
 12 SIR JOHN SAUNDERS: It seemed to me, even if there had been  
 13 a discussion at the scene outside the City Room by the  
 14 commanders of both, I suspect they would not have agreed  
 15 about that on the evidence I have heard.  
 16 MR GREANEY: When one looks at the conversation or listens  
 17 to the conversation that Mr Dexter had at, I think,  
 18 about 00.15 when zoning was spoken about, when Mr Berry  
 19 is there and Mr Hynes, agreement was not reached  
 20 immediately, was it?  
 21 SCOTT WILSON: It wasn't, but there was discussion there.  
 22 Q. So there is undoubtedly a basis for the chairman's  
 23 concern and therefore an issue that needs to be  
 24 consider; do you agree?  
 25 SCOTT WILSON: Yes, most certainly.

43

1 Q. Mr Sirrell, you wanted to add something.  
 2 IAIN SIRRELL: I was just going to say, if I may, one of the  
 3 issues perhaps, central issues, is that joint  
 4 understanding of risk. One of the things, to take  
 5 Mr Greaney's point, was that lack of discussion and was  
 6 that lack of clarity around what the actual position  
 7 was. And I think that once you have that, once you have  
 8 that clarity, that understanding, and you're quite clear  
 9 about, "I am making this decision because", and, "This  
 10 is where we're at", that agreement should come quite  
 11 quickly.  
 12 SIR JOHN SAUNDERS: I agree, and it's sensible, that there  
 13 should be discussions before anything like this happens  
 14 as to what is going to be acceptable in what  
 15 circumstances. But even allowing for that, there may  
 16 still be occasions when they can't reach agreement. But  
 17 I agree, you can do more to try and get some common  
 18 ideas before this all happens.  
 19 MR GREANEY: Issue 2. I'm going to direct these questions  
 20 in the first instance to Mr Dickinson, although I should  
 21 ask, is there anything that you want to add to the  
 22 discussion which has just taken place?  
 23 IAN DICKINSON: Only a little, in that I agree with  
 24 everything my colleagues have said. I think my view  
 25 would be that there is not an obvious and imminent need

44

1 for a trump card. But if there is going to be  
 2 a recommendation that the trump card should be explored,  
 3 then I agree entirely with what Mr Wilson has said.  
 4 MR GREANEY: Next topic, Mr Dickinson, is what is described  
 5 in your second report as perception of risk. I'm going  
 6 to read to you what you say at page 237 of that report  
 7 of August 2020 and then ask you to explain it. You say,  
 8 and speaking for myself, you don't seem to be expressing  
 9 a different view from those expressed by other experts:  
 10 "We remain of the opinion that there appears to have  
 11 been a disparity of risk perception or the approach to  
 12 risk assessment between GMRF partners at the time of the  
 13 attack. Either the police or GMRF may have been  
 14 applying an inappropriate or at least different  
 15 benchmark to their risk assessment. The difference of  
 16 risk perception and boundaries of acceptable risk  
 17 between the agencies could be a matter of significant  
 18 concern which may be considered by the inquiry."  
 19 Let me just read that final sentence again:  
 20 "The difference of risk perception and boundaries of  
 21 acceptable risk between the agencies could be a matter  
 22 of significant concern which may be considered by the  
 23 inquiry."  
 24 I'm going to ask you, just in a few sentences, if  
 25 you can, to explain what you meant in saying that.

45

1 IAN DICKINSON: Yes, sir. If we take the first response,  
 2 the first people to arrive at the City Room were British  
 3 Transport Police officers, and we've seen the video  
 4 footage of them heading into the area of danger very  
 5 quickly without a considerable degree of caution.  
 6 Because I'm sure that their dynamic risk assessment  
 7 recognised that there was a risk to themselves, but  
 8 nevertheless, there was also a significant risk to the  
 9 casualties and survivors of being left without  
 10 assistance. We saw that also to a slightly lesser  
 11 degree with the Ambulance Service.  
 12 I would add a caveat, though, that there is a  
 13 difference between the police service and the other two  
 14 organisations. The police service operates very largely  
 15 on police officers having an individual authority and an  
 16 individual responsibility. That is rather different to  
 17 the Fire Service, who are a hierarchical organisation,  
 18 and individuals do not have that freedom to make  
 19 individual decisions.  
 20 Nevertheless, the benchmark applied by the  
 21 North West Fire Control and by Mr Berry appeared to us  
 22 at the time of writing that report, and we think it has  
 23 been born out by the subsequent oral evidence, that all  
 24 the focus seemed to be on the safety of firefighters,  
 25 whereas the focus for the police officers who responded,

46

1 their individual focus, was on both: "Am I safe to be  
 2 here?" but also, "Do I need to take risks in order to  
 3 assist those people who are injured?" That's what we  
 4 meant about benchmark.

5 Those individuals who went into the City Room  
 6 appeared to review the situation and adapt in one  
 7 particular way, but recognising that there was a risk to  
 8 be taken, whereas the actions taken by Mr Berry appeared  
 9 to be applying only a benchmark applying to the safety  
 10 of firefighters.

11 Q. Can I just explore that with you and see whether what  
 12 you are describing was just an isolated problem, a very  
 13 serious one, but an isolated problem that emerged out of  
 14 a particular personality or personalities on the night,  
 15 or whether you're describing something which may be more  
 16 of a concern across the country?

17 IAN DICKINSON: I don't think I could say honestly that I've  
 18 recognised it in other places at all. It was purely  
 19 a response to the evidence we've seen in this inquiry.

20 Q. That's very helpful. Do you agree that generally  
 21 we would want the three emergency services to have the  
 22 same appetite for risk?

23 IAN DICKINSON: Absolutely, and I have no doubt after  
 24 hearing the evidence of firefighters that there was no  
 25 absence of appetite for risk amongst the firefighters

47

1 themselves. It appeared to be an organisational  
 2 reluctance rather than one which was expressed by the  
 3 individuals.

4 Q. So we would want the same appetite for risk not just on  
 5 the part of the individual emergency responders but on  
 6 the part of the organisations?

7 IAN DICKINSON: Indeed.

8 Q. Would we expect each of those organisations to engage in  
 9 a balancing exercise, weighing on one side of the  
 10 balance the risk to the public against, on the other  
 11 side, the risk to responders?

12 IAN DICKINSON: Certainly and that's one of the basic  
 13 principles of JESIP.

14 SIR JOHN SAUNDERS: I just wonder whether there is  
 15 a different reason for this, and this is just thinking  
 16 aloud so it may be nonsense. It seems that what  
 17 happened on the night was: there was an explosion,  
 18 something happened at the arena, let's get as many  
 19 policemen there, unarmed, any sort of policemen there as  
 20 soon as possible. So the direction is to just get  
 21 there, get in there, see what's going on. You can't  
 22 actually do that with firefighters because they're all  
 23 going on a fire engine, they need to know what they're  
 24 going to do when they get there. So actually just  
 25 saying to firefighters, "Get in there and all of you get

48

1 out of your fire engine and leap in and see what's going  
 2 on", would not be a practical way for them to operate,  
 3 would it?  
 4 IAN DICKINSON: Agreed, sir, and indeed the police service  
 5 operate in that same way as the Fire Service once police  
 6 resources are brigaded together and operating as a unit  
 7 under command. But for the majority of the case police  
 8 officers operate as individuals — (overspeaking).  
 9 SIR JOHN SAUNDERS: So BTP who were near, they all rushed  
 10 there because that's the way they are trained to do it  
 11 and other GMP police officers, who came from as near as  
 12 they could, did that. There are teams of firefighters  
 13 who are going in all together. So it may be almost  
 14 inevitable they have to operate in a different way and  
 15 that may not be due to any different assessment of risk.  
 16 IAN DICKINSON: I think the assessment of risk and the  
 17 application of that, sir, are perhaps two different  
 18 things. I wouldn't want to talk too much about the Fire  
 19 Service myself, but the appearance of it is a decision  
 20 was made by one person on behalf of many others in terms  
 21 of the Fire Service, whereas the police service made  
 22 a lot of individual decisions.  
 23 SIR JOHN SAUNDERS: I quite understand in Mr Berry's case  
 24 what the argument is, that he took the wrong decision  
 25 and didn't balance the risk in the right way. But to

49

1 try and apply the same standard of how police officers  
 2 would behave to the way fire officers should behave, of  
 3 getting to the scene and just getting in there, would  
 4 seem to me just to be — it doesn't help.  
 5 IAN DICKINSON: We sought only, sir, to suggest that it's  
 6 a matter for the inquiry to explore. I think we made  
 7 quite clear that we didn't feel there was a definitive  
 8 statement of concern.  
 9 SIR JOHN SAUNDERS: I'm only thinking aloud about some of  
 10 the problems.  
 11 MR GREANEY: And I'm just interested to understand, first of  
 12 all, the nature of the problem and, secondly, what the  
 13 solution to it might be. Whilst of course having regard  
 14 to the chairman's point, one would expect the different  
 15 emergency services to be balancing the same two factors?  
 16 IAN DICKINSON: Yes.  
 17 Q. Would you expect each of the emergency services in that  
 18 balancing exercise to favour, if this is the right way  
 19 of putting it, the risk to the public over the risk to  
 20 the emergency responders?  
 21 IAN DICKINSON: I think that balance changes depending on  
 22 the nature of the risk, the nature of the threat and the  
 23 ability of the individual organisation to manage that  
 24 risk or threat. In the example of a fire, the Fire  
 25 Service are very well equipped to manage the risk in an

50

1 appropriate way, but certainly the focus on keeping  
 2 emergency services officers safe at the expense of the  
 3 continued risk to casualties and survivors is one that  
 4 has to be weighed very carefully and I would hope there  
 5 is a focus on getting help to people rather than keeping  
 6 emergency service workers safe.  
 7 Q. What Richard Thomas told us when we looked at the Plato  
 8 policy, and obviously I'm talking about the Plato policy  
 9 that was in force at the time, was that principle 1 is  
 10 effectively to save lives, save the public's lives. And  
 11 so do you agree that, as of May 2017, that was the  
 12 priority of the police in the decisions that they made  
 13 as to a response?  
 14 IAN DICKINSON: I'm certain that was the case.  
 15 Q. And you're quite right, of course you can't speak for  
 16 the other emergency services, but would you think it  
 17 desirable that that should be the priority also for the  
 18 other emergency services?  
 19 IAN DICKINSON: Yes, sir.  
 20 SIR JOHN SAUNDERS: And they would all say it was.  
 21 MR GREANEY: Yes. On the night, obviously there were  
 22 different approaches by the different emergency  
 23 services, so as you say, BTP and GMP were in the  
 24 City Room very quickly indeed.  
 25 IAN DICKINSON: Yes, they were. We made a point of looking

51

1 at the evidence again and we couldn't find a single  
 2 example of a police officer demurring about going into  
 3 any part of the station area or the arena because it was  
 4 unsafe.  
 5 Q. We know that so far as NWS are concerned, Paddy Ennis,  
 6 without any ballistic protection or specialist  
 7 equipment, deploys into the City Room and two members of  
 8 HART also volunteer to go in there as well. So we have  
 9 representatives at a relatively early stage of both of  
 10 those emergency services. And we know that that  
 11 situation is in stark contrast to the position with the  
 12 Fire and Rescue Service.  
 13 Really, what I'm concerned to understand is — who  
 14 knows whether that was a kind of problem that might be  
 15 replicated across the country in similar incidents. We  
 16 do know that kind of thing had occurred in other  
 17 exercises. But the question is: first of all, if  
 18 that is a problem, is it to be solved by having some  
 19 mechanism by which each emergency service assesses risk  
 20 in the same way and by reference to the same criteria?  
 21 Do you understand what I'm driving at in that question?  
 22 IAN DICKINSON: Yes, I do. I think it would be enormously  
 23 difficult to establish those criteria and apply them  
 24 consistently. However, and at risk of banging the same  
 25 drum again, if the principles of JESIP are applied, and

52

1 people do co-locate, communicate and jointly assess  
 2 risk, I'm certain that that benchmark can be approached  
 3 in the same way. But perhaps a greater specification of  
 4 that benchmark would assist.

5 SIR JOHN SAUNDERS: In a way, we ought to be comparing  
 6 commanders' attitudes rather than the individual police  
 7 officers' attitudes. So Inspector Smith in command  
 8 at the scene was certainly not stopping people going in  
 9 there and he was encouraging them to go in there.  
 10 Patrick Ennis went in without actually any instruction  
 11 to, he just went of his own accord, but Dan Smith took  
 12 the decision for him to go back in there, even though,  
 13 strictly applying JOPs, one might say he shouldn't have  
 14 gone back in. So it is in effect, but he doesn't send  
 15 other people in, so it seems to me that comparing the  
 16 commanders -- and Mr Berry took the view he wasn't  
 17 sending anyone anywhere near the arena. So it's  
 18 contrasting those attitudes which may be the important  
 19 thing.

20 MR GREANEY: And do you accept that?

21 IAN DICKINSON: I understand your point, sir, yes.

22 SIR JOHN SAUNDERS: The question is do you accept it, not  
 23 whether you understand it.

24 MR GREANEY: Do you accept the point?

25 IAN DICKINSON: I think it's a matter for a lot of debate,

53

1 sir, to be fair, rather than an individual personal  
 2 view.

3 SIR JOHN SAUNDERS: Okay.

4 MR GREANEY: I understand that answer. But obviously, the  
 5 chairman needs to consider if this is or might be  
 6 a problem and what to do about it. The way in which you  
 7 put it in the report is:

8 "The difference of risk perception and boundaries of  
 9 acceptable risk between the agencies could be a matter  
 10 of significant concern which may be considered by the  
 11 inquiry."

12 And we are considering it. But what ought to be, in  
 13 your judgement, the three of you, the outcome of that  
 14 consideration? What needs to be done to address this  
 15 issue and make it better?

16 IAN DICKINSON: I honestly can't answer the question, sir.  
 17 All I can say to you if the JESIP principles are applied  
 18 and there is guidance about the mechanism of achieving  
 19 that joint risk assessment, then I think the matter is  
 20 best addressed by the assembled experts of the country  
 21 to develop a new approach or a slightly adjusted  
 22 approach rather than me trying to give a solution.

23 Q. So who should the chairman be inviting to consider this  
 24 issue? Should it be those who are responsible for  
 25 JESIP? Should it be the Home Office? Should it be the

54

1 Cabinet Office? You tell us.

2 IAN DICKINSON: The existing JESIP policy development  
 3 structures are very well-established and that would be  
 4 a very sensible route. I'm sure that the Civil  
 5 Contingencies Secretariat of the Cabinet Office who  
 6 sponsor that are an equally valid route as well.

7 MR GREANEY: This issue of perception of risk obviously is  
 8 a difficult and big issue.

9 SIR JOHN SAUNDERS: It's a big issue, absolutely.

10 MR GREANEY: I'm not sure that I have brought a lot of  
 11 clarity.

12 SIR JOHN SAUNDERS: You have. We just need to be sure, it  
 13 seems to me, we're comparing like with like.

14 MR GREANEY: I understand.

15 SIR JOHN SAUNDERS: So I'm not sure saying individual  
 16 unarmed policemen rushed into the scene should be  
 17 compared to Mr Berry's decision because they're actually  
 18 doing a different thing. But we'll look at it.

19 MR GREANEY: Maybe the point ultimately is: perhaps you  
 20 can't do anything about the fact that there will be  
 21 a different perception of risk, it may be appropriate  
 22 there is a different perception of risk, but surely each  
 23 emergency service should have an understanding of how  
 24 the other emergency services will approach that issue.

25 IAN DICKINSON: That's certainly true, but I would also hope

55

1 that whatever process is applied, either a joint process  
 2 or a several process between different agencies, that  
 3 the result is that people who are in need of help by the  
 4 emergency services receive it.

5 SIR JOHN SAUNDERS: So the encouraging thing is, for the  
 6 future's point of view, the Fire Service has  
 7 unequivocally accepted that they made the wrong  
 8 decisions on the night, so undoubtedly they are  
 9 receptive to looking at it again and trying to make sure  
 10 it doesn't happen again.

11 MR GREANEY: That is certainly correct.

12 Mr Dickinson, I'm just going to leave you for  
 13 a moment and ask Mr Wilson whether he has any  
 14 contribution to make, further contribution, on this  
 15 important issue of perception of risk.

16 SCOTT WILSON: No, no further contribution.

17 IAIN SIRRELL: I think just to add if I may, when we talk  
 18 about different organisations appreciating the same  
 19 risk, it's individuals within the same organisations.  
 20 We each discussed a similar matter whereby we'd been --  
 21 taken over command and viewed something in a different  
 22 way and, much in the same way as Mr Greaney said about  
 23 the written word, we all view it slightly differently  
 24 and everyone has that different understanding of how it  
 25 works, accepting that the decision that you will make,

56

1 somebody else may come after you and view it slightly  
 2 differently .  
 3 SIR JOHN SAUNDERS: Well, I'm grateful. And at the stage  
 4 when we're considering recommendations, perhaps when we  
 5 have gone a bit further down the line of that, we will  
 6 come back to you to see whether you're able to say  
 7 anything concrete about what we are thinking of doing.  
 8 MR GREANEY: And sir, I'm certain your position will be that  
 9 if, as a result of the questions the experts are asked  
 10 over the course of the next 3 days, they have any  
 11 further thoughts, they can set those out in writing.  
 12 SIR JOHN SAUNDERS: Absolutely.  
 13 MR GREANEY: Moving on to the next topic, which is the Local  
 14 Resilience Forum. Mr Dickinson, I think probably these  
 15 questions are best directed to you in the first  
 16 instance.  
 17 As we know very well, the Cabinet Office published  
 18 a reference document before the arena attack, relating  
 19 to the concept of a Local Resilience Forum. And  
 20 Mr Lopez, I'm hoping this is right reference,  
 21 {INQ019376/1}. So the role of Local Resilience Forums,  
 22 a reference document, July of 2013. This, I believe,  
 23 was the version in force at the relevant time.  
 24 {INQ019376/10} of that document sets out the purpose  
 25 of such a forum. We've looked at this a number of

57

1 times:  
 2 "The purpose of the LRF process is to ensure  
 3 effective delivery of those duties under the Act..."  
 4 That's a reference, is it not, to the Civil  
 5 Contingencies Act?  
 6 IAN DICKINSON: Yes, it is.  
 7 Q. "... that need to be developed in a multi-agency  
 8 environment and individually as a category 1 responder."  
 9 And each of the emergency services, as we know, is  
 10 a category 1 responder:  
 11 "In particular the LRF process should deliver: the  
 12 compilation of agreed risk profiles for the area through  
 13 a Community Risk Register; a systematic, planned and  
 14 coordinated approach to encourage category 1 responders,  
 15 according to their functions, to address all aspects of  
 16 policy in relation to risk; planning for emergencies;  
 17 planning for business continuity management; publishing  
 18 information about risk assessments and plans;  
 19 arrangements to warn and inform the public; and other  
 20 aspects of civil protection duty, including the  
 21 promotion of business continuity management by local  
 22 authorities; and support for the preparation by all or  
 23 some of its members of multi-agency plans and other  
 24 documents, including protocols and agreements and the  
 25 coordination of multi-agency exercises and other

58

1 training events."  
 2 So in simple terms, in accordance with the reference  
 3 document, the Local Resilience Forum has a very  
 4 important role to play in the preparation for a major  
 5 incident?  
 6 IAN DICKINSON: It does, yes.  
 7 Q. Including a terrorist attack?  
 8 IAN DICKINSON: Yes, it does.  
 9 Q. In relation to plans, including multi-agency plans and  
 10 in relation to exercising?  
 11 IAN DICKINSON: Yes.  
 12 Q. So what we need to consider is whether that matched the  
 13 reality .  
 14 I want to consider with you two issues: first ,  
 15 enforcement and, secondly, resources. So we'll begin by  
 16 looking at some of the evidence that we heard about the  
 17 issue of enforcement. Mr Lopez, could we have the  
 18 transcript for Day 58, please. This is the evidence of  
 19 Paul Argyle, who was chair of the Greater Manchester  
 20 Local Resilience Forum at the time of the arena attack,  
 21 from whom we've heard twice. Page 26 {Day58/26:1},  
 22 please.  
 23 This was an issue posed by the chairman. We can see  
 24 there that the forums do not have the power to direct  
 25 its members. Is that in your view a shortcoming in the

59

1 act and in the way they operate? As I say, if you  
 2 wanted to have time to think about that, by all means do  
 3 and come back to me later.  
 4 IAN DICKINSON: No, it's a matter all three of us have  
 5 considered at some length. In the first place, LRFs  
 6 across the country work effectively as forums for  
 7 consultation and consensus decision-making. And it's  
 8 important to recognise that is the basis on which they  
 9 work. They draw their legitimacy from the presence  
 10 in the strategic group of the assembled chief officers  
 11 of all the emergency services, other category 1  
 12 responders, and some of the categories 2 responders.  
 13 That's where the legitimacy and their authority comes  
 14 from --  
 15 Q. Pause for one moment. At the moment you're making  
 16 a general point that their legitimacy is based upon  
 17 consensus?  
 18 IAN DICKINSON: Indeed.  
 19 Q. And upon participation by the emergency services at  
 20 a senior level?  
 21 IAN DICKINSON: Yes.  
 22 Q. Sorry, would you continue, please.  
 23 IAN DICKINSON: The LRF efficiency and effectiveness varies  
 24 according almost in direct proportion to the effort and  
 25 commitment of the chief officers at strategic level .

60



1 And we see frequently around the country where there is  
 2 a strong strategic lead from category 1 responder chief  
 3 officers , then the LRF is also a strong and effective  
 4 organisation.  
 5 But it is the case that it has no audit or  
 6 inspection function at all unless the assembled chief  
 7 officers give it that authority and that direction .  
 8 Q. Pause again for a moment. So as matters stand, the  
 9 Local Resilience Forum, here and around the country, can  
 10 as a result of consensus say that a particular thing  
 11 should happen so that a particular plan needs to be  
 12 changed or a particular exercise needs to occur?  
 13 IAN DICKINSON: Yes.  
 14 Q. The point you're making is that the forum, unless the  
 15 chief officers agree, doesn't have the power to audit or  
 16 inspect to ensure that what it wished to happen has in  
 17 fact happened?  
 18 IAN DICKINSON: That's correct, sir, that's the position.  
 19 Q. Do Local Resilience Forums have the power to enforce  
 20 their wish?  
 21 IAN DICKINSON: No, they don't. They have no statutory  
 22 power at all.  
 23 Q. So is this in your view, and I'll turn to the others in  
 24 a moment, a problem or at any rate an issue that needs  
 25 to be looked at? Should the Local Resilience Forum have

61

1 a power of audit and inspection and should it have  
 2 a power of enforcement?  
 3 IAN DICKINSON: I will make the distinction if I may between  
 4 power and role. In the UK we tend not to codify in  
 5 a strategic frame the requirements of various inspection  
 6 regimes and compliance audits. For example, HMIC does  
 7 a very detailed inspection of police forces and now of  
 8 Fire and Rescue Services as well. And very little of  
 9 their work, and certainly very little of their  
 10 recommendations or requirements, need to have the  
 11 backing of statutory authority because there is a very  
 12 strong compliance ethic amongst the emergency services  
 13 of police and fire .  
 14 If the chair were minded to make a recommendation  
 15 that the role of the LRFs could be strengthened and to  
 16 give it more of a compliance audit role, then I would  
 17 suggest that it doesn't need the backing of a statutory  
 18 base, it could be achieved really by a change in  
 19 perception and a change in statements by those  
 20 organisations that are responsible for police and fire  
 21 at government level, essentially the Home Office.  
 22 SIR JOHN SAUNDERS: How far is the fact of compliance with  
 23 recommendations from the Inspectorate due to the fact  
 24 that the press pick up on those sort of detailed  
 25 inspections and they will make clear to the public where

62

1 the failings are, which puts quite a lot of pressure to  
 2 people to actually follow those recommendations and put  
 3 things right? Would that apply in the case of an LRF?  
 4 IAN DICKINSON: I'm sure you're right, sir. It's part of  
 5 the checks and balances, the ways in which our  
 6 organisation in this country works. I wouldn't -- I do  
 7 not think that the chief officers and chief police  
 8 officers that I have known would wish to make their  
 9 decisions and give the actions to the LRF on the basis  
 10 of what the public might think one way or the other.  
 11 It's either right to do it or it is wrong and I would  
 12 hope the media reaction would be to recognise where  
 13 things are being done correctly and highlight where  
 14 there are gaps.  
 15 SIR JOHN SAUNDERS: But is your suggestion, the  
 16 recommendation to me, to say: come on, you should follow  
 17 what LRFs tell you to do, which you're not always doing  
 18 at the moment, go away and do better?  
 19 IAN DICKINSON: I'm sure they would do, sir. I have seen  
 20 very rarely reports from HMICFRS come out to chief  
 21 officers and for chief officers simply to ignore them or  
 22 not follow them. There may be disagreement and then  
 23 further discussion about particular issues , but by and  
 24 large the ways in which the relationship between the  
 25 Inspectorate and the organisations worked is a very

63

1 symbiotic one and certainly the police services that  
 2 I've been familiar with are very responsive to  
 3 requirements or recommendations from HMIC.  
 4 MR GREANEY: It's really a question of whether your view  
 5 is that Local Resilience Forums should have more teeth,  
 6 I suppose is one way of putting it, or at any rate that  
 7 that's an issue that ought to be considered by, one  
 8 would have thought, the Home Office.  
 9 IAN DICKINSON: I think we collectively have the view that  
 10 it would be beneficial if the LRFs had a stronger role  
 11 in developing compliance and developing capability. But  
 12 how that's achieved I think is a matter for others to  
 13 consider.  
 14 Q. We do actually here, on the facts of Manchester, have a  
 15 worked-up example of how it didn't work perfectly  
 16 because the LRF, the Greater Manchester Resilience  
 17 Forum, was involved in the arrangements for Exercise  
 18 Winchester Accord, was it not?  
 19 IAN DICKINSON: It was -- well, now, I demur a little bit to  
 20 my colleague, Mr Wilson, because he has more knowledge  
 21 of this than I do.  
 22 SCOTT WILSON: They were tied in with Winchester Accord.  
 23 What they didn't do is, when the recommendations came  
 24 out at the end of Winchester Accord, they weren't  
 25 a driver or went any way to push those recommendations

64

1 forward.  
 2 Q. That's the point. As we know from Mr Argyll, there were  
 3 important lessons that emerged out of Winchester Accord  
 4 that the Local Resilience Forum just didn't know  
 5 anything about?  
 6 SCOTT WILSON: That's absolutely correct.  
 7 MR GREANEY: And bearing in mind what the Cabinet Office  
 8 reference document tells us a Local Resilience Forum is  
 9 all about, that sounds unsatisfactory.  
 10 SCOTT WILSON: Yes. When you look at the scale of  
 11 Winchester Accord as an exercise, the Local Resilience  
 12 Forum should have been much more embedded in that from  
 13 beginning to end.  
 14 Q. So what I'm suggesting to you, if it's for me to suggest  
 15 anything, is that might provide us with an example  
 16 supporting the proposition that the Local Resilience  
 17 Forum does need, as you put it, more of a role, as I've  
 18 put it, more teeth? And you're nodding your head.  
 19 IAN DICKINSON: I think we all agree that that's the case;  
 20 how you achieve it may be debatable.  
 21 Q. How you achieve it or part of it is obviously giving it  
 22 powers, but also, do you agree, ensuring that the Local  
 23 Resilience Forum has adequate resources?  
 24 IAN DICKINSON: That has to be the case, yes.  
 25 Q. And can we have another page of the transcript up for

1 the same day, please, Mr Lopez? Page 48 of Day 58. The  
 2 very bottom of that page {Day58/48:21}:  
 3 "Question: In terms of administration, how many  
 4 full-time employees did GMRF have during your period?  
 5 "Answer: One.  
 6 "Question: What was the role of that person?  
 7 "Answer: He was an administrator to support the  
 8 GMRF."  
 9 Then that person was identified.  
 10 Mr Argyle was asked:  
 11 "Question: Was one person a sufficient number in  
 12 your view?  
 13 "Answer: What I'd say is we clearly used other  
 14 people and their resources and their time to large  
 15 extent. That one person could not do the work required  
 16 of the resilience forum, clearly."  
 17 And so it does not sound from that as if the  
 18 Greater Manchester Resilience Forum at the time we are  
 19 concerned with was particularly heavily resourced; do  
 20 you agree?  
 21 IAN DICKINSON: I think that is the case but we have also  
 22 seen evidence that all three emergency service seconded  
 23 people to the resilience forum at various times and for  
 24 various purposes and all three organisations, in our  
 25 case particularly Greater Manchester Police, supported

1 the resilience forum with capability, with premises and  
 2 with support and indeed financial support as well.  
 3 I wouldn't suggest that the resilience forum was  
 4 adequately resourced, but it was supported certainly in  
 5 other ways by Greater Manchester Police.  
 6 Q. That's a very clear answer, thank you.  
 7 What it seems you do agree about is that if a Local  
 8 Resilience Forum, not just talking about Manchester, but  
 9 anywhere, is to fulfil the role provided to it by the  
 10 reference document, then it will need to be properly  
 11 resourced in order to do that?  
 12 IAN DICKINSON: Yes, sir, I would agree with that.  
 13 Q. Before I just move on to some further specifics  
 14 in relation to the Greater Manchester Resilience Forum,  
 15 Mr Wilson, do you have anything that you wish to add?  
 16 SCOTT WILSON: Nothing to add.  
 17 IAIN SIRRELL: Nothing, sir.  
 18 Q. I'm going to turn next to the issue of participation in  
 19 the Greater Manchester Resilience Forum and we have  
 20 looked at this frequently and in detail with various  
 21 witnesses including ACC O'Callaghan and Deputy  
 22 Chief Constable Pilling.  
 23 In short, is it your view, Mr Dickinson, that both  
 24 GMP and BTP engaged at too junior a level too frequently  
 25 in the Greater Manchester Resilience Forum?

1 IAN DICKINSON: I think that is the case. I'd perhaps add  
 2 an adjective to suggest that it's not consistent  
 3 representation.  
 4 Q. And what, from a practical point of view, do you  
 5 consider the consequences of that state of affairs to  
 6 have been?  
 7 IAN DICKINSON: As I think I mentioned a few moments ago, as  
 8 we see local resilience forums around the country, and  
 9 collectively we see many, those which are most  
 10 successful, those which have the greatest success are  
 11 those that are directed by a strong strategic group.  
 12 A strong strategic group gives the organisation a firm  
 13 direction, it gives it support and resource and enables  
 14 it to deliver on behalf of all the agencies. We also  
 15 see the opposite: a fairly weak strategic group results  
 16 in the organisation lacking direction, lacking energy,  
 17 and the product is equally reduced.  
 18 Q. Is the point that if a Local Resilience Forum is going  
 19 to drive change, if it is going to perform the role that  
 20 the reference document anticipates, the people who  
 21 attend the resilience forum need to be people with  
 22 sufficient authority to bring that home?  
 23 IAN DICKINSON: Indeed, sir, yes.  
 24 Q. And was it your view, from what you saw, that that was  
 25 not achieved at the relevant time by GMP or BTP?

1 IAN DICKINSON: That was certainly the case, sir, yes.  
 2 Q. No doubt you listened with care to what Deputy  
 3 Chief Constable Pilling of GMP and ACC O'Callaghan of  
 4 BTP said about this issue?  
 5 IAN DICKINSON: Yes, we did.  
 6 Q. Were you heartened by what each of them said about the  
 7 approach that their organisations now have to the Local  
 8 Resilience Forum?  
 9 IAN DICKINSON: Yes, sir, we were.  
 10 Q. So that means that the problem seems to have been solved  
 11 within the Greater Manchester Resilience Forum, but when  
 12 the chairman comes to consider recommendations, do we  
 13 need to make sure that around the country there is on  
 14 each Local Resilience Forum a proper level of  
 15 representation?  
 16 IAN DICKINSON: That's certainly true, sir. We listened to  
 17 the evidence of — I think it was Ms Gillespie from the  
 18 Department of Health — sorry, DHCLG. She was very  
 19 careful in the way she expressed it, but I think that  
 20 a direction from the Resilience Emergency Division to  
 21 look at the representation on the strategic group of  
 22 LRFs and to call the LRFs to account when that strategic  
 23 direction isn't being given would be of benefit.  
 24 Q. Just to bring this particular topic to an end before we  
 25 break for lunch, I anticipate, what we should be

69

1 thinking in terms of, moving forward, is should the LRFs  
 2 have more teeth? Should their resourcing be different?  
 3 And should measures be taken to ensure that there is  
 4 representation on each Local Resilience Forum at an  
 5 appropriate level?  
 6 IAN DICKINSON: And consistent, sir, representation.  
 7 I think your summary is accurate, yes.  
 8 SIR JOHN SAUNDERS: That's quite difficult to achieve, isn't  
 9 it? Senior officers do tend to be moving from different  
 10 positions on a quite regular basis. That seemed to be  
 11 the evidence in relation to GMP.  
 12 IAN DICKINSON: That's certainly true. Nevertheless, it's  
 13 an important building block of multi-agency resilience  
 14 and it seems to us to be so central to the success of  
 15 a multi-agency response that it should be given that  
 16 strength and that strength of purpose.  
 17 SIR JOHN SAUNDERS: Right. Is GMP in your view at the time  
 18 of this attack — were they unique in not providing that  
 19 level of representation or is that something which you'd  
 20 find across the country?  
 21 IAN DICKINSON: Not in our experience, sir. There have been  
 22 similar occasions when we have seen a similar picture.  
 23 SIR JOHN SAUNDERS: Okay, thank you.  
 24 MR GREANEY: Sir, I'm going to turn next to the issue of  
 25 plans. This would be a convenient moment for lunch.

70

1 SIR JOHN SAUNDERS: We'll break until 2 o'clock. I know you  
 2 intend, as far as we can, to try and catch up some time  
 3 that we unfortunately lost this morning, so just so  
 4 people know, I think the intention is to sit until?  
 5 MR GREANEY: I don't anticipate that we'll be sitting beyond  
 6 5 o'clock, but we might sit until 5 o'clock. My plan is  
 7 to deal with all of the issues relating to Greater  
 8 Manchester Police and then turn tomorrow to deal with  
 9 British Transport Police. If I can reach that point at  
 10 some point around 5 o'clock, then we'll be on track to  
 11 finish.  
 12 SIR JOHN SAUNDERS: I'm sorry if we're sitting longer, but  
 13 everyone understands the importance of getting to  
 14 a stage of concluding the expert evidence by the end of  
 15 this week.  
 16 MR GREANEY: Sir, we have to conclude these witnesses by the  
 17 end of Friday because it will be impossible for the  
 18 three of them to return to Monday.  
 19 SIR JOHN SAUNDERS: Right. Thank you.  
 20 MR GREANEY: Moreover, if they were to do so, that would be  
 21 disruptive to the timetable.  
 22 SIR JOHN SAUNDERS: Quite. Okay, 2 o'clock.  
 23 (1.02 pm)  
 24 (The lunch adjournment)  
 25 (2.00 pm)

71

1 MR GREANEY: Sir, good afternoon.  
 2 Mr Wilson, we're going to turn in a moment to the  
 3 issues of plans and exercising, and again the focus will  
 4 be upon Greater Manchester Police, but along the way it  
 5 will be convenient to deal with a small number of points  
 6 relating to British Transport Police before we focus  
 7 more upon that organisation tomorrow morning.  
 8 First of all, I'm keen to receive your evidence on  
 9 the approach that ought to be adopted in relation to  
 10 planning and exercising. Does there exist, and did  
 11 there exist in May of 2017, something that was known as  
 12 the emergency planning cycle?  
 13 SCOTT WILSON: Yes, there was.  
 14 Q. There is a diagram within your first report that  
 15 illustrates this. I'm going to ask that Mr Lopez place  
 16 that on to the screen, please. It's going to be the top  
 17 half of this page only, please. It's your overview  
 18 report, {INQ024271/146}.  
 19 SCOTT WILSON: If I could add, Mr Dickinson was the chapter  
 20 lead for planning as a whole, where I was more CT  
 21 planning and CT exercising.  
 22 Q. That's very helpful. I'll direct my questions then to  
 23 Mr Dickinson, although I don't think that they'll be  
 24 particularly controversial.  
 25 Is this, Mr Dickinson, a diagram or a figure that

72

1 illustrates the emergency planning cycle?  
 2 IAN DICKINSON: Yes, sir.  
 3 Q. Is this a cycle or an approach that ought to be applied  
 4 by the Local Resilience Forum?  
 5 IAN DICKINSON: Yes, it is, and it's a commonly applied  
 6 mechanism.  
 7 Q. Should it be applied not only by the Local Resilience  
 8 Forum but also by individual police forces?  
 9 IAN DICKINSON: Yes.  
 10 Q. And what about other emergency services too?  
 11 IAN DICKINSON: It's commonly adopted throughout the  
 12 emergency services network.  
 13 Q. We can see the cycle is divided into five parts: plan,  
 14 train, exercise, review, change. Where should a person  
 15 engaged in this kind of activity start?  
 16 IAN DICKINSON: It starts at 12 o'clock and there's a --  
 17 perhaps I should explain: this is a refined version of  
 18 the rather more complex integrated emergency management  
 19 mechanism. But what is missing from this, really, is  
 20 the stage before plan, which is the risk assessment  
 21 stage, identifying which risks need to be planned for.  
 22 Q. I was hoping that we could avoid looking at your  
 23 figure 4, I think we probably can. So this is a cycle  
 24 that is to be applied once risk has been assessed?  
 25 IAN DICKINSON: Once risk has been identified, then assessed

73

1 and mitigated, the remaining risks after mitigation  
 2 measures are applied are the risks you have to plan for  
 3 in detail.  
 4 Q. First of all, plan, is that correct?  
 5 IAN DICKINSON: Correct.  
 6 Q. Then train?  
 7 IAN DICKINSON: Train your staff to implement the plan or to  
 8 implement the actions required of the plan.  
 9 Q. Exercise?  
 10 IAN DICKINSON: Once people have been trained it's important  
 11 to exercise the plan for a number of reasons which could  
 12 be, for example, first of all, is the plan appropriate,  
 13 will it work? Secondly, will the plan affect the risk  
 14 in the way that you believe it will? Thirdly, perhaps,  
 15 to simply rehearse the people who are taking part in the  
 16 response so that they are familiar with what they should  
 17 be doing.  
 18 Q. So one purpose of carrying out an exercise might be to  
 19 ensure that people with particular roles rehearse that  
 20 role --  
 21 IAN DICKINSON: Yes.  
 22 Q. -- so they know what is to be expected if it happens in  
 23 the real world? But it's apparent from this figure that  
 24 it's not just a rehearsal, an exercise fulfils  
 25 a separate role too?

74

1 IAN DICKINSON: A number of roles. It depends on the  
 2 exercise and the purpose for which it's mounted.  
 3 Q. Does "review" mean that, leaving rehearsal to one side,  
 4 it's important that those who have conducted the  
 5 exercise should review what has come out of it?  
 6 IAN DICKINSON: Yes. Each exercise typically has a very  
 7 clear stated purpose, expressed as aims and objectives,  
 8 and in the review phase the specific objectives should  
 9 be looked at closely and reported against.  
 10 Q. Change, what does that indicate?  
 11 IAN DICKINSON: Once we have identified issues that emerge  
 12 from an exercise, they should be assessed to see how  
 13 those matters can be improved or put right. Usually  
 14 that may involve organisational change.  
 15 Q. So this is the concept that we've explored with many  
 16 witnesses, that you have to identify the lessons from  
 17 a particular exercise?  
 18 IAN DICKINSON: Yes.  
 19 Q. But there's no point doing that unless you implement the  
 20 change that those lessons require?  
 21 IAN DICKINSON: And you actively manage the process of  
 22 identifying lessons that could be learnt and carrying  
 23 those through to organisational change.  
 24 Q. In your first report, as far as the INQ reference is  
 25 concerned, at page 31 {INQ024271/31}, you say there are

75

1 three primary stages to this process.  
 2 IAN DICKINSON: Sorry, could you familiarise me with where  
 3 we are?  
 4 Q. First of all, I'm at page 31 of your first report. This  
 5 is the numbering in the bottom right-hand corner. It's  
 6 paragraph 2.13.  
 7 The heading is "Three stages of activity". It's  
 8 immediately beneath the figure that we still have on the  
 9 screen:  
 10 "The primary three-stage process in planning for  
 11 emergencies applied by LRFs..."  
 12 Pausing for a moment, also by other emergency  
 13 responders:  
 14 "... is therefore to develop plans..."  
 15 IAN DICKINSON: Yes.  
 16 Q. "... including protocols, agreement and policy"?  
 17 IAN DICKINSON: Yes, indeed.  
 18 Q. And:  
 19 "Develop capability in terms of equipment and  
 20 resources"?  
 21 IAN DICKINSON: Yes. The plan responds to the threat or the  
 22 risk. Once the plan is identified, then organisations  
 23 equip themselves to implement the plan and that includes  
 24 the development of capability and capacity.  
 25 Q. Then:

76

1 "Training of people who implement the plan, which  
 2 involves understanding the purpose and application of  
 3 the plan and developing familiarity and understanding of  
 4 what is required."  
 5 IAN DICKINSON: Yes, indeed.  
 6 Q. This is probably obvious, but it's obviously important  
 7 that where a plan has been devised, those who will have  
 8 a role under the plan should know that the plan exists?  
 9 IAN DICKINSON: Yes, in broad terms. I'm equivocating  
 10 a little because if you have 500 police officers  
 11 involved in an emergency response to, say, a major  
 12 incident, I wouldn't expect each individual officer to  
 13 understand the plan, only that there is a plan.  
 14 Q. Yes. As a starting point, you'd expect them to know  
 15 that a plan exists?  
 16 IAN DICKINSON: Yes.  
 17 Q. And those with, let me qualify the question,  
 18 an important role under that plan, you would expect them  
 19 to be familiar with --  
 20 IAN DICKINSON: Most certainly.  
 21 Q. -- what it required?  
 22 So:  
 23 "Training of people to implement the plans, to  
 24 understand the application of plan, and develop  
 25 familiarity and understanding of what is required."

1 And then the next stage:  
 2 "Exercises to: (a) deliberately test or validate the  
 3 plans."  
 4 What does that mean?  
 5 IAN DICKINSON: It means that at the beginning of the  
 6 planning cycle, identifying a risk and then producing  
 7 a plan to address that risk, one cannot assume the plan  
 8 is going to be fully effective or accurate. So one of  
 9 the stages in the planning cycle is to deliberately test  
 10 the plan to see if it achieves the effect that is  
 11 desired.  
 12 Q. (b):  
 13 "Provide an opportunity for staff to develop  
 14 competence and rehearse activity", as you explained.  
 15 IAN DICKINSON: Yes.  
 16 Q. And (c):  
 17 "To evaluate the adequacy of established capability  
 18 and integration of agencies' effort."  
 19 What does that mean?  
 20 IAN DICKINSON: It means that the capability and capacity  
 21 which were developed in order to deliver the plan -- are  
 22 those people working together, both inside an agency and  
 23 between agencies? It needs to be tried and tested --  
 24 and tried and tested in this context means: let's iron  
 25 out any difficulty before it has to be implemented in

1 a real situation .  
 2 Q. So now understanding the approach that ought to be  
 3 adopted, let's consider what actually happened on the  
 4 ground.  
 5 So plans -- and, first of all, I would like to deal  
 6 with the issue of generic major incident plans.  
 7 IAN DICKINSON: Yes.  
 8 Q. Mr Dickinson, again I think these are issues for you to  
 9 deal with in the first instance.  
 10 Did Greater Manchester Police have a major incident  
 11 plan?  
 12 IAN DICKINSON: Greater Manchester Police did and so did the  
 13 Resilience Forum.  
 14 Q. Were those documents fit for purpose?  
 15 IAN DICKINSON: Very largely, yes, but with some caveats.  
 16 Q. But in general terms, you'd accept that GMP's major  
 17 incident plan was fit for purpose?  
 18 IAN DICKINSON: Yes.  
 19 Q. I said we would deal with some aspects of BTP. Did  
 20 British Transport Police also have a generic major  
 21 incident plan?  
 22 IAN DICKINSON: I wouldn't call it generic, it was their  
 23 specific major incident arrangement. They are not part,  
 24 really, of the LRF generic planning cycle because they  
 25 have such a wide remit.

1 Q. But they had a major incident plan?  
 2 IAN DICKINSON: They described it as a major incident  
 3 manual. It was produced in 2011, and was out of date by  
 4 the time that the attack happened, though their  
 5 replacement for that plan was in the process of being  
 6 produced.  
 7 Q. The version that was in existence at the time, was that  
 8 fit for purpose in your view?  
 9 IAN DICKINSON: It was fit for purpose at the time that it  
 10 was written, though it had significant omissions,  
 11 largely built around JESIP, because JESIP was not in  
 12 place when the manual was put together in 2011. But  
 13 would it have worked if it had been applied? Yes,  
 14 it would.  
 15 Q. The next issue, and an important one, relates to  
 16 site-specific plans. Did Greater Manchester Police have  
 17 a site-specific plan for Manchester Arena?  
 18 IAN DICKINSON: Yes, they did.  
 19 Q. Was it out of date?  
 20 IAN DICKINSON: It was, sir, yes.  
 21 Q. And was it of relevance or irrelevance therefore?  
 22 IAN DICKINSON: It was an important plan even though GMP did  
 23 not have any obligation to produce one for that location  
 24 because the location was the responsibility of BTP.  
 25 Q. I'm going to ask you about that in a moment. Have you

1 identified evidence of the site—specific plan of GMP  
 2 being used on the night of the attack?  
 3 IAN DICKINSON: Only in two cases. In most cases the  
 4 evidence that we've heard in oral hearing is that  
 5 officers were not aware of the detail of the plan.  
 6 Mr Nawaz, I believe, printed it out, so he certainly had  
 7 access to it.  
 8 Q. Did British Transport Police have a site—specific plan  
 9 for Manchester Arena?  
 10 IAN DICKINSON: No, they didn't. They told us that they  
 11 relied on the Network Rail emergency plan for the  
 12 station complex.  
 13 Q. Were you, from your position as experts, surprised that  
 14 BTP did not have a site—specific plan?  
 15 IAN DICKINSON: Yes, it was somewhat of a surprise when we  
 16 listened to the evidence of Mr O'Callaghan when he said  
 17 that BTP did not maintain any site—specific plans, if  
 18 we were understanding what he said correctly.  
 19 Q. Do you regard that as an acceptable or unacceptable  
 20 position?  
 21 IAN DICKINSON: We find it a strange position, particularly  
 22 where we look at the emergency planning cycle of  
 23 identifying risk and planning to meet that risk. There  
 24 is a clear and apparent risk arising from locations of  
 25 mass public entertainment, like the arena. And as BTP

1 were responsible for that area, it's surprising that  
 2 they had not addressed the risk and the need for  
 3 planning in a structured way.  
 4 Q. Against that background, and before we explore it in  
 5 more detail, what is the value of site—specific plans  
 6 for a venue such as the arena?  
 7 IAN DICKINSON: If I could explain that the generic plans  
 8 that we have talked about are the agency—specific major  
 9 incident plans, they are plans which can be applied to  
 10 any major incident, wherever it should take place and  
 11 whatever the nature.  
 12 The value of a site—specific plan is trying to get  
 13 ahead slightly of the need to implement a plan from  
 14 a standing start to consider for locations where there's  
 15 an increased risk of a major incident or a major  
 16 emergency occurring, then much of the site—specific  
 17 information is drawn together in advance so that it can  
 18 be applied more quickly and more accurately.  
 19 Q. So here, as we all know, in the arena, we have an  
 20 entertainment venue which is capable of hosting  
 21 thousands of people.  
 22 IAN DICKINSON: I think it was 14,000 on the night and it  
 23 was capable of holding many more thousands.  
 24 Q. Yes. Something approaching 20,000. And moreover, it is  
 25 above a major transport hub in a major city?

1 IAN DICKINSON: And it's a very complicated site.  
 2 Q. So in simple terms, and we'll turn in a moment to look  
 3 at whether it should have been joint or separate, is it  
 4 your view that both GMP and BTP should have had  
 5 a site—specific plan that was up to date for the arena?  
 6 IAN DICKINSON: Certainly for BTP that's a clear  
 7 responsibility, in my view, which I think was not met.  
 8 GMP, to their credit, being the organisation which  
 9 surrounds that site, had decided that they ought to have  
 10 a site—specific plan because in the nature of a major  
 11 emergency at that location, it was inevitable that GMP  
 12 would be the primary responding agency for police, so  
 13 they had developed their own major incident plan. We  
 14 don't know what their motivation was, but we surmise  
 15 that's why they did it.  
 16 Q. There are obviously different ways in which this issue  
 17 might be addressed by the emergency services. One  
 18 is that each emergency service should have its own  
 19 site—specific plan for its own purposes. Another  
 20 approach is that there should be a single joint  
 21 site—specific plan across all three emergency services.  
 22 IAN DICKINSON: Yes, that's the case. As a group, we are  
 23 very supportive of the fact that GMP had developed  
 24 a site—specific plan and that they had made attempts to  
 25 make it a multi—agency plan. But we do recognise the

1 needs of the Fire Service, for example, to have a rather  
 2 different plan because, of course, if the building is on  
 3 fire, then they have very specific planning needs and  
 4 requirements which are not common to the police service.  
 5 But having a joint plan for an area of significant  
 6 risk brings real advantages, for example, in a very  
 7 simple way: we all agree in advance that we will host  
 8 the forward command post in these locations; this is  
 9 where you can get access to the control room for the  
 10 site, where there are radio communications and CCTV  
 11 monitoring, for example; these are the lines of  
 12 approach; here are some useful cordon locations; that  
 13 sort of common information that is the same irrespective  
 14 of the nature of the emergency.  
 15 Q. So in relation to any site such as the arena, there is  
 16 going to be some information which is going to be of use  
 17 to each of the emergency services?  
 18 IAN DICKINSON: Yes.  
 19 Q. Even if there might be separate information of  
 20 importance only to one or two of them?  
 21 IAN DICKINSON: That's the case, yes.  
 22 Q. So are you saying to us that you consider that it would  
 23 have been good practice for there to have been a joint  
 24 site—specific plan across the three emergency services  
 25 in relation to Manchester Arena?

1 IAN DICKINSON: Yes, and that's now the case, we understand.  
 2 Q. Whose responsibility -- and obviously this is an issue  
 3 which might arise not just in relation to the arena but  
 4 other locations across Greater Manchester and other  
 5 locations across the country. Whose responsibility  
 6 should it be to create joint site-specific plans  
 7 in relation to venues such as the arena?  
 8 IAN DICKINSON: If I answer that question in pure terms,  
 9 it would be the LRF because they would drive the need to  
 10 identify areas of risk and then produce a plan to meet  
 11 that risk.  
 12 Equally, we've seen it in a number of places where  
 13 it is driven by a particular individual service or, in  
 14 Manchester, driven by the police, so GMP, to provide  
 15 that multi-agency plan. Personally, I can see the  
 16 responsibility lying best with the LRF.  
 17 Q. Well, the danger, do you agree, with saying the  
 18 responsibility might be with the LRF, it might be with  
 19 the police, it might be with another emergency service,  
 20 is that there might not be clarity between the  
 21 organisations about who is actually going to do it?  
 22 IAN DICKINSON: That's true, but depending on where you are  
 23 in the country there's largely agreement -- I don't see  
 24 areas of disagreement. The important thing is that  
 25 whatever arrangement the local LRF or local agencies

85

1 come to, the most important thing is that it works  
 2 rather than being prescriptive.  
 3 SIR JOHN SAUNDERS: There needs to be some sort of forum  
 4 from which a discussion about whether it has been done  
 5 and, if it is going to be done, what sort of plan it is  
 6 and who's going to do it, so the LRF would appear to be  
 7 the obvious place to have that discussion?  
 8 IAN DICKINSON: We agree.  
 9 MR GREANEY: So at the very least the discussion ought to  
 10 take place with the LRF to identify who is going to do  
 11 it? Your view is that often it would be the case that  
 12 the LRF may be the right organisation to actually carry  
 13 out the site-specific planning?  
 14 IAN DICKINSON: We think that would be very valuable and it  
 15 also seems to offer best value for money in that there  
 16 is one process of evaluation of a risk and the  
 17 development of a plan to respond to it rather than three  
 18 or perhaps four.  
 19 Q. So again, this is another issue that, no doubt, the  
 20 chairman will want to bear in mind in considering what  
 21 recommendations should be made in relation to local  
 22 resilience forums?  
 23 IAN DICKINSON: I would hope so, sir, yes.  
 24 Q. And I don't know, did you see the evidence of the  
 25 ambulance experts, Mr Herriot and Mr Cooper?

86

1 IAN DICKINSON: Yes.  
 2 Q. And you will have no doubt have noted that they share  
 3 your view that the LRF has a role to play in terms of  
 4 site-specific plans?  
 5 IAN DICKINSON: Yes, sir.  
 6 Q. By what means should the LRF or the police, if they are  
 7 doing it, identify which sites need a site-specific  
 8 plan, because it will not be every location, will it?  
 9 IAN DICKINSON: No. The very core of the LRF purpose and  
 10 the duties of the category 1 responders -- and I say  
 11 duties in law -- are to assess the risks present in  
 12 an LRF area. That's the starting point of the LRF  
 13 identification of both generic risk and specific risk  
 14 arising from particular locations.  
 15 Q. So the LRF identify which sites require a site-specific  
 16 plan and then either they prepare the plan themselves or  
 17 they facilitate the preparation of the plan by one of  
 18 their members?  
 19 IAN DICKINSON: Yes, sir.  
 20 Q. That's how it ought to work?  
 21 IAN DICKINSON: It is, yes.  
 22 Q. If there had been an up-to-date joint site-specific plan  
 23 for the arena in existence on 22 May 2017, what  
 24 difference, if any, would it have made?  
 25 IAN DICKINSON: That's a difficult question to answer

87

1 because we don't know if a plan would be accessible and  
 2 known about by the individual responders. I'll describe  
 3 the ideal.  
 4 SIR JOHN SAUNDERS: There's not much point in having one  
 5 which isn't known and accessible to the responders?  
 6 IAN DICKINSON: Indeed, sir.  
 7 SIR JOHN SAUNDERS: So let's assume that would take place.  
 8 IAN DICKINSON: If it was accessible and known about and  
 9 immediately implemented, then it certainly would have  
 10 made a big difference to the response. But I should add  
 11 something here, sir, I think. There were a number of  
 12 plans in place, as I explained, in GMP and the LRF: the  
 13 LRF generic major incident plan, the GMP major incident  
 14 plan, there were also action cards and Operation Plato,  
 15 the response to the MTFA. Our collective view is, if  
 16 those plans had been put in place, activated, and used  
 17 as they were intended, we believe the response to this  
 18 emergency wouldn't have resulted in a public inquiry but  
 19 it would have been exemplary because the plans were good  
 20 plans, they were appropriate plans, and if they had been  
 21 implemented, the response would have been equally good.  
 22 MR GREANEY: Just back to the issue of what difference,  
 23 bearing all that in mind, an up-to-date site-specific  
 24 plan, a joint one, would have made on the night, it's  
 25 obviously important in answering that question that we

88

1 should have an idea of what would be within it. The  
 2 ambulance experts anticipated that there might be within  
 3 such a plan pre-nominated rendezvous points.  
 4 IAN DICKINSON: Yes. Pre-nominated options for rendezvous  
 5 points, for forward command posts and for cordon lines,  
 6 lines of approach, red routes, that sort of thing.  
 7 Q. As we know, one of the significant difficulties that  
 8 developed on the night was the rejection by Mr Berry of  
 9 the Fire and Rescue Service of cathedral park as the  
 10 RVP. If there had been in existence a site-specific  
 11 plan that identified options, would you have expected  
 12 that difficulty to have been avoided?  
 13 IAN DICKINSON: I think it would have moved a great deal of  
 14 pace towards avoiding the difficulty, but I've got to  
 15 say that Mr Berry would also be entitled to assess the  
 16 value of that RVP on the night against the information  
 17 that he held at that point. It isn't a -- it must never  
 18 be an automatic "It says in the plan, therefore we do".  
 19 There must be an option for commanders to assess the  
 20 plan against the circumstances at the time and make an  
 21 alternative judgement.  
 22 Q. You know that on the night there were, at various points  
 23 in time, different rendezvous points suggested, were  
 24 there not?  
 25 IAN DICKINSON: There were, there were seven, we believe.

1 Q. Certainly six or seven in total, which sounds like an  
 2 unsatisfactory state of affairs, do you agree?  
 3 IAN DICKINSON: Wholly unsatisfactory.  
 4 Q. And is that the kind of situation that you would expect  
 5 to be avoided, or certainly ameliorated, if there was  
 6 a site-specific plan with options already designated?  
 7 IAN DICKINSON: It would certainly assist substantially.  
 8 SIR JOHN SAUNDERS: It doesn't cover the problem, does it,  
 9 if they are all sufficiently close to the arena, for  
 10 Mr Berry to take the view it's simply not safe to have  
 11 one because of the risk of a secondary device?  
 12 IAN DICKINSON: It's very difficult to avoid that question,  
 13 sir, and I don't think there's any way to do so other  
 14 than to say -- and again I'm going back to JESIP -- the  
 15 basic principle of JESIP is get together, share  
 16 information, share risk and make agreements about what  
 17 is going to happen.  
 18 If it is something that's already set down in a plan  
 19 to say, "This is the location for an FCP", and one  
 20 agency says, "Perhaps we could have it further down the  
 21 road just to be safe", everybody else would probably  
 22 say, "That's not a major issue, we'll go ahead and do  
 23 it", but it presupposes all the commanders are together  
 24 or virtually together, are able to communicate and pass  
 25 information between them.

1 SIR JOHN SAUNDERS: On RVP points, with the ambulance  
 2 expert, he said it would be perfectly open to Mr Berry  
 3 to get back to the FDO, assuming he could talk to him,  
 4 and say, "Look, I'm not very happy about this RVP with  
 5 the threat of another bomb going off, do you think we  
 6 should have one further away?" But if the FDO says, "No  
 7 that's the one we nominate", the ambulance expert's view  
 8 is you go with what the police say because they have to  
 9 take the lead on the RVP.  
 10 IAN DICKINSON: We've thought about this as well, as you can  
 11 imagine. The -- we have not come across a situation in  
 12 our collective experience where there is such  
 13 a fundamental disagreement between tactical or strategic  
 14 commanders that cannot be resolved by adjustments, by  
 15 reaching consensus, by shifting a concern slightly until  
 16 you reach a point, quite quickly, where people are able  
 17 to agree. We find a situation like where Mr Berry was  
 18 in such a situation that he could not even adjust his  
 19 position to be very exceptional.  
 20 SIR JOHN SAUNDERS: He couldn't because he couldn't talk to  
 21 anybody.  
 22 IAN DICKINSON: Indeed. Co-location and exchanges of  
 23 information, sir.  
 24 MR GREANEY: That's the point, isn't it? I do appreciate we  
 25 keep cycling back to the same point, which is your

1 strong view that if there had been communication between  
 2 Mr Berry and someone senior within Greater Manchester  
 3 Police at the relevant time, Mr Berry would have been  
 4 readily satisfied that the cathedral car park was an  
 5 appropriate rendezvous point?  
 6 IAN DICKINSON: We are convinced of that, and indeed that's  
 7 the principle on which the generic major incident plan  
 8 is based.  
 9 Q. So what goes wrong, at the risk of repeating myself,  
 10 is that they never had that communication because they  
 11 never co-locate?  
 12 IAN DICKINSON: That's right. Mr Berry was largely isolated  
 13 from the access to information, which I have no doubt  
 14 we'll get on to later on.  
 15 Q. And the simple fact of the matter, do you agree, is that  
 16 unless that happens, JESIP is incapable of working?  
 17 IAN DICKINSON: I wouldn't go as far as that, sir, but it  
 18 was --  
 19 SIR JOHN SAUNDERS: Sorry to cut across you, please forgive  
 20 me. We went down the line of the whole thing hinging,  
 21 people saying in practice, once you have the RVP point,  
 22 then you all co-locate, then you make your joint  
 23 discussions. If you never get your RVP point agreed,  
 24 then I suppose if the communications are working really  
 25 well, then it might be possible to do without being in



1 the same place, but otherwise you never start to get to  
 2 the same position.  
 3 IAN DICKINSON: That's why those five principles of JESIP  
 4 are written so large in the arrangements.  
 5 SIR JOHN SAUNDERS: But no RVP at this point, which applied  
 6 to everybody, actually, means actually the whole thing  
 7 just fails from the outset?  
 8 IAN DICKINSON: Not inevitably with intelligence and agile  
 9 command, but it increases the risk of that  
 10 substantially.  
 11 MR GREANEY: And that is what happened on the night, isn't  
 12 it?  
 13 IAN DICKINSON: Yes.  
 14 Q. Because that first principle wasn't adhered to, none of  
 15 the others worked?  
 16 IAN DICKINSON: In that one area of response, yes, sir, the  
 17 Fire Service did not get to the scene.  
 18 SCOTT WILSON: It was the communication that failed, so then  
 19 co-location had failed. If Mr Berry had made the  
 20 decision to send another unit to the scene, because his  
 21 plan wasn't working from communication, you would have  
 22 got co-location. Because the communication was failing  
 23 with Mr Berry, co-location then failed because they  
 24 couldn't bring them all together. And I think we've  
 25 said it before: if one plan fails, you don't stick on

93

1 that same plan, you look at another alternative. If he  
 2 can't speak to the FDO, if he can't get his information,  
 3 he then possibly has to send someone else to the scene  
 4 to find out for him what is going on here.  
 5 SIR JOHN SAUNDERS: And as you know we have explored that  
 6 with the fire.  
 7 MR GREANEY: And, as you will appreciate, many witnesses  
 8 have said there came a time at which that certainly  
 9 ought to have been done by Mr Berry.  
 10 SCOTT WILSON: That would have brought co-location together  
 11 very quickly because the first unit that would have got  
 12 there would have realised the situation, it was safer to  
 13 bring other units on board, and you'd have then got  
 14 co-location, coordination and communication.  
 15 SIR JOHN SAUNDERS: There wasn't good co-location between  
 16 the Ambulance Service and the police, was there?  
 17 SCOTT WILSON: No.  
 18 MR GREANEY: Thank you, Mr Dickinson, for assisting  
 19 in relation to site specific plans.  
 20 I next want to explore with you an issue which may  
 21 be connected and it relates to something the ambulance  
 22 experts told us about, namely a PDA or predetermined  
 23 attendance. Is a PDA a concept that is known within  
 24 policing?  
 25 IAN DICKINSON: To a limited degree, sir, but not

94

1 substantially.  
 2 Q. You're going to have to explain that in a bit more  
 3 detail. To what limited degree is the PDA understood  
 4 within policing?  
 5 IAN DICKINSON: In the major incident plans for GMP, for  
 6 example, at the back of the plan there's a number of  
 7 appendices. The appendices are effectively action cards  
 8 in the common parlance of the inquiry. For example: the  
 9 Silver commander will do this, Bronze commander will do  
 10 this, first officer at the scene will do this. So from  
 11 that degree there is a predetermined attendance in that  
 12 if you activate the major incident plan, it presupposes  
 13 that you activate these roles. But the police service,  
 14 with some exceptions, does not work on the basis of: if  
 15 there is a burglary in progress, you must dispatch four  
 16 officers to this location.  
 17 Q. No.  
 18 IAN DICKINSON: It depends on the availability of the staff  
 19 and it depends very much on the information that  
 20 you have available.  
 21 Q. So the ambulance experts explained to us, and I do  
 22 appreciate that different considerations may arise  
 23 depending on the service, they explained to us the real  
 24 value that they considered a predetermined attendance  
 25 would have had for the Ambulance Service because

95

1 it would have dictated that a particular amount of  
 2 resources went to a particular kind of situation. I've  
 3 explained that very clumsily, but you heard the evidence  
 4 yourself and you'll understand what I mean. Does such  
 5 a thing have any value in your view within policing?  
 6 I appreciate if it's a burglary, it may not be very  
 7 important to dictate who should go there, but one can  
 8 say: if there is an explosion, this is the level of  
 9 resource that we expect to be deployed.  
 10 IAN DICKINSON: If it were included in site-specific plans,  
 11 as it is for example for an airport, then most  
 12 certainly. Airports are much more structured in their  
 13 emergency needs than are, for example, a motorway crash  
 14 or an aircraft crashing in a field. For the most part  
 15 it is something which is decided on the facts of the  
 16 time, but I agree with you, in some cases a limited PDA  
 17 for policing is already in place and it could be useful  
 18 in this case.  
 19 Q. That's all I wanted to ask you about major incident  
 20 plans and about site-specific plans.  
 21 Sir, I'm going to turn to GMP's Plato plans unless  
 22 you have any questions.  
 23 SIR JOHN SAUNDERS: No, thank you.  
 24 MR GREANEY: Mr Sirrell, I think these questions are best  
 25 posed to you in the first instance; is that correct?

96

1 IAIN SIRRELL: They are, yes.  
 2 Q. Plato plans within GMP. Mr Sirrell, do you agree that  
 3 in May of 2017, two different Plato plans seem to have  
 4 been in the thoughts of different officers?  
 5 IAIN SIRRELL: I would absolutely agree.  
 6 Q. By that, I mean that there existed SOP 47, version 5?  
 7 IAIN SIRRELL: That's correct, yes.  
 8 Q. And there existed what we've been calling the  
 9 Whittle plan, which had been circulated on 5 May 2017?  
 10 IAIN SIRRELL: Yes, that's correct.  
 11 Q. Has it struck you, Mr Sirrell, that there was not  
 12 consistency amongst the witnesses in relation to which  
 13 plan they believed was in force?  
 14 IAIN SIRRELL: I have been struck by it, but I wasn't  
 15 surprised by it because of the confusion that the two  
 16 plans have created in my own mind.  
 17 Q. So just to put a little flesh on that, Mr Whittle  
 18 considered that his plan was in force on 22 May.  
 19 IAIN SIRRELL: He did.  
 20 Q. Mr Lear considered similarly that the Whittle plan was  
 21 in force?  
 22 IAIN SIRRELL: He did, yes.  
 23 Q. As did Chief Inspector Booth?  
 24 IAIN SIRRELL: Yes, he did.  
 25 Q. Superintendent Giladi, on the other hand, considered

1 that SOP 47 v5 was in force?  
 2 IAIN SIRRELL: I think that's the case for his evidence, but  
 3 I believe in the statement that he has made subsequent  
 4 to giving evidence, he is now unsure.  
 5 Q. Certainly Mr Sexton told us that he thought he was  
 6 working to SOP 47 v5.  
 7 IAIN SIRRELL: Again, in the written evidence that I've  
 8 seen, he wasn't sure he'd ever seen either plan.  
 9 Q. ACC Ford considered that the Whittle plan was in force.  
 10 And Chief Inspector Dexter, as he was, considered that  
 11 the Whittle plan was in force, albeit he had an  
 12 awareness of both plans.  
 13 IAIN SIRRELL: He did, yes.  
 14 Q. So on the night, it may be the case that the FDO was  
 15 working to one plan and Gold and the ground-assigned  
 16 tactical firearms commander were working to another?  
 17 IAIN SIRRELL: That was certainly the confused position that  
 18 we saw.  
 19 Q. And the answer to this question, again, will be obvious,  
 20 but is what I have just described an acceptable state of  
 21 affairs?  
 22 IAIN SIRRELL: No, sir, it's not.  
 23 Q. Should there always be clarity in relation to which  
 24 policing plan is in force?  
 25 IAIN SIRRELL: I believe that's essential.

1 Q. And how is that to be achieved?  
 2 IAIN SIRRELL: Clearer version control. We've seen,  
 3 certainly on the evidence of Mr Lear, the reason for the  
 4 Firearms Compliance Unit in Greater Manchester Police,  
 5 why that was established, to gain great clarity with  
 6 regards to the plans and purpose of firearms deployments  
 7 within Greater Manchester and to have absolute clarity  
 8 around which plan was in place at a given time is  
 9 essential.  
 10 Q. Whose responsibility is it to ensure that there is such  
 11 clarity in relation to which plan is in force?  
 12 IAIN SIRRELL: Within the force — you certainly had within  
 13 Greater Manchester Police the Firearms Compliance Unit  
 14 and one would suppose that was their role, and then the  
 15 leaders and supervisors within that department, that  
 16 function.  
 17 Q. Do you agree that having different plans and a lack of  
 18 clarity in relation to which is in force is capable of  
 19 causing significant difficulties?  
 20 IAIN SIRRELL: I think when we look at the plans themselves,  
 21 the —  
 22 Q. We'll come to the specifics in a moment, but as  
 23 a general proposition, do you agree that having a lack  
 24 of clarity amongst officers in relation to which plan is  
 25 in force is capable of causing real difficulties?

1 IAIN SIRRELL: I do agree with that, yes, and certainly in  
 2 discussion, we discussed that in some detail and  
 3 we would all agree.  
 4 Q. I'm asked if you can speak up. The problem is the  
 5 perspex. Can I check, can people at the back hear?  
 6 It's the stenographer who's having a difficulty, so it's  
 7 important to speak up.  
 8 So as a general proposition, this may be  
 9 self-evident, you are creating a risk, if you lack that  
 10 level of clarity?  
 11 IAIN SIRRELL: Yes, sir, you are.  
 12 Q. So am I right that a lesson that needs to be learned  
 13 from the events in May 2017 is that that kind of  
 14 situation must never occur again?  
 15 IAIN SIRRELL: It should not, no.  
 16 Q. But to turn to the question that you were beginning to  
 17 answer, do you consider that the lack of clarity  
 18 in relation to the Plato plan made any difference on the  
 19 night?  
 20 IAIN SIRRELL: I think how it was applied, both of the  
 21 plans, with the exception of the position in relation to  
 22 the FDO, both the plans were broadly similar. And as we  
 23 saw with Mr Dexter and his evidence, he essentially had  
 24 both plans in his mind as he was applying his duties, so  
 25 both of the plans would work.

1 Q. So I believe what you're telling us is that the core of  
 2 each plan was similar?  
 3 IAIN SIRRELL: It was, yes.  
 4 Q. And that in fact, on the night, the lack of clarity did  
 5 not, in your view, make any difference to the response?  
 6 IAIN SIRRELL: It didn't.  
 7 Q. Obviously, as you'll appreciate, we're going to come  
 8 back to the role of the FDO in accordance with the  
 9 plans, but I'm going to turn next to deal with the topic  
 10 of exercising. Mr Dickinson, I think that these are  
 11 questions which are best posed to you; is that correct?  
 12 IAN DICKINSON: Please do, yes.  
 13 Q. Again, I'm going to ask you if you could keep your voice  
 14 up. This is an unsatisfactory arrangement, but you'll  
 15 appreciate that it's necessary.  
 16 Did the Greater Manchester Resilience Forum engage  
 17 adequately with the issue of exercising?  
 18 IAN DICKINSON: It did, sir, indeed. One might say it was  
 19 exceeding what we've found in different parts of the  
 20 country.  
 21 Q. Did Greater Manchester Police play a prominent and  
 22 active role in that exercising?  
 23 IAN DICKINSON: They did, sir, and I've got to say, we are  
 24 all surprised to a degree because they maintained that  
 25 commitment in the face of very substantial budget

101

1 reductions.  
 2 Q. I was going to invite you to confirm, as you observe in  
 3 your second report, that GMP dedicated what you regard  
 4 as an appropriate level of time, resource and commitment  
 5 to exercising?  
 6 IAN DICKINSON: Yes, sir.  
 7 Q. During the course of the exercising that was undertaken  
 8 in the 2 years before the arena attack, were lessons  
 9 identified?  
 10 IAN DICKINSON: Lessons were certainly identified and we've  
 11 seen a lot of evidence of that.  
 12 Q. Did that lead, to a degree that you regard as adequate,  
 13 to the implementation of change and organisational  
 14 improvement?  
 15 IAN DICKINSON: It's fair to say that we saw some evidence  
 16 of that, but it was very limited and we could not say  
 17 that GMP did not implement organisational change because  
 18 of exercising, but we can equally not say that it was  
 19 adequately managed and they fulfilled that obligation.  
 20 There was an absence of evidence that that was the case.  
 21 They maintained a lessons tracking mechanism, both GMP  
 22 had one and so did the resilience forum, but we didn't  
 23 see substantial evidence of concrete achievement arising  
 24 from those processes.  
 25 Q. So obviously, in a moment we're going to look at one

102

1 particular example with Mr Wilson, namely Exercise  
 2 Winchester Accord. But what you're describing,  
 3 therefore, is a situation in which the exercising is  
 4 done to a good standard?  
 5 IAN DICKINSON: Yes.  
 6 Q. It fulfils its purposes, one of those being the  
 7 identification of lessons?  
 8 IAN DICKINSON: Yes, depending on the objectives of the  
 9 exercise, sir, yes.  
 10 Q. But there then seems to have been, on many occasions,  
 11 a disconnect between the identification of lessons and  
 12 what ought to occur, namely the implementation of  
 13 change?  
 14 IAN DICKINSON: Yes, sir, that's true, but I think I ought  
 15 to expand a little bit, if I may.  
 16 Q. Please do.  
 17 IAN DICKINSON: For major exercises, a process of debrief  
 18 takes place, involving a model developed by the College  
 19 of Policing, which embraces anybody and all people  
 20 involved in the exercise and gives them a platform and  
 21 an opportunity to speak to identify things that went  
 22 well and things that went badly. The process then  
 23 gradually distills that information to a point where  
 24 a limited number of emerging significant issues are  
 25 identified. Those are then taken forward, in theory, to

103

1 the strategic level of involvement of the participants  
 2 and specific issues to be worked through in order to  
 3 improve the situation of that particular agency.  
 4 Q. This is the review and change phase of the emergency  
 5 planning cycle?  
 6 IAN DICKINSON: Yes, it is. But if I may, ACC Ford brought  
 7 up something which I think is quite pertinent. She said  
 8 that process is very good and very useful and it stood  
 9 the test across the country. What she said, though, was  
 10 there should be a much more rigorous focus on the  
 11 evaluation of the objectives of the exercise, the  
 12 specific objectives, and we agree with her. The reason  
 13 is that the process of -- the College of Policing  
 14 process gathers together information from a wide base  
 15 and distils it down to a small amount of information.  
 16 But that might not be congruent with the objectives of  
 17 the exercise. And the objectives of the exercise should  
 18 be the complete and absolute focus for the point of  
 19 evaluation of value for money. And Mrs Ford's point was  
 20 that that was not taking place, and we agree with that.  
 21 SIR JOHN SAUNDERS: As I understand about Winchester Accord,  
 22 the main objective was the licensing relating to  
 23 armed --  
 24 MR GREANEY: The military.  
 25 SIR JOHN SAUNDERS: Yes.

104

1 IAN DICKINSON: That was one of the — probably the prime  
2 objective, but there were, I think, 70 different  
3 objectives for Winchester Accord.  
4 SIR JOHN SAUNDERS: Which would all be clearly set out?  
5 IAN DICKINSON: Which were all were clearly set out. But if  
6 you look at the debrief process, it was a very open and  
7 generic one, which distilled things, but which did not  
8 necessarily reflect a specific evaluation of the  
9 objectives of the exercise.  
10 SIR JOHN SAUNDERS: Mr Greaney, I wonder if you mind if  
11 I mention this now, otherwise I will forget this.  
12 In relation, I believe, to both fire and ambulance,  
13 I have asked questions or asked for submissions about  
14 the adequacy of the debriefing process.  
15 MR GREANEY: You have.  
16 SIR JOHN SAUNDERS: It may be perfectly understandable that  
17 so much more is coming out of this inquiry because of  
18 the length of time, et cetera, et cetera, but I wonder  
19 whether people will consider, and we can consider with  
20 the police, whether the debriefing system was adequate  
21 and whether the system at the moment actually reveals as  
22 much as it might do and, if not, what the causes of that  
23 are.  
24 MR GREANEY: Sir, I do have very much in mind that that is  
25 a topic that you regard as being important. It is on my

105

1 list to ask these experts about, although I suspect I'll  
2 get to that tomorrow.  
3 SIR JOHN SAUNDERS: That's absolutely fine.  
4 MR GREANEY: They are now informed that that's a topic  
5 they'll be asked for their assistance in respect of.  
6 For the moment, before we get to Winchester Accord,  
7 I want to try to unpack, to use Mr de la Poer's phrase,  
8 some of what you have just said.  
9 At the very beginning of the oral evidence hearings  
10 of this inquiry, during the pen portraits, Mr Roussos  
11 explained to the chairman that essentially he was sick  
12 of people saying that lessons needed to be learned.  
13 Because whilst lessons do need to be learned, there's no  
14 point in learning them unless you then implement change.  
15 IAN DICKINSON: Indeed, and we shouldn't be seeing the same  
16 lessons being identified time and again from real  
17 incidents and exercises.  
18 Q. So just in a few sentences, as clearly as you're able  
19 to, can you explain what was going wrong within Greater  
20 Manchester Police at this time in terms of converting  
21 the identification of lessons into real and meaningful  
22 change? Because just to provide some context, if this  
23 was a problem within Greater Manchester Police, it may  
24 well have been a problem elsewhere and could still be.  
25 IAN DICKINSON: I'm afraid I do not think we can answer that

106

1 question. We do not know why the conversion of lessons  
2 learned into organisational change wasn't taking place.  
3 We can surmise it may be because of the multiple changes  
4 of chief officers. It may have been because of the  
5 considerable pressures of budget reduction or it may  
6 have been because the process wasn't working. We just  
7 don't know. We didn't see evidence of concrete change  
8 emerging from the process, but we don't know why that  
9 disconnect was taking place.  
10 SIR JOHN SAUNDERS: Just talking about lack of finance for  
11 a moment, I don't think I have heard in relation to  
12 anything anyone from the police force saying: yes, we  
13 knew there was a problem but we really couldn't afford  
14 to fix it.  
15 IAN DICKINSON: I don't think it was a case of being able to  
16 afford to fix it as affording the time to explore the  
17 mechanism for fixing it.  
18 MR GREANEY: Sir, I think certainly within firearms training  
19 we heard evidence that the shrinking of that  
20 department —  
21 SIR JOHN SAUNDERS: No, no, absolutely, we did, yes.  
22 MR GREANEY: And also there had been an initiative in which  
23 Mr Dexter had been involved, which was designed to make  
24 plans across GMP shorter and more focused and that  
25 fizzled out again, as I recall, as a result of financial

107

1 considerations.  
2 So in a sense, the fact that you haven't been able  
3 to identify with clarity what was going wrong only makes  
4 the situation more worrying perhaps?  
5 IAN DICKINSON: I wouldn't necessarily agree with you, sir,  
6 purely because we comment on the evidence that we have  
7 been provided with. There may be other evidence and we  
8 find it very difficult to come to a firm conclusion.  
9 Q. I think you misunderstood me. I wasn't intending to  
10 criticise the fact that you have not identified the  
11 reason. What I'm suggesting is that if you can identify  
12 the reason why something is going wrong then you ought  
13 to be able to put in place measures to stop it happening  
14 again, whereas if you haven't even identified why  
15 something is going wrong, it might make it difficult to  
16 cure the problem. Does that make sense as a concept at  
17 least?  
18 IAN DICKINSON: It does, but I'm not sure I can give you  
19 a rational answer.  
20 Q. What you will be, I'm sure, able to help with is how we  
21 ensure that that disconnect does not exist. What needs  
22 to be in place?  
23 IAN DICKINSON: As a result of this inquiry and our  
24 discussion, I think we all agree giving the LRF a role  
25 in identifying these major lessons by specific and, in

108

1 ACC Ford's words, much more rigorous and focused  
 2 evaluation against the objectives is perhaps part of the  
 3 answer.  
 4 Q. Is that solely the job of the LRF or would you expect  
 5 the police force also to be involved in that?  
 6 IAN DICKINSON: I think it's part of the -- the LRF would  
 7 coordinate and it's -- all the agencies, the category 1  
 8 responders of the LRF, should play their part because  
 9 lessons in one agency will undoubtedly have  
 10 a substantial carry-across to others.  
 11 Q. You did along the way of an answer a moment ago mention  
 12 an issue that might just be worth exploring, which is  
 13 the fact that there were changes within Greater  
 14 Manchester Police over this period that we are concerned  
 15 with at a high level. Were you intending to suggest  
 16 in that answer that where a need for change has been  
 17 identified, you need to give the job of making that  
 18 change to someone with the authority to achieve it?  
 19 IAN DICKINSON: That's important, yes.  
 20 Q. Why may that be more difficult if positions are  
 21 changing?  
 22 IAN DICKINSON: Mr Wilson did some research to identify how  
 23 many times a particular postholder changed, the  
 24 postholder who was particularly involved in the area  
 25 we're talking about, and it was certainly clear that it

109

1 was difficult for successive postholders to pick up the  
 2 same level of focus, of commitment and of ability to  
 3 actively manage particular items in their portfolio,  
 4 some of which would be organisational change arising  
 5 from exercises.  
 6 SCOTT WILSON: If I can use an example, as national  
 7 coordinator one of my jobs was to link into the CT  
 8 heads --  
 9 SIR JOHN SAUNDERS: I think you may be the person who needs  
 10 to slow down slightly, if you don't mind. Someone needs  
 11 to make a note of what you're saying.  
 12 SCOTT WILSON: To link into the assistant chief constables  
 13 in the regions and to link into CT heads. If I give the  
 14 example of my 4 years in post within West Midlands, I  
 15 had links into one ACC for that period. For  
 16 Police Scotland, one ACC for that complete period.  
 17 PSNI, one ACC.  
 18 Between 2015 and 2017, there were certainly four  
 19 ACCs within Greater Manchester. We know ACC Ford,  
 20 Sutcliffe, ACC Haywood and then eventually on the night  
 21 it would have been ACC Jackson.  
 22 If I were to go back to the four-year period,  
 23 I would guess somewhere between six and eight ACCs sat  
 24 in that portfolio seat, looking after CT -- not the CT  
 25 head.

110

1 So there has to be something looked at there,  
 2 whether that was development within Greater Manchester,  
 3 moving people about, I know there was other issues that  
 4 brought about that, but that cannot be great for any  
 5 organisational learning getting pushed forward because  
 6 when you pass a portfolio to someone else, it might not  
 7 always be their number one to push that forward, they  
 8 might have another agenda, and that can be difficult.  
 9 SIR JOHN SAUNDERS: There's a limit to what you can do  
 10 thigh, isn't there, because as I recall some of the ACCs  
 11 actually moved on to other jobs with different police  
 12 forces.  
 13 SCOTT WILSON: Yes.  
 14 MR GREANEY: At all events, that was or at least was capable  
 15 of being one of the problems?  
 16 SCOTT WILSON: I think certainly if there was this  
 17 changeover all the time -- I think I gave an example  
 18 yesterday in London when Lord Toby Harris carried out  
 19 a review into preparedness in London and an assistant  
 20 commissioner, equivalent to a chief constable, and  
 21 a superintendent pushed up from beginning to end, and  
 22 the majority, if not all, of those recommendations were  
 23 landed because you had someone with the authority in  
 24 a chief constable pushing those. But if they're getting  
 25 moved about from one area to another and different

111

1 officers, it's very, very difficult sometimes to keep  
 2 focus on what is important.  
 3 So I know that if I was speaking to West Midlands,  
 4 for instance, I can speak to one person and I can speak  
 5 about that exercise because that ACC in West Midlands  
 6 will know what the exercise is about. In certain forces  
 7 if I was speaking to them, they might have moved on  
 8 three or four times and they would have no knowledge of  
 9 a certain exercise that happened 2 years ago, which can  
 10 make it very difficult.  
 11 Q. So as the chairman has said, there's only a certain  
 12 degree to which this can be controlled because there may  
 13 be good reasons for people to move jobs or even to move  
 14 forces. But I believe what the three of you are saying  
 15 to the chairman is that there needs to be an entirely  
 16 rigorous identification of what change is indicated?  
 17 SCOTT WILSON: Yes.  
 18 Q. That the job of making that change then needs to be  
 19 given to someone with authority to make the change?  
 20 SCOTT WILSON: A responsible person, yes.  
 21 Q. And so far as at all possible, there needs to be  
 22 consistency in the sense that that person sticks with  
 23 that job until it's done?  
 24 SCOTT WILSON: Yes. I think it needs a support mechanism  
 25 behind making that change happen as well. I don't know

112

1 if it's convenient to talk about Winchester Accord  
 2 in that piece, where -- Winchester Accord was a very  
 3 large exercise, but it was a tier 3 exercise, so after  
 4 the exercise had taken place certainly there wouldn't  
 5 have been the same support behind that exercise to push  
 6 change forward as there would have been in a tier 1  
 7 exercise.  
 8 Q. These are terms that certainly I'm not entirely familiar  
 9 with. When you say a tier 3 exercise, what are you  
 10 referring to?  
 11 SCOTT WILSON: If I can explain what a tier 1 exercise is.  
 12 A tier 1 exercise is an exercise that -- in that period,  
 13 it's changed -- in that period of 2015 to 2017, a tier 1  
 14 exercise would be an exercise that was sanctioned by the  
 15 OSCT within the Home Office. A region would be asked to  
 16 deliver that exercise, that could be London, Wales,  
 17 North-west. It would be supported by the Home Office,  
 18 it would be supported by my office, National (inaudible)  
 19 it would be supported by the ODU --  
 20 Q. You're probably getting a little bit fast again and this  
 21 sounds important, so take it at a slightly slower pace.  
 22 SCOTT WILSON: It would have the support of that.  
 23 A nominated chief officer from the region would also  
 24 look after that tier 1. When we talk about tier 1, that  
 25 is from the first PC turning up on the scene of the

1 incident to the Prime Minister sitting in COBR later  
 2 that day. It's quite unique that it goes from the  
 3 incident taking place through the full mechanism of  
 4 response, through to how Scotland Yard works, from  
 5 NaCTSO's role and the SNC's role, to how COBR works, and  
 6 that's what a tier 1 exercise does: it takes it from one  
 7 end to the other over a two- or three-day period. At  
 8 the end of that exercise, a large report is then  
 9 submitted to the Home Secretary saying how match fit is  
 10 CT Policing. But there's a lot of officers and a lot of  
 11 support behind that.  
 12 If we look at a tier 3 exercise, which is a regional  
 13 exercise which Winchester Accord was, Winchester Accord  
 14 would have been supported -- my view was  
 15 Winchester Accord was probably too large for a tier 3  
 16 exercise with 800 participants, but that would be down  
 17 to the region to decide how big that exercise was going  
 18 to be.  
 19 A very well-planned exercise in a lot of ways, but  
 20 when everyone walked away from the exercise, there  
 21 wouldn't have been that same support mechanism you would  
 22 have had with a tier 1, where you would have had a large  
 23 department within the Home Office, officers within my  
 24 office, officers within the ODU pushing recommendations  
 25 through which are then going to go and report to the

1 Home Secretary.  
 2 I will guarantee with Winchester Accord it was  
 3 probably a number of officers that were left with  
 4 what was left to turn into business as usual and I think  
 5 that was probably where one of the failures can be seen.  
 6 Q. From the description you've given of a tier 1 exercise,  
 7 not all exercises can be a tier 1 exercise because of  
 8 the burden that that would, for example, place on --  
 9 SCOTT WILSON: One a year. During that period there would  
 10 be one tier 1 a year which would go round, so every  
 11 other year a different region, so in 2014 it was in  
 12 Wales, 2015 it was in London, 2017 it was in the  
 13 North-east. So it goes round the country.  
 14 Q. I do want to look more closely at Winchester Accord in  
 15 a moment, but you have said that the difference between  
 16 tier 1 and 3 is the support mechanism which is in place  
 17 once the exercise is over.  
 18 SCOTT WILSON: Yes.  
 19 Q. So what is to be done to ensure that there is more of  
 20 a support network in place at the end of a tier 3  
 21 exercise such as Exercise Winchester Accord?  
 22 SCOTT WILSON: I think that's pulling together the  
 23 resilience forum with the other -- the emergency  
 24 planning departments within fire, ambulance and police  
 25 and making sure there's a team who are going to push

1 that change forward. Leaving it to one or two officers  
 2 within a planning unit and then the system moves on is  
 3 never going to push those recommendations through.  
 4 Q. So again, it sounds as if your view is the Local  
 5 Resilience Forum has a critical role to play in ensuring  
 6 that lessons are learned and change made?  
 7 SCOTT WILSON: Definitely.  
 8 Q. Shall we deal with Exercise Winchester Accord, which  
 9 obviously we're all now very familiar with. I'm in your  
 10 second report, the report in which you assess  
 11 preparedness and response. It's page 94 of the report;  
 12 the number in the bottom right-hand corner is 97  
 13 {INQ035309/97}.  
 14 You observe, Mr Wilson:  
 15 "Exercise Winchester Accord formed part of an  
 16 existing biannual programme of national exercises  
 17 facilitated by the ODU of Counter-terrorism Policing and  
 18 it sought to advance knowledge and experience in dealing  
 19 with an MTFA incident and test and exercise  
 20 organisational plans."  
 21 SCOTT WILSON: Yes.  
 22 Q. In your paragraph 5.10.3, you digest the critical  
 23 features that emerged out of the College of Policing  
 24 debrief document, did you not?  
 25 SCOTT WILSON: That is correct, sir, yes.

1 Q. I'll just list those:  
 2 "(a) A lack of police tactical command and presence  
 3 at the forward command post?"  
 4 SCOTT WILSON: Yes.  
 5 Q. "(b) A lack of communication with teams on the ground?"  
 6 SCOTT WILSON: That's correct.  
 7 Q. "(c) An inability to make contact with the GMP force  
 8 duty officer?"  
 9 SCOTT WILSON: That's correct.  
 10 Q. "(d) Additional support for the FDO would have helped?"  
 11 SCOTT WILSON: Correct.  
 12 Q. "(e) Confusion between the tactical firearms commander,  
 13 the TFC, and the ground-assigned tactical firearms  
 14 commander (the GATFC) over command?"  
 15 SCOTT WILSON: That's correct.  
 16 Q. "(f) A delay in declaring the warm zone?"  
 17 SCOTT WILSON: Correct.  
 18 Q. "(g) Low awareness of terminology in the operational  
 19 control room (the OCR)?"  
 20 SCOTT WILSON: Yes.  
 21 SIR JOHN SAUNDERS: Are those the exact words used in the  
 22 College of Policing debrief document?  
 23 SCOTT WILSON: Yes, sir.  
 24 SIR JOHN SAUNDERS: I just wasn't sure how much there was  
 25 a dispute with GMP, from GMP now as to whether those

117

1 conclusions were correct and whether they were part of  
 2 the debrief or not.  
 3 MR GREANEY: There certainly was, sir, an issue about that  
 4 at one stage, you're quite right, and we will look  
 5 forward with interest to what Mr Horwell has to say  
 6 about this tomorrow, no doubt.  
 7 Working on the basis that these were issues that  
 8 emerged out of Winchester Accord and were issues which  
 9 were known about, do you agree that some, if not many,  
 10 of these bear an uncanny resemblance to what was to go  
 11 wrong almost exactly a year later?  
 12 SCOTT WILSON: It all happened on the night of 22 May.  
 13 SIR JOHN SAUNDERS: (d) is quite interestingly termed:  
 14 "Additional support for the FDO would have helped."  
 15 And we do understand this was being trialled by  
 16 putting the FDO in police headquarters where he didn't  
 17 have around him the sort of support he had elsewhere,  
 18 which seems to have slightly muddled the water?  
 19 SCOTT WILSON: That's correct, sir, yes.  
 20 MR GREANEY: I'm going to invite you to agree that the  
 21 position was set out very starkly indeed in the North  
 22 West Ambulance Service debrief document. Mr Lopez,  
 23 could we see this? {INQ013669/1}.  
 24 I'm sure you will agree with the qualification the  
 25 chairman just indicated that GMP would no doubt wish the

118

1 point to be made that the FDO role was being tested in  
 2 a situation that was different to that which existed on  
 3 the night.  
 4 SCOTT WILSON: Yes.  
 5 Q. Can we enlarge the top half of that page? As  
 6 I indicated, this is the NWAS debrief document:  
 7 "Huge delay in tri-service meeting out of line with  
 8 JESIP. Lack of direct police on-site liaison with  
 9 ambulance/Fire and Rescue Service."  
 10 And then this:  
 11 "Huge delay in deployment of ambulance/Fire and  
 12 Rescue Service to triage and treat (triage teams  
 13 deployed at 02.20, 2 hours 20 after attack). We should  
 14 have been able to deploy ambulance/FRS into warm zone on  
 15 outside of building within 30 minutes of attack and  
 16 therefore would have rescued a number of casualties  
 17 early. This delay would unequivocally have resulted in  
 18 unnecessary loss of life."  
 19 Thank you very much, we can take that from the  
 20 screen.  
 21 So do you agree that there were important lessons  
 22 identified as a result of Exercise Winchester Accord  
 23 that needed to be learned?  
 24 SCOTT WILSON: There was, without a doubt, and if they'd  
 25 concentrated on what came out of the police debrief,

119

1 that would have went a far away to improving the  
 2 situation. The problem was there were lots of debriefs  
 3 and lots of recommendations, which again I felt muddled  
 4 the water.  
 5 Q. Is it fair, in your view, to suggest that GMP didn't  
 6 learn those lessons in the sense of making change that  
 7 was needed?  
 8 SCOTT WILSON: They didn't, they certainly didn't.  
 9 Q. As you say, many of the things identified there were to  
 10 go wrong on the night, and so what you're describing is  
 11 a worrying state of affairs, do you agree?  
 12 SCOTT WILSON: Yes, when we were looking at the presence one  
 13 year later and none of this has changed. It's virtually  
 14 the same state of affairs one year later.  
 15 Q. Is it your view that the failure to implement the change  
 16 that you describe as indicated represents a serious  
 17 failure by Greater Manchester Police?  
 18 SCOTT WILSON: Yes.  
 19 Q. I'm going to ask about one final topic on exercising.  
 20 These questions are going to be directed at Mr Sirrell.  
 21 It may be that once we've got to the end of that, it  
 22 will be an appropriate time for a break.  
 23 Mr Sirrell, one of the issues that has been raised  
 24 by a number of witnesses, and in fact mentioned by the  
 25 chairman as well, is that exercises seemed to tend to

120

1 start at the point at which deployment was taking place.  
 2 Do you understand what I mean?  
 3 IAIN SIRRELL: I do understand, yes.  
 4 Q. Therefore they were not exercising how that deployment  
 5 was dialled up in the first place?  
 6 IAIN SIRRELL: I'd agree with that, yes.  
 7 Q. So the question that has been posed to a number of  
 8 witnesses now is whether control rooms should commonly  
 9 take place in exercises.  
 10 IAIN SIRRELL: And I believe they should.  
 11 Q. Some witnesses have suggested that there is or may be  
 12 a practical problem with that happening; do you agree or  
 13 disagree?  
 14 IAIN SIRRELL: To the extent I do agree, I have heard the  
 15 evidence, and certainly the most recent evidence, of  
 16 Mr Clements, but practicalities involving a control room  
 17 in its entirety within an exercise situation because of  
 18 ongoing business — and policing is 24/7, we need to be  
 19 able to act, yet there are ways around it, it's not an  
 20 impossibility, and certainly in the force I worked in,  
 21 we did that, we managed it.  
 22 Q. So within North Yorkshire Police where you had most of  
 23 your experience, are you saying you did manage to  
 24 conduct exercising which also involved the control  
 25 rooms?

121

1 IAIN SIRRELL: Well, it was solely for the — in terms of  
 2 counter-terrorism, the Plato response, it was designed  
 3 solely for the control rooms. But a whole control room  
 4 approach rather than just a few people selected to — as  
 5 Mr Wilson was saying, a large 800-person exercise and  
 6 you'd maybe have a handful of control room operatives  
 7 almost to perform an administrative function. The  
 8 exercising that we developed was whole control room  
 9 training from call-taker through to the FIM, the FDO.  
 10 SIR JOHN SAUNDERS: Sorry, using everybody in the control  
 11 room?  
 12 IAIN SIRRELL: Yes, sir.  
 13 SIR JOHN SAUNDERS: So business as usual somehow?  
 14 IAIN SIRRELL: We were in a position, where due to the shift  
 15 pattern that was operated, 1 day every 5 weeks was  
 16 a training day, so we utilised that training day to  
 17 fully exercise the control room.  
 18 SIR JOHN SAUNDERS: Right. Thank you.  
 19 MR GREANEY: So you recognise as real the practical  
 20 difficulties that some witnesses have referred to, but  
 21 your view is that such difficulties are not insuperable?  
 22 IAIN SIRRELL: They are not.  
 23 Q. And moreover, that they should be overcome so that  
 24 control rooms do take part in exercising?  
 25 IAIN SIRRELL: I think it's essential and, as I know we've

122

1 discussed, I view it as — it's the first point of  
 2 failure.  
 3 Q. What is a first point of failure?  
 4 IAIN SIRRELL: If the control room isn't exercised, if the  
 5 control room doesn't necessarily understand its  
 6 function, and individuals within that room don't  
 7 understand their role, it's the first opportunity for  
 8 a situation to fail. And when I say a situation, I mean  
 9 a response to an incident.  
 10 Q. Thank you. Sir, that's all propose to all at this stage  
 11 about exercising. I am going to move on and deal with  
 12 just one other topic before we break.  
 13 The next topic is training. Mr Wilson, I believe  
 14 that these questions are best directed to you.  
 15 SCOTT WILSON: Generally between myself and Mr Dickinson.  
 16 IAN DICKINSON: We will see what happens.  
 17 Q. Did GMP have in place an adequate system for training  
 18 its commanders?  
 19 IAN DICKINSON: We've no reason to doubt that, sir.  
 20 Q. Did GMP in place an adequate system for training its  
 21 front line officers?  
 22 IAN DICKINSON: I've got to say, sir, that we were not  
 23 presented with evidence to make a judgement one way or  
 24 the other. What we did was we looked at the individual  
 25 descriptors of command training that officers put

123

1 forward. We also looked at the adequacy against the  
 2 College of Policing specification of the training of  
 3 armed officers, but beyond that, we were not given the  
 4 opportunity to do a specific assessment of individual  
 5 officers against a benchmark of requirement issued by  
 6 the College of Policing or any other body.  
 7 Q. Let's see if I can just take it slightly further and see  
 8 whether you agree that there may be two respects in  
 9 which there was an issue about training. First, in your  
 10 view, was Operation Plato sufficiently understood across  
 11 Greater Manchester Police?  
 12 IAIN SIRRELL: No, sir, it was not.  
 13 Q. Why do you stress that view?  
 14 IAIN SIRRELL: From the evidence that's been presented, the  
 15 number of people who simply were not aware. We've seen  
 16 the evidence from Mr Buchan from Her Majesty's  
 17 Inspectorate of Constabulary who said there was low  
 18 awareness of Plato not only in the control room but  
 19 beyond.  
 20 Then we have seen the evidence that's been presented  
 21 in oral form, but also written form, where there seems  
 22 to be confusion around Plato and how Plato operates.  
 23 SCOTT WILSON: If I could add to that?  
 24 Q. Please do.  
 25 SCOTT WILSON: Again, I would say the responsibility of that

124



1 doesn't just sit with GMP, it would sit in the region  
 2 because when that's coming out from national  
 3 headquarters, it's going to the north-west CTU and it is  
 4 going to the ACC we were talking about, that person who  
 5 has responsibility for counter-terrorism in the region.  
 6 So we haven't looked at what did it look like in  
 7 Merseyside or Cheshire, but if it wasn't happening in  
 8 Manchester, is it more of a regional problem rather than  
 9 a force problem?  
 10 SIR JOHN SAUNDERS: We know that the Silver commander hadn't  
 11 heard of Plato, which obviously everyone agrees is quite  
 12 unacceptable. In relation to on-the-ground officers,  
 13 policemen, the police who first went to the scene,  
 14 things like that, did they need to know what Plato was  
 15 and to what extent did they need to know? Or do they  
 16 just need to know they needed to do what the commanders  
 17 told them?  
 18 MR GREANEY: Sir, can I add to those understandable  
 19 questions? Is the fact that Plato was not sufficiently  
 20 understood at that level explicable on the basis that  
 21 there was sensitivity around the plan?  
 22 SCOTT WILSON: I think it was an official sensitive  
 23 document, so my viewpoint is it should have been shared  
 24 with all supervisors, certainly inspectors and above.  
 25 When you get to superintendents, a superintendent,

125

1 especially a night duty superintendent covering the  
 2 force, should have known that plan inside out. He  
 3 should know what that plan was about.  
 4 Q. I'm going to come on to look at Mr Nawaz separately in  
 5 due course. But the chairman's question was focused  
 6 upon the officers on the ground, so constables,  
 7 sergeants. Would you have expected those officers to  
 8 have been familiar with Operation Plato?  
 9 SCOTT WILSON: Probably not, apart from the firearms  
 10 officers. I'd expect the firearms officers --  
 11 SIR JOHN SAUNDERS: Okay, with the exception of the firearms  
 12 officers. Unarmed people on the ground?  
 13 SCOTT WILSON: Probably not. They might have heard the term  
 14 and they might know it is do with the response to  
 15 terrorism (overspeaking).  
 16 SIR JOHN SAUNDERS: They may have known the term, but the  
 17 question is: did they need to know anything about it?  
 18 SCOTT WILSON: Probably not because they're going to be led  
 19 by someone, supervisors and above, sergeants and above,  
 20 I would say, yes.  
 21 IAIN SIRRELL: The sensitivity that we see around the  
 22 document, albeit we recognise it wasn't necessary, it  
 23 wasn't just -- I don't believe this was probably limited  
 24 to GMP. To take your point, sir, did the officers on  
 25 the ground need to know the specifics beyond the

126

1 firearms teams, perhaps not.  
 2 SIR JOHN SAUNDERS: Okay, thank you.  
 3 MR GREANEY: The second area in which there may be an issue  
 4 about training relates to first aid training and  
 5 equipment. Gentlemen, did you note that officers who  
 6 deployed on the night into the City Room, many of them  
 7 regarded themselves as insufficiently trained for what  
 8 they had to deal with?  
 9 IAN DICKINSON: Yes, we noted that frequently in the  
 10 evidence given to this inquiry.  
 11 Q. You deal in fact with the current first aid training of  
 12 officers in your second report at page 276 --  
 13 SIR JOHN SAUNDERS: Again, I think I may have them in a  
 14 different order. Can you tell me the INQ number?  
 15 MR GREANEY: Yes, sir. The passage starts at  
 16 {INQ035309/275}.  
 17 SIR JOHN SAUNDERS: Thank you.  
 18 MR GREANEY: This is page 272 of your report. Page 275 of  
 19 the INQ. You observe:  
 20 "It is well-established national practice that all  
 21 police officers receive basic first aid training. It is  
 22 specified in the national policing curriculum and  
 23 includes the following elements..."  
 24 Just pausing for a moment, who is responsible for  
 25 publishing the national policing curriculum?

127

1 IAN DICKINSON: The College of Policing.  
 2 Q. Over the page {INQ035309/276}:  
 3 "a) Manage a first aid scene;  
 4 "b) Assess a casualty;  
 5 "c) Perform basic life support (including adult,  
 6 child and infant);  
 7 "d) Demonstrate safe use of an Automated External  
 8 Defibrillation (AED);  
 9 "e) Manage a choking casualty (including child or  
 10 infant);  
 11 "f) Place a casualty in the recovery position;  
 12 "g) Report casualty information;  
 13 "h) Manage a casualty with shock;  
 14 "i) Manage a casualty with chest pain;  
 15 "j) Manage a casualty who has fainted;  
 16 "k) Manage a casualty who is bleeding;  
 17 "l) Manage a casualty with spinal injury;  
 18 "m) Manage a casualty who is convulsing;  
 19 "n) Manage the control of infection."  
 20 The position in the evidence is that "manage  
 21 a casualty who is bleeding" does not extend to managing  
 22 a casualty who has a catastrophic bleed.  
 23 IAN DICKINSON: I think as we said in the report, we don't  
 24 claim any expertise in medical matters or first aid, but  
 25 it did strike us that the evidence of, I can't remember

128

1 the witness's name, Brigadier Hodgetts, his evidence we  
 2 found compelling insofar as police officers are likely  
 3 to be first on the scene of a major attack and one of  
 4 the actions that needs to be taken is to control  
 5 catastrophic blood loss and we were convinced that the  
 6 element of this list, control of bleeding, perhaps needs  
 7 to be made more prominent and perhaps more explicit.  
 8 SIR JOHN SAUNDERS: Perhaps in this case, I'm entitled to  
 9 ask why has nobody ever thought of this before?  
 10 IAN DICKINSON: I think because there's been, as we  
 11 understand it, a degree of debate in the medical  
 12 community about whether or not tourniquets and the  
 13 specialised trauma bandages are appropriate to be used  
 14 by non-specialists.  
 15 SCOTT WILSON: If I could add something too. It didn't come  
 16 out in Brigadier Hodgetts' evidence, but NaCTSO linked  
 17 in with Brigadier Hodgetts in 2016, the year after the  
 18 Bataclan attack, and NaCTSO, together with  
 19 Brigadier Hodgetts, brought citizenAID out. We  
 20 basically launched it during our CT Awareness Week  
 21 because we felt really strongly that the public, the  
 22 general public, needed to know what this was about.  
 23 We tried to push it into schools as well. Again,  
 24 there was problems with the Department of Education  
 25 because they were frightened that children would start

129

1 using tourniquets, practising, et cetera. So pushing it  
 2 to the public sometimes is really quite easy, because  
 3 you can do a public campaign and say, "Here it is". But  
 4 when you then try and push it into, whether it's schools  
 5 or into the police, it becomes much more problematic  
 6 than just doing a public campaign to say, "Here", and  
 7 it's out there.  
 8 So NaCTSO was linked in with Brigadier Hodgetts back  
 9 from that — we did TV releases with them and we  
 10 released it during that CT Awareness Week to say that,  
 11 "We within National CT Policing think this is a great  
 12 idea", but it's always more difficult to get it aligned  
 13 with the police or get it aligned into education.  
 14 MR GREANEY: Did you say that was in 2016?  
 15 SCOTT WILSON: November 2016 during CT Awareness Week we  
 16 done a campaign with Brigadier Hodgetts supported by  
 17 NaCTSO. We were launching CT Awareness Week, so it was  
 18 things like "Run Hide Tell", and all of the different  
 19 concepts, and that was one of the concepts we launched  
 20 during the — it was called citizenAID.  
 21 Q. So NaCTSO was recognising the validity of what  
 22 Brigadier Hodgetts was doing?  
 23 SCOTT WILSON: Certainly.  
 24 Q. Regarded it as sufficiently important to promote it to  
 25 the public?

130

1 SCOTT WILSON: Yes.  
 2 Q. So bearing that in mind, it might be thought surprising  
 3 that within policing it wasn't thought important that  
 4 police officers should understand —  
 5 SCOTT WILSON: It's getting it through the barriers.  
 6 I could use the same with "Run Hide Tell" as a concept.  
 7 We run "Run Hide Tell" to the public, to advertise — we  
 8 use celebrities to advertise it. When we then tried to  
 9 get that into schools it became a bit of a blockage with  
 10 the Department of Education.  
 11 When you're delivering CT awareness to the general  
 12 problem it usually is quite easy because you can find  
 13 someone who can deliver the message and you can deliver  
 14 it. When you then start delivering it within your own  
 15 organisations, within policing, fire, you start hitting  
 16 barriers, which makes it very, very difficult. And  
 17 I can't recall the exact barriers there was, but there  
 18 were certainly barriers from the medical provision  
 19 saying, "Is this what we should be doing? Is it what we  
 20 shouldn't be doing?" and it didn't get landed within  
 21 police the same as it had within the public.  
 22 Q. But notwithstanding the barriers that seemed to have  
 23 existed at that point in time, do the three of you  
 24 support the view that many have now expressed that  
 25 police officers should additionally be trained in the

131

1 treatment of catastrophic bleeds and in the maintenance  
 2 of airways?  
 3 SCOTT WILSON: Yes.  
 4 IAN DICKINSON: Yes.  
 5 Q. So do you agree therefore with Deputy Chief  
 6 Constable Pilling and Assistant Chief Constable  
 7 O'Callaghan that this is an issue that the College of  
 8 Policing needs to address and that it needs to do so  
 9 urgently?  
 10 SCOTT WILSON: Yes.  
 11 IAN DICKINSON: Yes.  
 12 IAIN SIRRELL: Yes.  
 13 MR GREANEY: Sir, that would be a convenient moment for our  
 14 afternoon break? Then I'll turn to a greater extent  
 15 towards the events of the night.  
 16 SIR JOHN SAUNDERS: Mr Cooper.  
 17 MR COOPER: Sir, it may be gratifying you for you to know  
 18 that this very day, citizenAID and St John Ambulance  
 19 announced a partnership whereby they would together  
 20 promote the use of trauma kits in education —  
 21 SIR JOHN SAUNDERS: CitizenAID and whom, sorry?  
 22 MR COOPER: CitizenAID and the St John Ambulance  
 23 organisation. They only announced this lunchtime that  
 24 they were forming a partnership to promote the use of  
 25 these kits in education and indeed use amongst the

132

1 public. They specifically cite this inquiry as being  
 2 the catalyst for that, so you might be gratified to hear  
 3 that.  
 4 SIR JOHN SAUNDERS: I am gratified, thank you. I also note  
 5 it's an appropriate date that it appears, if my reading  
 6 of the newspapers is correct, that the criminal trial  
 7 in the Bataclan attack started very recently in Paris.  
 8 MR GREANEY: It did start very recently, last week.  
 9 SIR JOHN SAUNDERS: So those who criticise how long it has  
 10 taken to get this inquiry going might like to bear that  
 11 in mind.  
 12 MR GREANEY: Quite.  
 13 SIR JOHN SAUNDERS: How long do you want?  
 14 MR GREANEY: Quarter of an hour, please, sir.  
 15 (3.23 pm)  
 16 (A short break)  
 17 (3.38 pm)  
 18 MR GREANEY: Gentlemen, as I indicated before we stopped for  
 19 our break, I'm going to turn away, at least for the time  
 20 being, from issues that might be described as planning  
 21 and preparation and to look at some features of the  
 22 actual response on the night by GMP.  
 23 First of all, we need to understand the concept of  
 24 a major incident. This, I think, is probably directed  
 25 to Mr Dickinson. Is that term, major incident, one with

133

1 a particular meaning within policing and indeed within  
 2 the emergency services more generally?  
 3 IAN DICKINSON: Yes, it's a term which is used between  
 4 emergency services and it essentially relates to an  
 5 event or an emergency which requires special measures to  
 6 be implemented by one or more of the emergency services.  
 7 Q. That's a neat summary. I'm going to read out the actual  
 8 definition:  
 9 "An event or situation with a range of serious  
 10 consequences which requires special arrangements to be  
 11 implemented by one or more emergency responder  
 12 agencies."  
 13 IAN DICKINSON: Yes.  
 14 SIR JOHN SAUNDERS: It's quite a circular definition.  
 15 IAN DICKINSON: It's very wide, but deliberately wide,  
 16 I think, to encompass --  
 17 SIR JOHN SAUNDERS: You define it as "major incident  
 18 requiring special arrangements" and you define it as  
 19 a major incident because special arrangements are put in  
 20 place. That's fine, I don't mind.  
 21 IAN DICKINSON: It stood the test of time and it works.  
 22 SIR JOHN SAUNDERS: That's all that matters then.  
 23 MR GREANEY: Is that term, major incident, used within the  
 24 emergency services as a trigger for something to happen?  
 25 IAN DICKINSON: It should be, sir, yes.

134

1 Q. What does that term trigger if it is declared?  
 2 IAN DICKINSON: It should trigger the use of the plans, the  
 3 major incident plans, in any agency who is deeply  
 4 involved in the response.  
 5 Q. So as you put it in your first report:  
 6 "The term major incident is used as a trigger to  
 7 implement special arrangements by all the responding  
 8 agencies"?  
 9 IAN DICKINSON: Yes.  
 10 Q. "Depending on the nature of the emergency, the  
 11 declaration of a major incident by one agency will  
 12 frequently cascade automatically to other category 1  
 13 responders"?  
 14 IAN DICKINSON: Yes. Some time ago it used to be that  
 15 a declaration in one agency automatically declared in  
 16 all agencies, but that has now been relaxed for fairly  
 17 obvious reasons. It's now a judgement to be made, but  
 18 it's a judgement which is one which must be made as  
 19 opposed to it being a passive option.  
 20 Q. That's obviously something we're going to come to in  
 21 more detail. You add in your report:  
 22 "Use of the term major incident therefore reflects  
 23 the effect that an emergency has on the response  
 24 required from the organisations concerned."  
 25 IAN DICKINSON: That's true.

135

1 Q. What do you mean by that?  
 2 IAN DICKINSON: The arrangements which are put in place by  
 3 all agencies in response to a major incident are fairly  
 4 consistent across the country. They reflect the JESIP  
 5 principles and they reflect the outline of those  
 6 arrangements, which are contained in government  
 7 guidance.  
 8 Q. Did the materials that you've reviewed, and perhaps in  
 9 particular the GMP major incident plan, demonstrate that  
 10 GMP was well aware of the concept of a major incident  
 11 and what the consequences were of declaring something as  
 12 such?  
 13 IAN DICKINSON: Yes, indeed. The GMP major incident plan  
 14 was certainly fit for purpose and so was the  
 15 multi-agency major incident plan, which is produced by  
 16 the LRF.  
 17 Q. Were the events at Manchester Arena on 22 May 2017  
 18 unquestionably a major incident?  
 19 IAN DICKINSON: In our unequivocal view, yes, they were.  
 20 Q. Should GMP have declared it as such?  
 21 IAN DICKINSON: Yes, they should.  
 22 Q. We know, of course, that there did come a time when they  
 23 declared a major incident, but that was gone midnight.  
 24 IAN DICKINSON: It was. Superintendent Thompson declared  
 25 the major incident and I think in his evidence he said

136

1 if it was a major incident at 1 am, it was a major  
 2 incident at 10.45 pm, which I think was quite a telling  
 3 statement.  
 4 Q. And if GMP should have declared a major incident, at  
 5 what time do you consider GMP ought to have declared the  
 6 events at the arena a major incident?  
 7 IAN DICKINSON: I would have thought as soon as it became  
 8 clear to the force duty officer the scale of the number  
 9 of casualties and the event that caused those  
 10 casualties, so probably within the first 8 or 9 minutes.  
 11 Q. And certainly, do you agree, by the time Plato is  
 12 declared at 10.46, there can be little doubt that  
 13 a major incident should have been declared?  
 14 IAN DICKINSON: No doubt at all. In fact, the major  
 15 incident should have been declared earlier than the  
 16 Operation Plato.  
 17 Q. And you may have answered my next question, at least in  
 18 part: whose responsibility was it to declare a major  
 19 incident, and if more than one person, which persons and  
 20 at what stages?  
 21 IAN DICKINSON: Largely, the force duty officer but the way  
 22 in which the declaration or the identification of  
 23 a major incident works is that it is anybody who is —  
 24 any member of the organisation who is in a position to  
 25 assess the nature of the event and recognise its

137

1 severity. So essentially, any commander, any  
 2 supervisor, inspector, sergeant on the street or anybody  
 3 in the control room in a supervisory role.  
 4 Q. Is it acceptable that a major incident was not declared  
 5 until much later than you consider it should have been?  
 6 IAN DICKINSON: In our view, it was a significant omission.  
 7 Q. Is it a striking feature that it was an omission not  
 8 only by the FDO but also by other commanders?  
 9 IAN DICKINSON: Subsequently, yes, sir.  
 10 SIR JOHN SAUNDERS: Is it a case of people leaving it to the  
 11 other? Would they expect the FDO to be the primary  
 12 person who would be doing it because he's getting all  
 13 the information in to him, therefore someone on the  
 14 fringe might not want to do it without consulting the  
 15 FDO?  
 16 IAN DICKINSON: It's difficult for us to say, sir, but the  
 17 Greater Manchester Police position as we understand  
 18 it is by declaring Operation Plato, that meant that  
 19 a major incident did not need to be declared. Our view  
 20 is that the two plans and the two responses are not  
 21 mutually exclusive.  
 22 MR GREANEY: You have actually started to deal with my very  
 23 next point. I was going to ask you whether the delay  
 24 can be explained, by which I mean reasonably explained,  
 25 because Plato had been declared.

138

1 IAN DICKINSON: Not as a rational explanation, sir, no.  
 2 Q. So in order to understand that answer, we need to  
 3 understand how Operation Plato and a major incident  
 4 relate to each other?  
 5 IAN DICKINSON: I can certainly explain that.  
 6 Operation Plato deals explicitly — and Mr Sirrell will  
 7 probably be able to explain as well as I can — with an  
 8 armed marauding, at the time, firearms threat. It is  
 9 a mobile threat and it is a continuing threat against  
 10 many people. The major incident arrangements deal with  
 11 the consequences of that act. They deal with the people  
 12 who are injured, the people who need help, the people  
 13 who are being killed. It does not concern itself with  
 14 the cause of the emergency: it concerns itself with  
 15 managing the consequences of that emergency and bringing  
 16 help to those who are affected.  
 17 Q. So would the declaration of a major incident on top of  
 18 or even, on your view, before the declaration of  
 19 Operation Plato have made a difference on the night?  
 20 IAN DICKINSON: Yes, it would, unquestionably.  
 21 Q. In what way or ways?  
 22 IAN DICKINSON: It would have brought an automatic FCP and  
 23 RVP structure. It would have mobilised the assets which  
 24 are specifically and especially prepared in Greater  
 25 Manchester Police and indeed in BTP — bringing extra

139

1 equipment to the scene so that we can establish those  
 2 functions and it would have mobilised the force around  
 3 the consequence management rather than focusing  
 4 exclusively on the believed continued threat.  
 5 SIR JOHN SAUNDERS: And Plato would not have done that?  
 6 IAN DICKINSON: No, sir, it wouldn't. Plato deals with  
 7 threat.  
 8 SIR JOHN SAUNDERS: Are those matters not set out in JOPs?  
 9 IAN DICKINSON: They are, sir. My colleague is probably  
 10 better placed than I am to answer that.  
 11 SIR JOHN SAUNDERS: But Plato would bring into operation  
 12 JOPs?  
 13 IAIN SIRRELL: I don't want to speak for Mr Wilson because  
 14 it's in the piece that he wrote at the front of JOPs 3,  
 15 but it clearly separates them and says they should both  
 16 be applied at the same time.  
 17 MR GREANEY: So what difference do you consider  
 18 a declaration or a prompt declaration of a major  
 19 incident would have made on the night?  
 20 IAIN SIRRELL: As Mr Dickinson says, it's to do with the  
 21 response to the effect of the Plato as opposed to Plato  
 22 being the response to the attack itself and to go  
 23 forward, confront and neutralise the threat.  
 24 Q. Mr Wilson, do you have anything to add?  
 25 SCOTT WILSON: I think as I said at the beginning, the major

140

1 incident is the consequence management of the full  
 2 incident you're dealing with. The Plato, to me, is like  
 3 a bolt—on to dealing with that marauding threat. When  
 4 they both talk about FCPs and they both talk about RVPs,  
 5 they are going to be the same FCPs and RVPs, but as  
 6 I made the point at the beginning, if that had had a gas  
 7 explosion at the arena rather than a terrorist incident,  
 8 you'd still have an RVP and hopefully an FCP coming  
 9 together but you wouldn't have Plato.  
 10 SIR JOHN SAUNDERS: Is it important that a major incident is  
 11 communicated to the other responders as well?  
 12 SCOTT WILSON: Yes, it is.  
 13 SIR JOHN SAUNDERS: I'm saying that because we know actually  
 14 the other responders didn't know about Operation Plato.  
 15 We're told, a matter for discussion, that the FDO did  
 16 that deliberately. But he had no deliberate reason for  
 17 not declaring a major incident presumably?  
 18 SCOTT WILSON: No, I feel in the first 10 minutes, as we  
 19 said — round about 22.40, if a major incident had been  
 20 declared and they'd done a constructive METHANE message,  
 21 fire would probably have moved at that stage to the  
 22 scene. Plato comes 7 minutes later. They would  
 23 probably have been at the scene by the time the Plato  
 24 declaration came out and you'd have avoided the "It's  
 25 a Plato, we're not going to it" because they would have

141

1 been there anyway. They would probably — no doubt  
 2 North West Fire Control would have looked at it: major  
 3 incident, METHANE message, which is the exact location  
 4 and your major incident declared, and I think they would  
 5 have responded in that way. And then if Plato had come  
 6 out, there would have at least been co—location to then  
 7 assess risk if we're going forward or not, which then  
 8 brings everything else to it.  
 9 MR GREANEY: METHANE message is the topic I'm going to come  
 10 to next in one moment. Let me make sure the three of  
 11 you are agreed about this.  
 12 The failure to make a prompt declaration of a major  
 13 incident by Greater Manchester Police, do each of you  
 14 agree that that was an omission?  
 15 THE WITNESSES: Yes.  
 16 Q. And do you consider it a significant omission?  
 17 THE WITNESSES: Yes.  
 18 SIR JOHN SAUNDERS: Okay. Sorry, do you mind? We are told  
 19 that GMP do not agree and they say that Plato stands  
 20 instead of, as it were, a major incident. Is it written  
 21 down anywhere, is it in anything which says which is  
 22 right?  
 23 SCOTT WILSON: I think Mr Greaney looked at it this morning,  
 24 in the front of JOPs, where it says it complements the  
 25 plans, it complements the major incident plan. That's

142

1 what JOPs 3 was always meant to do. It was never meant  
 2 to be a standalone in its own right: it would complement  
 3 a major incident plan. It says it right at the  
 4 foreword, I think it's the second paragraph of the  
 5 foreword, and it says it right in the beginning:  
 6 complementing major —  
 7 SIR JOHN SAUNDERS: How can this misunderstanding come  
 8 about? It's a pretty major matter, isn't it?  
 9 SCOTT WILSON: Misunderstanding of the guidelines.  
 10 MR GREANEY: Let's just put that back on the screen. This  
 11 is JOPs edition 3. {INQ008372/2}, please.  
 12 You're quite right, Mr Wilson, I did refer to this  
 13 this morning. We can now focus on that sentence that  
 14 you would wish us to:  
 15 "This guidance should be used to inform existing  
 16 major incident procedures and must be used in  
 17 conjunction with local and national standard operating  
 18 procedures."  
 19 Is that the passage you had in mind?  
 20 SCOTT WILSON: That's it. That's exactly what it was meant  
 21 to do. They should have realised, as I said — I know  
 22 I've used the word, but I've always seen it as  
 23 a bolt—on, a bolt—on to the major incident plan.  
 24 Q. Next topic. And Mr Dickinson, again, these questions  
 25 are directed first to you. The inquiry is now very

143

1 familiar with the concept of a METHANE message, so: M,  
 2 major incident; E, exact location; T, type of incident;  
 3 H, hazards; A, access; N, number of casualties; E,  
 4 emergency services.  
 5 Mr Dickinson, what is the importance of a METHANE  
 6 message?  
 7 IAN DICKINSON: You can imagine in the first response to  
 8 a major incident, one of the most important elements of  
 9 JESIP to be satisfied is the exchange of information,  
 10 the creation of situational awareness between commanders  
 11 of all agencies. Against that, the first responders and  
 12 arrivals at a major incident are people who are liable  
 13 to become completely overwhelmed by the scale of what  
 14 they are facing, by the horrors of what people are  
 15 experiencing and by the immediate needs of people who  
 16 are suffering.  
 17 So the concept of METHANE is a pause point, it is  
 18 a mnemonic to be applied to some of the officers who  
 19 first arrived on the scene to say, "Stop, don't move  
 20 forward, gather this information and give it to your  
 21 control centre". The reason being that the control  
 22 centre then has a structured assessment of the major  
 23 incident that people are facing and can then share that  
 24 assessment with their own commanders and with other  
 25 agencies, and then gradually, over a period of the next

144

1 10/15/30 minutes, more and more information is added to  
 2 that assessment to create good shared situational  
 3 awareness.  
 4 SIR JOHN SAUNDERS: I understand what a mnemonic means,  
 5 I could remember METHANE, I doubt if arriving at  
 6 the scene I could remember what each of the initials  
 7 stood for. Do police officers have on them what is  
 8 a METHANE message, what they stand for?  
 9 IAN DICKINSON: Two things, sir. First of all, yes, there  
 10 are, there are cards given out widely to emergency  
 11 officers and also there is an app on a phone. But if  
 12 you saw what — I'm sure you did see what BTP did,  
 13 BTP's control centre had access to what a METHANE  
 14 assessment should be and they specifically talked their  
 15 sergeant through it, "Saying is this a major incident,  
 16 what's the location?"  
 17 SIR JOHN SAUNDERS: That's the other way round, being asked  
 18 by control when you actually call in.  
 19 IAN DICKINSON: That's quite important because officers  
 20 overwhelmed at the scene need to be given clear  
 21 instructions: do this, give me this information, this is  
 22 how to do it. With training beforehand, access to the  
 23 mnemonic and direction from the control centre, it's  
 24 eminently doable and it's very valuable.  
 25 SIR JOHN SAUNDERS: Thank you.

145

1 MR GREANEY: Have I correctly understood that obviously  
 2 a key aspect of this is the fact that there should be  
 3 a METHANE message which is passed as soon as possible?  
 4 But moreover, that that METHANE message must be shared  
 5 by the service that receives it with emergency service  
 6 partners?  
 7 IAN DICKINSON: Vitally important, yes.  
 8 Q. We're going to look at what happened so far as GMP is  
 9 concerned in a moment. But you'll be aware that, and  
 10 you have just mentioned, that BTP did pass a good  
 11 quality METHANE message?  
 12 IAN DICKINSON: Yes, they obtained a good quality METHANE  
 13 message but it was not shared with other agencies.  
 14 Q. And NWS also, Paddy Ennis, passed a METHANE message?  
 15 IAN DICKINSON: That's the case.  
 16 Q. Again, not shared?  
 17 IAN DICKINSON: I'm not entirely certain about how far it  
 18 was shared, but it wasn't shared to GMP.  
 19 Q. The answer will again be obvious, but is it acceptable  
 20 or unacceptable that those two organisations who did get  
 21 a METHANE message didn't share it with emergency service  
 22 partners?  
 23 IAN DICKINSON: Not acceptable at all, sir. It's  
 24 a fundamental building block of good shared situational  
 25 awareness and the JESIP principles.

146

1 Q. There does, just to focus in on GMP, come a time at  
 2 which Chief Inspector Dexter is at the scene and he does  
 3 pass information back to the force control room. But  
 4 have you been able to identify any stage at which any  
 5 GMP officer passes a METHANE message at any rate  
 6 promptly?  
 7 IAN DICKINSON: No, we haven't, sir, but to be fair, the  
 8 importance of the METHANE structure diminishes as the  
 9 incident progresses and more and more information is  
 10 passed to the control centre which should be distilled  
 11 into a broadening and growing situational assessment,  
 12 but we haven't identified a specific structured message  
 13 from the scene from GMP at all.  
 14 SIR JOHN SAUNDERS: We have tended to put responsibility on  
 15 this, really, on the officer at the scene arriving. But  
 16 actually assuming that they ring in to give some  
 17 indication that something's going on, it's much easier  
 18 for the control room to be the people. They're sitting  
 19 there in the control room, they would have ready access  
 20 to some documentation which could tell them the  
 21 questions which need to be asked, and they're the people  
 22 to need to pass it on.  
 23 IAN DICKINSON: Indeed, sir. That's what BTP did very well.  
 24 Sorry, BTP obtained the information —  
 25 SIR JOHN SAUNDERS: They didn't pass it on, yes. They did

147

1 half the job.  
 2 IAN DICKINSON: Yes, sir.  
 3 MR GREANEY: This is exactly the point I wanted you to help  
 4 with. The FDO should certainly be expected to know that  
 5 a METHANE message is a critical part of JESIP working?  
 6 IAN DICKINSON: Yes.  
 7 Q. If one isn't coming through, is it reasonable to expect  
 8 the FDO to direct that a METHANE message should be  
 9 obtained?  
 10 IAN DICKINSON: Either the FDO or somebody operating on his  
 11 behalf. I would expect any supervisor in the control  
 12 centre to understand that.  
 13 Q. You say someone acting under his direction. This takes  
 14 us to an issue that we're going to have to look at in  
 15 detail, namely action cards, ensuring that there is  
 16 someone within that control room who is given that job:  
 17 have we have a METHANE message? If not, get one.  
 18 IAN DICKINSON: Yes, sir.  
 19 Q. So at what stage do you consider a METHANE message  
 20 should have been passed by a GMP officer?  
 21 IAN DICKINSON: First officer at the scene, sir. The very  
 22 first officer to arrive should have been directed to  
 23 give an initial METHANE assessment. It might have been  
 24 very sketchy and in need of development and indeed that  
 25 would be what would be expected, but as successive

148

1 officers arrive and more information is available, that  
 2 assessment can be expanded. But the very first officer  
 3 at the scene should give a METHANE assessment and that's  
 4 contained in the major incident plan from all the  
 5 agencies that we've looked at.  
 6 Q. Is it in your view acceptable or unacceptable that  
 7 neither that officer nor other officers who followed him  
 8 in did pass such a METHANE message?  
 9 IAN DICKINSON: No, it isn't, but I've got to say that one  
 10 cannot blame the officers too much because of the  
 11 overwhelming nature of what they were facing when they  
 12 did arrive. The clear responsibility, in my view, lies  
 13 with the control centre.  
 14 IAIN SIRRELL: We saw with Sergeant Cawley, as  
 15 Sergeant Cawley went in and the difficulty  
 16 Inspector Dawson as the control room inspector for BTP  
 17 had in getting that officer to take a step back to  
 18 actually pass the message, because there's that  
 19 overwhelming need or desire to assist and to be involved  
 20 in the response.  
 21 Q. So you're very clear that one mustn't, at least not  
 22 principally, blame the officers at the scene. It's the  
 23 control room's job to secure that information and,  
 24 moreover, is it fair to observe that if you are to  
 25 expect officers at the scene to pass a METHANE message

149

1 you need to ensure that METHANE and the principles that  
 2 it represents are embedded within your officers?  
 3 IAN DICKINSON: Yes.  
 4 Q. Did you see and hear in the oral evidence, and the other  
 5 materials that you've seen, anything to indicate whether  
 6 within JESIP the METHANE element of JESIP was  
 7 sufficiently embedded in GMP?  
 8 IAN DICKINSON: I don't believe we've seen evidence that  
 9 would enable us to conclude one way or the other. It  
 10 was certainly included in the JESIP training from the  
 11 NCALT package. We have evidence that that was delivered  
 12 to all operational officers. Whether or not that was  
 13 carried forward into business as usual on a routine  
 14 basis rather than reserving it only for major incidents,  
 15 I couldn't say, but my colleague Mr Sirrell may have  
 16 a different view.  
 17 SIR JOHN SAUNDERS: He doesn't.  
 18 IAIN SIRRELL: No, I couldn't say.  
 19 Q. The reason I framed the question in the way I did, and  
 20 it may be that I have misunderstood a part of your most  
 21 recent report — this is {INQ041870/1}, the police  
 22 expert response to central issues, {INQ041870/30},  
 23 paragraph 135 — this was the question GMP56:  
 24 "Was GMP's approach to METHANE adequate? If any  
 25 part was inadequate, please identify the person or

150

1 persons responsible."  
 2 I'll just read out what you have there stated and  
 3 see if I have misunderstood. Paragraph 135:  
 4 "We have not seen in the oral evidence or additional  
 5 witness statements any evidence that the use of the  
 6 METHANE element of JESIP was embedded in the GMP command  
 7 and control arrangements. It did not appear to us to be  
 8 familiar or routine language."  
 9 So what should we understand from that paragraph?  
 10 IAN DICKINSON: We sought evidence to establish whether it  
 11 was embedded and routine and we couldn't find any.  
 12 We would have expected to find it if it were. But we  
 13 couldn't find explicit evidence that it wasn't. That  
 14 seems to be sitting on the fence in some ways but we  
 15 wanted to make clear that we couldn't draw a specific  
 16 conclusion because we did not have the specific  
 17 evaluation of whether that was the case or not.  
 18 Q. So does paragraph 135 set out, as you'd now wish to  
 19 express it, your view on this point?  
 20 IAN DICKINSON: I believe so, but I'll ask my colleagues  
 21 whether they agree.  
 22 SCOTT WILSON: Agree.  
 23 IAIN SIRRELL: Agree.  
 24 MR GREANEY: So where we've reached so far is no prompt  
 25 declaration of major incident, no prompt METHANE message

151

1 by GMP.  
 2 I am going to turn next to another matter that might  
 3 reasonably be suggested didn't work well on the night  
 4 and this is the role of the force duty officer.  
 5 Mr Sirrell, you are the person to answer these  
 6 questions, I believe.  
 7 IAIN SIRRELL: I am, yes.  
 8 Q. By 2017, was the risk that the FDO would be overburdened  
 9 and become overwhelmed in the event of an  
 10 Operation Plato declaration well understood in UK  
 11 policing?  
 12 IAIN SIRRELL: It was, yes, and we've heard from different  
 13 witnesses throughout the processes here that that was  
 14 the case.  
 15 Q. Was it, so far as you've understood the evidence, not  
 16 only understood across UK policing but specifically  
 17 understood within Greater Manchester Police?  
 18 IAIN SIRRELL: Yes, that's correct.  
 19 Q. In reaching that conclusion, have you had regard to the  
 20 evidence that Inspector June Roby gave that the problem  
 21 had been understood for a period of approaching  
 22 20 years?  
 23 IAIN SIRRELL: I have, yes.  
 24 Q. To the fact that Exercise Winchester Accord had revealed  
 25 an issue with the FDO in May 2016, albeit the role was

152

1 being tested in a different environment?  
 2 IAIN SIRRELL: Yes, that's correct.  
 3 Q. And the fact that at a high level, according to my  
 4 recollection, in November 2016, GMP was informed by the  
 5 Inspectorate of the risk of the FDO being overburdened?  
 6 IAIN SIRRELL: They were, yes.  
 7 Q. By 22 May 2017, in your view, had GMP taken appropriate  
 8 steps to address that issue?  
 9 IAIN SIRRELL: No, sir, they hadn't. They'd been made aware  
 10 from Winchester Accord and indeed  
 11 Inspector Marcus Williams had highlighted the issue and  
 12 action cards had been attempted. They'd been created,  
 13 but certainly not embedded.  
 14 Q. The issue had not been addressed by May 2017. And do  
 15 you agree with --  
 16 SIR JOHN SAUNDERS: Sorry, I'm concerned about the use of  
 17 embedded in a couple of different ways. They weren't  
 18 actually being used at the time of 22 May. Never mind  
 19 being embedded, they weren't there to be used as  
 20 I understand it.  
 21 MR GREANEY: Exactly. And very soon we're going to come on  
 22 to this important issue of action cards. So they hadn't  
 23 addressed the issue, point 1. Do you agree with what  
 24 some witnesses have suggested, namely that in one  
 25 respect they had made the situation worse because the

1 Whittle plan placed a burden upon the FDO that was  
 2 greater than SOP 47, version 5?  
 3 IAIN SIRRELL: I would agree with that, yes.  
 4 Q. The situation that you have just described or agreed  
 5 with, do you regard it as being acceptable or  
 6 unacceptable?  
 7 IAIN SIRRELL: We all regarded it as unacceptable.  
 8 Q. Connected with this issue, as the chairman has just  
 9 indicated, is the issue of action cards within the  
 10 police control room. As a starting point would you  
 11 explain to us, please, what the purpose of action cards  
 12 in this context is?  
 13 IAIN SIRRELL: In the context of Plato and certainly in the  
 14 context of the FDO role, the idea behind the action  
 15 cards, and certainly as I understand it from the  
 16 evidence we've seen, the action cards we've examined, is  
 17 to reduce the burden, or it should reduce the burden, on  
 18 the FDO, but also to pre-delegate tasks throughout the  
 19 control room so that staff are aware of what their roles  
 20 are and how they should respond.  
 21 Q. So it is a means by which this well-recognised potential  
 22 problem of overburdening the FDO can be managed?  
 23 IAIN SIRRELL: Yes.  
 24 Q. And you are managing it ahead of time, so not delegating  
 25 when it actually does happen, you're delegating it ahead

1 of time by giving particular people within the control  
 2 room particular responsibilities?  
 3 IAIN SIRRELL: That's correct. We have heard evidence from  
 4 different witnesses, Mr Pilling and certainly  
 5 ACC Hankinson, the idea or suggestion that the FDO could  
 6 and should delegate at the time.  
 7 SIR JOHN SAUNDERS: So we know that action cards had been  
 8 prepared. We know that they hadn't actually gone out to  
 9 the individual operators. Would they have required  
 10 training in the use of those action cards? They have to  
 11 know, "That is your job on the night", as set out in  
 12 however many action cards they're given. Would they  
 13 require training or is this something they could do  
 14 simply by having the action card?  
 15 IAIN SIRRELL: I think at the very least awareness, and if  
 16 they have the awareness of the action cards, it's a head  
 17 start. If they have the opportunity to train on them  
 18 and exercise with them, absolutely, yes, sir.  
 19 SIR JOHN SAUNDERS: Thank you.  
 20 MR GREANEY: So Chief Inspector Booth had devised action  
 21 cards a year before the arena attack. His intention was  
 22 that they be tested during Exercise Winchester Accord,  
 23 but as the evidence has revealed, that didn't happen.  
 24 IAIN SIRRELL: That's correct.  
 25 Q. Was that a missed opportunity?

1 IAIN SIRRELL: I believe, and certainly in discussion, we've  
 2 all seen that, and yes, we believe it was.  
 3 Q. Chief Inspector Booth's intention was that the action  
 4 cards should be familiar to those working within the  
 5 police control room.  
 6 IAIN SIRRELL: That was the intention.  
 7 Q. That they should be, at the risk of misusing the word,  
 8 embedded, trained, but the evidence reveals, as you'll  
 9 agree, that the likes of Ian Randall and  
 10 David Myerscough had never seen them?  
 11 IAIN SIRRELL: The evidence they gave us was exactly that.  
 12 Q. Is that an acceptable state of affairs?  
 13 IAIN SIRRELL: No, sir, it's not.  
 14 Q. Are you able to understand how that came about that  
 15 someone went to the trouble of preparing these cards,  
 16 but they never even found their way into the control  
 17 room?  
 18 IAIN SIRRELL: No. To go to the effort of doing something  
 19 like that and then to request that they're exercised and  
 20 then not follow up on how successful they've been and  
 21 what result they've brought, we were all surprised by  
 22 that.  
 23 Q. In your view, Mr Sirrell, does the failure to introduce  
 24 and embed action cards represent a significant failure  
 25 by GMP?



1 IAIN SIRRELL: Yes, sir.  
 2 Q. David Myerscough continues, as we understand it, to work  
 3 in the control room. He gave evidence on Day 100 of the  
 4 oral evidence hearings. Mr Lopez, could you take us,  
 5 please, to page 64, line 11 {Day100/64:11}?  
 6 "Question: Are there now action cards available to  
 7 you in the event of particular incidents, for example an  
 8 Operation Plato declaration?  
 9 "Answer: There are, yes.  
 10 "Question: Are those cards readily available to  
 11 you?  
 12 "Answer: They are kept within our room and in the  
 13 event of a training exercise or a real-life event, they  
 14 would be handed out by a supervisor in that room.  
 15 "Question: Is that something that you would expect  
 16 to be able to be achieved quickly?  
 17 "Answer: Yes.  
 18 "Question: Have you received any training in the  
 19 use of those action cards, including the Operation Plato  
 20 action card?  
 21 "Answer: No.  
 22 "Question: If an incident similar to the arena  
 23 attack were to occur again and you were in the OCR, do  
 24 you think, with the position as it now is, you would be  
 25 able to cope?

157

1 "Answer: No."  
 2 That evidence was given by Mr Myerscough on 10 May  
 3 of this year, so very nearly 4 years after the attack.  
 4 Did you hear that evidence?  
 5 IAIN SIRRELL: I did, yes.  
 6 Q. What was your reaction to it?  
 7 IAIN SIRRELL: It was disappointing. It's the view of one  
 8 individual who was involved in the actual attack, and to  
 9 think that, were they in the same situation again, they  
 10 still feel unprepared is at least disappointing.  
 11 Q. Is it your view, by which I mean the view of all three  
 12 of you, that it is important in the highest degree that  
 13 all police forces in this country should ensure that  
 14 there are action cards for staff in control rooms?  
 15 IAIN SIRRELL: It is, yes.  
 16 Q. And that those staff should be properly trained in their  
 17 use?  
 18 IAIN SIRRELL: That's the case and that's what we discussed.  
 19 To some extent that has been made available and  
 20 certainly through the work that Richard Thomas spoke of  
 21 in his evidence, that's been made available and  
 22 certainly training is now accessible to the control  
 23 rooms for that purpose.  
 24 SIR JOHN SAUNDERS: This might be entirely facile, but it  
 25 sounds from Mr Myerscough what happens now is an

158

1 emergency happens and somebody gets in the room and  
 2 hands out, "Here, this is your job to do, this is your  
 3 job to do, and this is your job to do", which sounds  
 4 like it may be entirely random. I have to say I would  
 5 have envisaged saying, whoever you have in there is  
 6 assigned potential jobs as part of their job on that  
 7 particular night before they start and, if they are on  
 8 duty, those are the jobs they would do in their  
 9 position.

10 This sounds a bit like -- well, like dealing cards,  
 11 I don't know. Perhaps we need a bit more detail about  
 12 it. Do you have any understanding about it or how it  
 13 should operate?

14 IAIN SIRRELL: From the evidence that was given I can  
 15 understand why you would take that view. I think the  
 16 difficulty comes with knowing which staff are going to  
 17 be available at any one time, so the random nature of  
 18 it, I think, will naturally exist. I think the idea  
 19 that, as you say, the cards are passed around and people  
 20 are then expected to read it at the time and understand  
 21 what's expected of them, that's a difficulty that  
 22 we would have with that. Therefore the idea of  
 23 awareness beforehand so that people are generally aware  
 24 on an evening when you might not be doing your normal  
 25 job, you might be required to do something different and

159

1 it could be any one of these number of roles so people  
 2 can just at the very least have an understanding that  
 3 that expectation may be made.  
 4 SIR JOHN SAUNDERS: We have, of course, heard that it's  
 5 now -- the set-up in the control room is entirely  
 6 different and you have a number -- an assistant or  
 7 a number 2 FDO, for example, and there's another officer  
 8 who's been introduced and it may be that they have  
 9 specific jobs which they will always have on the night.  
 10 IAIN SIRRELL: Certainly the action cards that we have seen,  
 11 that have now been developed, that Mr Clements talked to  
 12 in his evidence, that is the case and they do have  
 13 specific roles assigned to them.  
 14 SIR JOHN SAUNDERS: To particular officers? Right,  
 15 thank you.  
 16 MR GREANEY: Thank you very much, Mr Sirrell. I'm sticking  
 17 with you and turning more specifically to the night of  
 18 the attack.  
 19 As we all know, at 10.46 pm, precisely 15 minutes  
 20 after the explosion, Mr Sexton, the force duty officer,  
 21 declared Operation Plato. In your view, was that an  
 22 appropriate declaration?  
 23 IAIN SIRRELL: Yes, we all agree. We have it at 10.47, but  
 24 we all agree, yes, it was.  
 25 Q. Why was that an appropriate declaration in circumstances

160

1 in which, by that stage, armed police officers had  
 2 control of the City Room?  
 3 IAIN SIRRELL: I think that would be the... The information  
 4 that was presented or from what we can see, the  
 5 information we've been presented with, it was an  
 6 appropriate call to make based on the circumstances that  
 7 there had been a detonation, bombs themselves — without  
 8 going into too much detail, as we've seen throughout the  
 9 evidence, it's a precursor to a wider attack and again  
 10 we go back in the time to the times we were facing back  
 11 in 2017, and everything that had gone before and we have  
 12 heard evidence about the Bataclan and we have seen  
 13 evidence from the recent attacks in London ahead of the  
 14 attack in Manchester, and we can understand why people  
 15 would take that view that something larger would be  
 16 happening.  
 17 Q. Richard Thomas explained to us last week that the  
 18 approach that is to be expected is really if you are in  
 19 a situation of doubt, then declare Operation Plato  
 20 because you can always rescind it.  
 21 IAIN SIRRELL: Absolutely yes.  
 22 Q. You're saying to us, particularly bearing in mind that,  
 23 you regard the decision of Mr Sexton to declare  
 24 Operation Plato as being a reasonable decision?  
 25 IAIN SIRRELL: Yes.

161

1 Q. However, as we know, that declaration was not  
 2 communicated to the Ambulance Service or the Fire and  
 3 Rescue Service for a long time. Was that the opposite  
 4 of what the policy expected and indeed required?  
 5 IAIN SIRRELL: Yes.  
 6 Q. Why is the communication of such a declaration of  
 7 importance?  
 8 IAIN SIRRELL: We have already talked to the idea of  
 9 situational awareness. At the very least everybody is  
 10 aware what is going on. Partner agencies are aware what  
 11 is going on. Officers on the ground are aware so that  
 12 the situation can be very clear and then we can start  
 13 taking action and, certainly in terms of zoning, to make  
 14 sure the response is as effective as it can possibly be.  
 15 Q. There are, as the questions that were posed to you in  
 16 writing acknowledge, a number of potential explanations  
 17 for why there was no prompt communication of the  
 18 declaration; do you agree?  
 19 IAIN SIRRELL: Yes.  
 20 Q. Sir, I'm in the same report, it's the final report,  
 21 {INQ041870/9}. This is question GMP13:  
 22 "Was it acceptable [you were asked] for BTP, NWAS  
 23 and GMFRS not to be informed about the declaration of  
 24 Operation Plato? Please consider this question by  
 25 reference to [it should read] three scenarios: (1) If

162

1 Inspector Sexton made a deliberate decision to withhold  
 2 a declaration of Operation Plato, was that acceptable?  
 3 (2) If Inspector Sexton overlooked informing other  
 4 emergency services of the declaration of  
 5 Operation Plato, with whom does responsibility for this  
 6 oversight lie? (3) If there is some other explanation,  
 7 for example Inspector Sexton was overwhelmed by the  
 8 circumstances, as opposed to the demands of the FDO  
 9 role, to the extent that he neglected the multi-agency  
 10 response?"  
 11 Let's just take those in turn. As you know, the  
 12 resting position of Inspector Sexton, the evidence he  
 13 gave the inquiry, was that he deliberately decided to  
 14 withhold the declaration of Plato from emergency service  
 15 colleagues. The general thrust of why he was saying he  
 16 had done that was because he feared that if he did  
 17 communicate the declaration, it might result in those  
 18 who were already in the City Room and assisting being  
 19 pulled out. If that scenario is the accurate one,  
 20 do you regard that as a justification for not  
 21 communicating the declaration?  
 22 IAIN SIRRELL: I can't speak to what was in his mind at the  
 23 time. However, I don't agree with it.  
 24 Q. I'm not inviting you to; it's for the chairman to decide  
 25 what the reason was. But your position is that you

163

1 would not regard that as a reasonable justification for  
 2 not communicating?  
 3 IAIN SIRRELL: No.  
 4 Q. If, on the other hand, the explanation is that  
 5 Inspector Sexton overlooked the communication because of  
 6 the burden that he was under as FDO, again would you  
 7 regard that as an adequate justification for that  
 8 failure?  
 9 IAIN SIRRELL: I would understand it. I think we can go  
 10 back to the evidence from Mr Thomas. I cannot  
 11 understand a situation why he would deliberately  
 12 withhold that information, but I can understand  
 13 a situation perhaps where it didn't happen because of  
 14 everything else that was going on around you. I could  
 15 perhaps understand that, albeit it's something that  
 16 should be one of very first things that you do.  
 17 Q. If the explanation is that Inspector Sexton was  
 18 overwhelmed, not by the demands of his role but perhaps  
 19 by the emotion of the circumstances to the extent he  
 20 neglected communicating the declaration, again would you  
 21 regard that as a reasonable justification for his  
 22 failure?  
 23 IAIN SIRRELL: I think if that was the case, again you could  
 24 understand why that would happen.  
 25 SIR JOHN SAUNDERS: I'm not sure you could. You're dealing

164

1 with an FDO who is there to deal with this sort of  
 2 incident. I'm not saying you can't understand it, but  
 3 it can't be an acceptable reason that he is  
 4 simply overcome if he's in that job, can it?  
 5 IAIN SIRRELL: I would agree, sir, it wouldn't be acceptable  
 6 but it perhaps would be understandable if somebody  
 7 was — we talk about fight or flight or even freeze. In  
 8 some situations we see where someone is so overwhelmed  
 9 by the burden of his decision or decisions and  
 10 everything that is going on around him that he would  
 11 actually freeze in that situation — I agree, it's not  
 12 acceptable, but perhaps it's understandable.  
 13 MR GREANEY: If he froze, he froze for a long time, didn't  
 14 he?  
 15 IAIN SIRRELL: Yes.  
 16 Q. So the upshot is in each of the scenarios, whichever one  
 17 proves to be correct, you regard the non-communication  
 18 of Plato to other emergency services as being  
 19 unreasonable?  
 20 IAIN SIRRELL: Yes, sir.  
 21 Q. It's not for you to say, as you've acknowledged, whether  
 22 in fact Mr Sexton became overwhelmed. But what you can  
 23 help us with is this: first, was the burden upon him too  
 24 great that night?  
 25 IAIN SIRRELL: I think in terms of the Plato plan and the

165

1 tasks that were ascribed to him, in fact the tasks that  
 2 were ascribed to him within his own aide-memoire, yes.  
 3 Q. Was he left in the position as initial tactical firearms  
 4 commander for much too long?  
 5 IAIN SIRRELL: Yes, sir.  
 6 Q. A connected and important issue relates to the training  
 7 of FDOs or FIMs, as they are known in other forces. Do  
 8 force incident managers have a critical role to play in  
 9 police forces?  
 10 IAIN SIRRELL: Yes, sir, they do.  
 11 Q. Why?  
 12 IAIN SIRRELL: They are the first point of call, in a lot of  
 13 cases, with many incidents from a command perspective.  
 14 In a way that I've described, in the past it's almost  
 15 like the gatekeeper for the force.  
 16 Q. Within policing, obviously people need to be trained for  
 17 their roles but, over and above that, are some roles  
 18 accredited?  
 19 IAIN SIRRELL: They are, yes.  
 20 Q. What does that mean?  
 21 IAIN SIRRELL: It means, so for example, in the terms of  
 22 a firearms commander, whether it be at tactical level or  
 23 strategic or even operational, you attend a course, and  
 24 the course — you gain from that course the occupational  
 25 accreditation, so you're assessed and you go through

166

1 a process, and the process to become a tactical firearms  
 2 commander, for example, a process I have done twice, and  
 3 it's not an easy process, it's a challenge, and then,  
 4 after that, you're — as we've seen in the evidence from  
 5 Mr Dawson and from Mr Sexton, there's a period of  
 6 assessment in the workplace to gain that operational  
 7 accreditation.  
 8 Q. Within UK policing in May of 2017, was the role of  
 9 a force incident manager an accredited role in that way?  
 10 IAIN SIRRELL: No, it was not.  
 11 Q. Is it now an accredited role?  
 12 IAIN SIRRELL: To my understanding, no, sir.  
 13 Q. Is it your view — again, this is directed to all three  
 14 of you — that the role of the force incident manager or  
 15 FDO should be accredited?  
 16 IAIN SIRRELL: I believe I speak for us all, but yes, we  
 17 believe it should.  
 18 Q. What difference do you anticipate accreditation of that  
 19 role will make?  
 20 IAIN SIRRELL: I think in the case of the evidence given by  
 21 Mr Dawson and by Mr Sexton, they've both talked — and  
 22 I think Mr Booth did as well — talk to the idea that  
 23 there's a period of mentoring. I think it was described  
 24 as a mentored process. Now, for me, there's  
 25 a difference between coaching and mentoring. Coaching

167

1 is looking at ensuring somebody does their job to the  
 2 best of their ability, mentoring is more about helping  
 3 them find their way.  
 4 So although it might be a play on words, I do  
 5 believe that is the process. It's more — it feels  
 6 organic and less structured than you would get with  
 7 a strategic firearms commander's course, a TFC's course,  
 8 or any other accredited course whereby it is a pass or  
 9 fail. This feels as though it evolves. In fact, having  
 10 experienced it on two occasions, it does evolve.  
 11 SIR JOHN SAUNDERS: Right. There's nothing wrong, is there,  
 12 once someone's done the training, seen what they've got  
 13 to do, actually sitting with an experienced FDO to get  
 14 the hang of what it's like in practice? That's how  
 15 I understood the mentoring.  
 16 IAIN SIRRELL: It is, sir, and I don't disagree, to get the  
 17 hang of how it happens is correct. But at some point  
 18 somebody makes the decision —  
 19 SIR JOHN SAUNDERS: You want him tested, really?  
 20 IAIN SIRRELL: Is this person good enough to be left on  
 21 their own? And you're subject to that one person's  
 22 ideal of what is good.  
 23 SIR JOHN SAUNDERS: Right, I understand that.  
 24 MR GREANEY: Let's move this along, still dealing with  
 25 Plato. But before I do so, can I ask Mr Wilson and

168

1 Mr Dickinson whether they have anything to add on that  
2 topics that we've been discussing.

3 IAN DICKINSON: No, thank you.

4 Q. So where we'd reached was — or a place that we'd  
5 reached, Mr Sirrell, was that you consider, you three,  
6 that the declaration of Operation Plato was a reasonable  
7 decision for Mr Sexton to have made.

8 IAIN SIRRELL: We do, and for me — and equally, we  
9 understood the reason why Mr Dawson chose not to.

10 Q. And we'll get to that tomorrow, I assure you. But  
11 obviously it is one thing to declare Operation Plato.  
12 Do the consequences of that declaration thereafter need  
13 to be managed?

14 IAIN SIRRELL: Yes, sir.

15 Q. And was the implementation and/or continuation of  
16 Operation Plato, in your view, properly managed?

17 IAIN SIRRELL: No, sir.

18 Q. In seeking to develop that further: first, when  
19 Operation Plato was declared, to what area or areas does  
20 it relate? So what I'm driving at here is  
21 Operation Plato is declared shortly after quarter to 11  
22 on the night of 22 May. Is that a declaration which  
23 bites just on the City Room, on the whole of the arena  
24 complex, or on the whole of Manchester?

25 IAIN SIRRELL: I think naturally the whole of Manchester

169

1 should be — and when I say the whole of Manchester, as  
2 in the responders should be aware of it, but primarily  
3 it focuses upon the area that you would describe as hot,  
4 where the seat of the attack is.

5 SIR JOHN SAUNDERS: I find that difficult to understand.  
6 I've struggled with this because Plato is  
7 essentially: there may be a secondary attack. It's  
8 absolutely conceivable that the secondary attack would  
9 take place in a different part of Manchester. So if  
10 you are being alert to another attack taking place, why  
11 shouldn't that all be where the Operation Plato applies?

12 IAIN SIRRELL: Sir, I think — I understand your point,  
13 absolutely. I think there's a difference, perhaps,  
14 between being alert to it but then declaring the attack  
15 site too large to inhibit the response, and we heard  
16 from the evidence from Mr Thomas the idea is to make  
17 that hot zone as small as you possibly can, as quick as  
18 you can, and then create the cold zone. And it's — we  
19 talked about the —

20 SIR JOHN SAUNDERS: I understand about the zoning — I'm  
21 sorry — as being really important once you've done it  
22 and once you've got a hot zone, you want to reduce it,  
23 I understand that. I don't see why that inhibits the  
24 extent of the area covered by Operation Plato.

25 IAIN SIRRELL: I don't believe it necessarily inhibits it

170

1 because the hot zone can be as small as it needs to be  
2 and the warm zone as we've discussed — but then there  
3 doesn't necessarily have to be a boundary or an end  
4 point on the cold zone because the cold zone prevents  
5 normal(?) activity, it just means that rather than —  
6 and we've talked about this and we've heard discussion  
7 about the idea about Plato being rescinded and, in our  
8 view, we were quite clear, effectively, on it. It's one  
9 of two choices: it's either rescind or manage. But  
10 at the very least do at least one of them.

11 MR GREANEY: Sir, I didn't mean to cut across you.

12 SIR JOHN SAUNDERS: You can cut across me. You seemed to be  
13 concerned about the time.

14 MR GREANEY: No, I'm not concerned about the time, sir, I'm  
15 moving at the pace that I was hoping to.

16 SIR JOHN SAUNDERS: You know this is something, a subject  
17 which does interest me, and I've indeed asked it to be  
18 conveyed to the policing experts as well about the  
19 extent of Plato as compared to the zoning.

20 MR GREANEY: Exactly, and obviously a very important topic  
21 I'm going to come on to, probably the last topic I'll  
22 deal with today will be the issue of zoning.

23 But first of all, I'm concerned to understand with  
24 clarity what you mean when you say Plato has to be  
25 rescinded or managed, you have to do one of them; okay?

171

1 You're nodding your head. Have I misunderstood?

2 IAIN SIRRELL: No, that was exactly the point, sir, yes.

3 Q. So once Operation Plato has been declared, obviously  
4 it is not declared for all time, there comes a point at  
5 which it ends?

6 IAIN SIRRELL: It should, yes, sir.

7 Q. Does that therefore involve the concept that the  
8 declaration of Plato needs to be reviewed?

9 IAIN SIRRELL: It does, yes.

10 Q. In the context of our facts, whose job was it to review  
11 the declaration of Operation Plato?

12 IAIN SIRRELL: In the circumstances that we had, the primary  
13 responsibility landed with the FDO.

14 Q. In a moment I'm going to ask you at what stage or stages  
15 he should have been carrying out that review. To be  
16 fair to him, he did acknowledge that review was  
17 necessary. But the answer to my question was that the  
18 primary responsibility rested with the force duty  
19 officer. Does that involve an acknowledgement that  
20 others may also bear some responsibility, others apart  
21 from the FDO bear some responsibility, for reviewing  
22 Operation Plato?

23 IAIN SIRRELL: I believe it does, and perhaps if it wasn't  
24 in a formal setting as they are reviewing it, because it  
25 was an incident that was being managed by the FDO, at

172

1 least feed into that process and challenge. And we've  
 2 heard before -- I say we've heard before, but certainly  
 3 in the training that you receive as a tactical firearms  
 4 commander, one of the first things you are told is that  
 5 the job of Gold, the job of the strategic firearms  
 6 commander, is to be intrusive and by that to ask  
 7 questions, and certainly you would expect that.  
 8 Again, we've talked about situational awareness, and  
 9 one of the questions that I and colleagues have always  
 10 applied is, "What is it that you're seeing that I'm not?"  
 11 Because I perceive this, but you're telling me something  
 12 different. What is it that you're seeing that I'm not?"  
 13 Q. Right. So from that answer, it sounds as if your view  
 14 is that ACC Ford, strategic commander on the night, that  
 15 she had a degree of responsibility for reviewing Plato?  
 16 IAIN SIRRELL: Yes.  
 17 Q. Is there anyone else that you consider had such  
 18 a responsibility?  
 19 IAIN SIRRELL: I think there were missed opportunities.  
 20 We discussed this and we discussed the missed  
 21 opportunities by a number of different people at various  
 22 stages as they became aware to then -- and I use the  
 23 word "appropriately" to challenge and to say where we  
 24 are, and that in itself becomes a review, it invites  
 25 a review.

1 Q. Let's work through it in stages then. What is the first  
 2 point after 10.47 at which you would have expected  
 3 a review of Operation Plato to have taken place?  
 4 IAIN SIRRELL: I would expect at the point at which the SFC,  
 5 the strategic firearms commander, ACC Ford, was made  
 6 aware that, if not directly, that should have perhaps  
 7 begun a process of challenge to begin to ask questions.  
 8 Q. That's an hour later. Do you mean when she arrives at  
 9 the force command --  
 10 IAIN SIRRELL: When she was notified at 22.52.  
 11 Q. So she ought to have been asking questions at that  
 12 stage? What about the FDO, at what stage or stages  
 13 should he have been reviewing the declaration of  
 14 Operation Plato?  
 15 IAIN SIRRELL: At every opportunity. We heard the evidence  
 16 of Mr Thomas about spinning the wheel, and the national  
 17 decision-making model, as well as the joint  
 18 decision-making model, should be effectively constantly  
 19 spinning and looking to pick up new information, assess  
 20 that information and intelligence, understand what is  
 21 fact, what is fiction, what is the difference between  
 22 the two, and then make your judgements and your  
 23 decision-making thereafter.  
 24 Q. We know that Chief Inspector Dexter arrives at the scene  
 25 at, I think, 11.23.

1 IAIN SIRRELL: That's correct.  
 2 Q. Did he, in your judgement, have any responsibility for  
 3 a review of Operation Plato at that stage?  
 4 IAIN SIRRELL: At the very least he had an opportunity to  
 5 get to the scene, to then feed directly in to the FDO,  
 6 the initial tactical firearms commander, to explain,  
 7 "This is what we have at the scene, this is what  
 8 we have, this is where we're at", and then begin  
 9 a conversation to understand again, "What is it that  
 10 you've got? This is what I've got at the scene", and  
 11 gain that greater understanding about what it is that's  
 12 going on.  
 13 Q. If the declaration of Operation Plato had been managed,  
 14 including being reviewed in the way in which you would  
 15 have expected, what difference would it have made on the  
 16 night?  
 17 IAIN SIRRELL: I think it would have been one of two things.  
 18 We wrote in one of the reports that Plato would have  
 19 been stood down or put to standby much earlier than it  
 20 was. I mean, it's one possibility. The other  
 21 possibility is that it would have invited -- again,  
 22 getting ahead with regards to zoning -- it would have  
 23 invited perhaps a different position with regards to the  
 24 zoning. In other words, keeping Plato alive but perhaps  
 25 making almost most of Manchester cold, perhaps. And,

1 that way, you could have kept the resources, you could  
 2 have kept the actual declaration, the incident response  
 3 itself running, and being then still, sir, as you put  
 4 it, alert to anything else that might eventuate.  
 5 Q. This is the point that the chairman has made a number of  
 6 times. There were reports coming in of things happening  
 7 in other parts of Manchester. So the suspicious package  
 8 in Cathedral Gardens, the prospect that something was  
 9 happening at the hospital in Oldham, and it might  
 10 therefore be suggested that there was, for a prolonged  
 11 period of time, a justification for maintaining  
 12 Operation Plato. Do you agree or disagree with that?  
 13 IAIN SIRRELL: I could see that and I would agree with that.  
 14 Q. But the point, as I've understood it, that you're making  
 15 is that zoning is obviously connected with  
 16 Operation Plato but is also separate from it? Shall  
 17 I tell you what I mean by that?  
 18 IAIN SIRRELL: I think perhaps, yes.  
 19 Q. Right. So the concept of zoning is critical to  
 20 Operation Plato, is it not?  
 21 IAIN SIRRELL: It is.  
 22 Q. But the declaration of Operation Plato does not carry  
 23 with it a decision that a particular location is going  
 24 to be designated as a particular kind of zone?  
 25 IAIN SIRRELL: That's correct.

1 Q. So you make a decision to declare Plato. You need to  
 2 make a separate, albeit connected, decision about how  
 3 you are going to zone areas. Is that a fair way of  
 4 putting it?  
 5 IAIN SIRRELL: That would be accurate, yes.  
 6 Q. In your view, was sufficient thought given to zoning on  
 7 the night of 22 May?  
 8 IAIN SIRRELL: Again, I think I speak for my colleagues, we  
 9 don't believe it was, and we see that in what we  
 10 describe as a confused picture in terms of the different  
 11 descriptions we've seen applied to the same area.  
 12 Q. Whose job was it, certainly in the first instance, to  
 13 decide what the zones were and at what stage should that  
 14 decision have been made?  
 15 IAIN SIRRELL: Initially, it would fall to the FDO, the  
 16 initial tactical firearms commander, but then you have  
 17 -- and again, Mr Thomas spoke to this and he spoke of  
 18 two phases. In discussion, we discussed this, and  
 19 I think that there was the first phase whereby -- he  
 20 spoke about the ITFC, the FDO and then spoke about the  
 21 ground--assigned tactical firearms commander. We believe  
 22 there's a 1A, and there's somebody in between, and  
 23 that's the OFC, or other officers on the ground who can  
 24 feed information back about what it was they were  
 25 experiencing, what it was they were saying on the

1 ground, again it informs that --  
 2 Q. Pause for a moment. So are you talking about  
 3 Mr Richardson?  
 4 IAIN SIRRELL: Yes.  
 5 Q. Firearms Bronze?  
 6 IAIN SIRRELL: Yes, exactly.  
 7 Q. I well understand what you're saying to us is that the  
 8 FDO, based on the situational awareness he has, has the  
 9 responsibility in the first instance for saying, "This  
 10 is how I am going to zone particular areas". But  
 11 obviously, he doesn't have the same situational  
 12 awareness as the OFC who's actually on the ground?  
 13 IAIN SIRRELL: Indeed.  
 14 Q. So are you postulating a situation in which the OFC  
 15 himself makes a decision, "I'm going to change the  
 16 zoning", or does he just feed into a decision that the  
 17 FDO then reviews and/or makes again?  
 18 IAIN SIRRELL: It's the latter, but it should be an  
 19 active -- he should be actively doing that.  
 20 Q. So the FDO, then the OFC, is feeding in. And what about  
 21 the ground--assigned tactical firearms commander when he  
 22 arrives at 11.23?  
 23 IAIN SIRRELL: Again, the description of the -- albeit the  
 24 ground--assigned tactical firearms commander position  
 25 wasn't in JOPs 3 at the time, it was being introduced,

1 but the idea being that -- and it was covered in  
 2 Mr Dexter's evidence that he would report or feed to,  
 3 report to, "work to" I think is how it was described,  
 4 the ITFC because they have that greater situational  
 5 awareness, they perhaps understand more things of that  
 6 wider view, so they would feed to that.  
 7 But again it's: you're on the ground, you have that,  
 8 as Mr Dexter was, leading that, the response to locate,  
 9 confront and neutralise the active threat. So you would  
 10 be really leading that with regards to the information  
 11 going back to the TFC, the ITFC, to be able to make  
 12 decisions about the zones, certainly in the --  
 13 SIR JOHN SAUNDERS: Let's just talk in practical terms for  
 14 a moment because it does seem that the firearms officers  
 15 really did their job well. Let's forget about whether  
 16 Mr Richardson should have fed more information back.  
 17 Entirely the correct thing is done when you declare  
 18 Plato in the way that was done: send the armed officers  
 19 in, the armed officers clear the area, particularly  
 20 around where the bomb's gone off and where the victims  
 21 are of that attack. Clear it, guard it to stop anyone  
 22 coming back, and then you report back to the FDO at the  
 23 time, saying, "We've cleared it, it's now no longer  
 24 a hot zone". We'll come to whatever it is after that.  
 25 That information is then fed to the rescuers, who then

1 know it's safe to go in and carry out that rescue and  
 2 that's all very quick on the timings we've had.  
 3 MR GREANEY: That is precisely the point I'm coming to, sir,  
 4 because I am keen to capture your view about how the  
 5 City Room should have been zoned. So by -- well, let's  
 6 say by 10.50 pm, as you know, armed officers had secured  
 7 the City Room and regarded it as safe in terms of an  
 8 active shooter.  
 9 IAIN SIRRELL: That's correct.  
 10 Q. Although the possibility of a secondary device had not  
 11 been excluded and, in particular, you'll remember that  
 12 was the evidence of PC Moore, that he had done his raw  
 13 check, as he described it, and he was satisfied that  
 14 there was no active shooter and that an active shooter  
 15 wasn't coming into that area, but there might be  
 16 a secondary device. So what I want -- but don't answer  
 17 this straightaway -- what I want to know is what your  
 18 joint view is of what that zone, the City Room, was at  
 19 that stage once it's under the control of firearms  
 20 officers.  
 21 As a starting point, can we look again at the  
 22 definitions of zones in JOPs 3.  
 23 So Mr Lopez, this is {INQ008372/4}, the bottom half  
 24 of the page, please:  
 25 "Hot zone. Where the attackers are present and/or

1 there is an immediate threat to life."  
 2 Over the page, please, {INQ008372/5}, the bottom  
 3 half of the page:  
 4 "Warm zone. Where the attackers are believed to  
 5 have passed through but could enter/re-enter imminently.  
 6 These areas cannot be guaranteed as safe."  
 7 And then back to the top of page {INQ008372/4},  
 8 please:  
 9 "Cold zone. Area where it has been assessed that  
 10 there is no immediate threat to life."  
 11 In your view, Mr Sirrell, at the point in time that  
 12 we've come to, when that room is under the control of  
 13 armed officers, what zone do you consider it is?  
 14 IAIN SIRRELL: At the point where armed officers have  
 15 prevented an individual being able to re-enter, we  
 16 discussed this, we would concur with the evidence that  
 17 was given by Mr Thomas that that could be a cold zone.  
 18 Q. You've expressed that carefully as "could be  
 19 a cold zone". Is that in recognition of the fact that  
 20 for as long as there is a risk of a secondary device,  
 21 the area cannot, to use the language of the warm zone,  
 22 be guaranteed as safe?  
 23 IAIN SIRRELL: Not entirely, sir. Looking at the  
 24 definition, as you look at it -- if you look at it  
 25 objectively, and as it is written there, it would be

181

1 a cold zone, but I think it's accepting the context of  
 2 the situation and why somebody may -- our view was that  
 3 it could be and should be cold.  
 4 SIR JOHN SAUNDERS: I'm really sorry about this. As  
 5 I understood it before, and I had hoped I'd got a grip  
 6 on this, the zoning is at this time in terms of  
 7 a marauding gunman. Once the risk of that is gone,  
 8 it is a cold zone. That does not mean that all risks  
 9 have gone and people can refuse to go in there on the  
 10 basis of other extant risks, such as an IED, which they  
 11 are not prepared to take. Is that right?  
 12 IAIN SIRRELL: Individuals may take that position, sir.  
 13 SIR JOHN SAUNDERS: Is it a cold zone in terms of  
 14 a marauding gunman?  
 15 IAIN SIRRELL: It is still a cold zone. And we have heard  
 16 discussion about the idea of bags being in that room and  
 17 we've discussed that and we have taken a view and  
 18 a position on that as well.  
 19 SIR JOHN SAUNDERS: Okay. I'm sorry to interrupt.  
 20 MR GREANEY: Not at all, sir. The most important thing is  
 21 that you are clear about it and I am just going to make  
 22 sure that I am.  
 23 When you use the language of "could have been  
 24 a cold zone", it rather sounds from what you've said  
 25 that the joint view of the three of you is that at that

182

1 point in time when there is no risk of a marauding  
 2 terrorist with a firearm that that was a cold zone in  
 3 accordance with JOPs 3 and that it should have been  
 4 declared as such.  
 5 IAIN SIRRELL: Yes.  
 6 Q. But I think you were saying that you could understand  
 7 why someone might have taken a different view. By that  
 8 do you mean you could understand why someone might have  
 9 regarded it as a warm zone?  
 10 IAIN SIRRELL: We could understand why somebody might be  
 11 in that position. However, to follow the definitions,  
 12 it would be cold.  
 13 Q. So just so there's absolute clarity, is it your view  
 14 that the City Room from that point in time was  
 15 a cold zone and should have been declared as such?  
 16 IAIN SIRRELL: We have the evidence of the officers on the  
 17 sentry points, as I think Mr Thomas described them as,  
 18 preventing -- and they were there to prevent any  
 19 attackers entering or reentering. But one of the  
 20 striking things I think for us was the evidence from  
 21 Inspector Smith, who said, "That room was as safe as it  
 22 could be". So that was an officer inside --  
 23 Q. "Safe enough."  
 24 SIR JOHN SAUNDERS: I think that's better. It means more  
 25 than "safe as it could be".

183

1 IAIN SIRRELL: Absolutely, yes, sir.  
 2 MR GREANEY: Entirely taking the chairman's point about your  
 3 approach to the definition of a warm zone and  
 4 a cold zone, it might be thought that a strange state of  
 5 affairs exists so that on the one hand there is no risk  
 6 of a terrorist with a firearm coming in and shooting  
 7 people, yet there does remain a possibility that fatal  
 8 injury will be caused by a secondary device. Why is the  
 9 policy treating those two situations in a different way?  
 10 SCOTT WILSON: For the simple reason that if there was  
 11 a gunman you'd possibly know there was a gunman because  
 12 he retreated. There was no confirmation of a secondary  
 13 device -- I would use two examples here. If a witness  
 14 had come up to Inspector Smith and said that they'd seen  
 15 the bomber lay a bag down before he carried out the act,  
 16 then that would confirm a suspicion that that bag wasn't  
 17 reasonable to be there, because it came from the person  
 18 who'd carried out the attack. But taking it there were  
 19 bags scattered around that room, if you used the HOT  
 20 principles, in a room like that it would be typical to  
 21 see those bags because when a bomb goes off, people are  
 22 going to drop stuff off and run.  
 23 So unless it's confirmed, anywhere in that arena,  
 24 anywhere, the car park, could contain a bag, a car which  
 25 could contain something, so you have to have that

184

1 suspicion to be able to identify it through using what  
 2 we call the four Cs and the HOT principles and that was  
 3 never, ever done. Nobody confirmed there was anything  
 4 in that room at that time that they were suspicious of  
 5 that and they had to clear people away from it.  
 6 Inspector Smith treated it as business as objective.  
 7 He was obviously stepping over bags as he was helping  
 8 casualties.  
 9 Q. What I'd like you to reflect upon, and it may be that  
 10 you don't want to give an answer straightaway now, is  
 11 whether by having a different rule for a marauding  
 12 terrorist then with a firearm, now with a weapon, one is  
 13 creating a situation which is more complicated than it  
 14 needs to be. What I mean by that is this: what is the  
 15 problem with having just one rule which involves the  
 16 commanders meeting, they assess the risk, whatever the  
 17 nature of the event, whatever the nature of the attack,  
 18 and they make a judgement based upon that about who  
 19 should be deployed? So no special rule for a marauding  
 20 terrorist attack, a basic principle which involves  
 21 a decision being made on the facts as they present  
 22 themselves.  
 23 IAIN SIRRELL: We discussed this to some extent and perhaps  
 24 it would be worthy of further consideration. But  
 25 I think, broadly speaking, there's something in that,

185

1 because when we look at the idea of a — if we break it  
 2 down, first we have to have somebody who's marauding,  
 3 let's find that maraud (sic). But then the idea of  
 4 a terrorist — well, to get into the ideology and what's  
 5 within somebody's mind perhaps is difficult at that  
 6 time, but then it boils down to there's one person  
 7 in the country who will confirm that it is such and it  
 8 is a terrorist attack, and perhaps it does need more  
 9 simplifying.  
 10 SIR JOHN SAUNDERS: I'm quite sure it does because having  
 11 thought I'd got this, and certainly from Mr Thomas, I'm  
 12 afraid you have confused me.  
 13 IAIN SIRRELL: Sorry, sir.  
 14 SIR JOHN SAUNDERS: No, no, maybe it is confusing. But  
 15 I thought that the hot, warm and cold related only to  
 16 the marauding gunman and had that been excluded.  
 17 MR GREANEY: That was also my understanding.  
 18 SIR JOHN SAUNDERS: You're suggesting to me, from what you  
 19 have just said, that if Mr Smith had evidence that the  
 20 bomber had actually put something or a bag down which  
 21 could contain a bomb —  
 22 SCOTT WILSON: That would be hot zone.  
 23 SIR JOHN SAUNDERS: Could it ever be a warm zone?  
 24 SCOTT WILSON: Because if you look at hot it is "and/or  
 25 immediate threat to life". That's the and/or piece. So

186

1 it is:  
 2 "The attackers are present, and/or immediate threat  
 3 to life."  
 4 The confirmation of a bomb is the "and/or immediate  
 5 threat to life". You wouldn't have put that and/or in  
 6 orders and it would have said:  
 7 "The attackers are present and there is a threat to  
 8 life."  
 9 That's where I see the difference in that piece that  
 10 it's the attackers are present and/or an immediate  
 11 threat to life would make it a hot zone.  
 12 SIR JOHN SAUNDERS: Warm is relating to the possibility of  
 13 a return of a gunman.  
 14 SCOTT WILSON: Yes. Because if it's identified as a bomb,  
 15 it's an immediate threat to life and it becomes  
 16 a hot zone.  
 17 SIR JOHN SAUNDERS: And the cold simply relates to the  
 18 gunman again?  
 19 SCOTT WILSON: Yes, it says:  
 20 "There is no attackers present and there is no  
 21 threat to life."  
 22 MR GREANEY: What I am going to invite you to reflect  
 23 upon —  
 24 SIR JOHN SAUNDERS: It's that last bit, I'm really sorry.  
 25 The cold zone, as I've understood it so far — the cold

187

1 zone, it may be you've already excluded the bomb in  
 2 a bag, because that would be in a hot zone, but the  
 3 cold zone simply relates to the fact that there is no  
 4 risk of a gunman, no threat to life from a gunman.  
 5 (overspeaking).  
 6 IAIN SIRRELL: At the time it all related to the threat from  
 7 somebody marauding with a firearm but recognised that  
 8 IEDs were involved and could be, as Mr Wilson said, left  
 9 behind or something similar. But it goes beyond — it's  
 10 acknowledging your point earlier on about the  
 11 possibility, and we have to go beyond the possibility  
 12 and we have to look and actually be satisfied, confirm,  
 13 otherwise the possibility existed, as Mr Wilson  
 14 (overspeaking) —  
 15 SCOTT WILSON: London Bridge is a good example where the  
 16 terrorists are walking towards the police officers with  
 17 a knife and what they believe to be strapped on—IEDs.  
 18 That has to be a hot zone. There's no gun, there's no  
 19 gun, but it has to be a hot zone because there is an  
 20 immediate threat to life, which gave authority to the  
 21 police officers to neutralise the threat. There has to  
 22 be a hot zone in my eyes.  
 23 SIR JOHN SAUNDERS: The man with the gun with the belt — we  
 24 could go on forever with this so I will stop in a minute  
 25 — turns and runs off somewhere round the corner.

188



1 SCOTT WILSON: Still an immediate threat to life if they  
 2 believe he has got a suicide belt on and he could  
 3 detonate --  
 4 SIR JOHN SAUNDERS: That remains a hot zone wherever he is?  
 5 SCOTT WILSON: (Overspeaking) an identified threat because  
 6 he's wearing a suicide belt, then I would say it has to  
 7 remain a hot zone.  
 8 SPEAKER: Absolutely.  
 9 MR GREANEY: So situation with no gun but a material  
 10 prospect that there is a bomb, that's a hot zone because  
 11 there is an immediate threat to life?  
 12 SCOTT WILSON: That's always been my interpretation of it,  
 13 which would take the suicide bomber walking into a room  
 14 with a belt on, rather than a gun, that's the immediate  
 15 threat to life, or a confirmed IED which could explode  
 16 at any time and take life.  
 17 Q. But the reason why you're suggesting we don't have  
 18 a hot zone in the City Room, notwithstanding the  
 19 possibility of a secondary device, is because what, it's  
 20 a mere possibility and not therefore to be regarded as  
 21 presenting an immediate threat to life?  
 22 SCOTT WILSON: That's right.  
 23 IAIN SIRRELL: And that was born out when Mr Dexter got,  
 24 acquired the explosives dog, took the explosives dog to  
 25 a bag that was on the concourse and this is at 23.45.

189

I N D E X

3 MR SCOTT WILSON (sworn) .....1  
 4 MR IAIN SIRRELL (sworn) .....2  
 5 MR IAN DICKINSON (sworn) .....2  
 6 Questions from MR GREANEY .....2

191

1 Q. He was on the other side of the doors.  
 2 I'm going to finish for the day shortly, but it may  
 3 well be that the debate that has just taken place  
 4 illustrates the very point I'm inviting you to consider,  
 5 whether notwithstanding that Operation Plato emerged out  
 6 of perfectly well reasoned theory and emerged out of  
 7 Mumbai, whether the reality is that what it in fact  
 8 achieves is more complexity and more confusion than  
 9 a more simple rule. I've explained that very badly, but  
 10 I think you understand what I'm talking about. Perhaps  
 11 that's an issue we can return to first thing tomorrow  
 12 morning.  
 13 SIR JOHN SAUNDERS: Okay. Have you got as far as you hoped?  
 14 MR GREANEY: Very nearly, sir, yes.  
 15 SIR JOHN SAUNDERS: Okay, thank you very much.  
 16 MR GREANEY: I believe I will finish within one session  
 17 tomorrow morning.  
 18 SIR JOHN SAUNDERS: Okay, thank you.  
 19 Thank you very much, gentlemen. I'm grateful as  
 20 ever.  
 21 (4.58 pm)  
 22 (The inquiry adjourned until 9.30 am  
 23 on Thursday, 16 September 2021)

192

190

| A                    |                             |                         |                    |                          |                   |                          |        |                         |              |                             |                           |                       |                        |              |                             |                   |             |                         |                  |                |                           |        |                              |                       |                        |                        |                        |                   |                        |                            |                    |                  |                    |                           |                         |                  |                        |                       |                        |           |                             |                    |                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                     |                         |                    |                          |                   |                          |        |                         |              |                             |                           |                       |                        |              |                             |                   |             |                         |                  |                |                           |        |                              |                       |                        |                        |                        |                   |                        |                            |                    |                  |                    |                           |                         |                  |                        |                       |                        |           |                             |                    |                           |                           |             |                            |                   |                            |                         |                              |                       |               |               |                    |                        |                    |                   |                         |                     |        |                           |       |                       |                  |                    |                              |                     |        |                              |                      |                          |                      |                               |                             |                        |                        |                           |              |                           |                              |                        |                           |                          |                      |                      |                           |                          |                    |                           |                            |                          |       |                     |                      |                       |        |                             |                       |                           |                       |                          |                             |                           |                       |                           |                        |                        |                           |                    |                           |                         |                        |                     |                       |                         |                           |                      |                    |                        |                 |                      |                  |                  |                         |        |                             |                      |                   |                           |                              |                        |                         |                      |                     |                      |        |                             |        |                         |                         |                      |       |                     |                        |          |                          |                             |                           |                      |                           |                            |                           |                          |                     |                      |             |                             |                        |                      |        |                         |                       |                            |                           |      |                        |                       |                     |        |                             |                          |                         |                           |                         |                       |                     |                      |               |                        |                             |              |                           |       |                         |       |                   |                             |                    |                     |                   |              |                   |                       |                            |                    |                              |              |                      |                               |                            |                          |               |                           |        |                              |           |                             |              |                             |               |                         |       |                   |                         |        |                             |                        |                   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|----------------------|-----------------------------|-------------------------|--------------------|--------------------------|-------------------|--------------------------|--------|-------------------------|--------------|-----------------------------|---------------------------|-----------------------|------------------------|--------------|-----------------------------|-------------------|-------------|-------------------------|------------------|----------------|---------------------------|--------|------------------------------|-----------------------|------------------------|------------------------|------------------------|-------------------|------------------------|----------------------------|--------------------|------------------|--------------------|---------------------------|-------------------------|------------------|------------------------|-----------------------|------------------------|-----------|-----------------------------|--------------------|---------------------------|---------------------------|-------------|----------------------------|-------------------|----------------------------|-------------------------|------------------------------|-----------------------|---------------|---------------|--------------------|------------------------|--------------------|-------------------|-------------------------|---------------------|--------|---------------------------|-------|-----------------------|------------------|--------------------|------------------------------|---------------------|--------|------------------------------|----------------------|--------------------------|----------------------|-------------------------------|-----------------------------|------------------------|------------------------|---------------------------|--------------|---------------------------|------------------------------|------------------------|---------------------------|--------------------------|----------------------|----------------------|---------------------------|-------------------------|--------------------|--------------------------|-------------------|--------------------------|--------|-------------------------|--------------|-----------------------------|---------------------------|-----------------------|------------------------|--------------|-----------------------------|-------------------|-------------|-------------------------|------------------|----------------|---------------------------|--------|------------------------------|-----------------------|------------------------|------------------------|------------------------|-------------------|------------------------|----------------------------|--------------------|------------------|--------------------|---------------------------|-------------------------|------------------|------------------------|-----------------------|------------------------|-----------|-----------------------------|--------------------|---------------------------|---------------------------|-------------|----------------------------|-------------------|----------------------------|-------------------------|------------------------------|-----------------------|---------------|---------------|--------------------|------------------------|--------------------|-------------------|-------------------------|---------------------|--------|---------------------------|-------|-----------------------|------------------|--------------------|------------------------------|---------------------|--------|------------------------------|----------------------|--------------------------|----------------------|-------------------------------|-----------------------------|------------------------|------------------------|---------------------------|--------------|---------------------------|------------------------------|------------------------|---------------------------|--------------------------|----------------------|----------------------|---------------------------|--------------------------|--------------------|---------------------------|----------------------------|--------------------------|-------|---------------------|----------------------|-----------------------|--------|-----------------------------|-----------------------|---------------------------|-----------------------|--------------------------|-----------------------------|---------------------------|-----------------------|---------------------------|------------------------|------------------------|---------------------------|--------------------|---------------------------|-------------------------|------------------------|---------------------|-----------------------|-------------------------|---------------------------|----------------------|--------------------|------------------------|-----------------|----------------------|------------------|------------------|-------------------------|--------|-----------------------------|----------------------|-------------------|-----------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| abandoning (1) 20:24 | actions (5) 14:22 47:8 63:9 | 129:23 143:24 146:16,19 | 157:23 158:9 161:9 | 164:6,20,23 167:13 173:8 | 175:9,21 177:8,17 | 178:1,17,23 179:7 180:21 | 187:18 | 189:16,20 109:2 124:1,5 | 139:9 144:11 | agencies (18) 45:17,21 54:9 | 56:2 68:14 78:18,23 85:25 | 109:7 134:12 135:8,16 | 136:3 144:11,25 146:13 | 149:5 162:10 | agency (9) 29:6 78:22 83:12 | 90:20 104:3 109:9 | 135:3,11,15 | agencyspecific (1) 82:8 | agenda (1) 111:8 | agile (1) 93:8 | ago (4) 68:7 109:11 112:9 | 135:14 | agree (77) 1:12 13:23 14:5,9 | 15:4 23:23 26:7 35:19 | 36:5,8,17,24 37:3,7,15 | 38:5 39:21 40:21 41:14 | 43:24 44:12,17,23 45:3 | 47:20 51:11 61:15 | 65:19,22 66:20 67:7,12 | 84:7 85:17 86:8 90:2 91:17 | 92:15 96:16 97:2,5 | 99:17,23 100:1,3 | 104:12,20 108:5,24 | 118:9,20,24 119:21 120:11 | 121:6,12,14 124:8 132:5 | 137:11 142:14,19 | 151:21,22,23 153:15,23 | 154:3 156:9 160:23,24 | 162:18 163:23 165:5,11 | 176:12,13 | agreed (6) 43:14 49:4 58:12 | 92:23 142:11 154:4 | agreement (9) 36:15 37:11 | 38:3 40:15 43:19 44:10,16 | 76:16 85:23 | agreements (2) 58:24 90:16 | agrees (1) 125:11 | ahead (7) 20:3 82:13 90:22 | 154:24,25 161:13 175:22 | aid (5) 127:4,11,21 128:3,24 | aidememoire (1) 166:2 | aim (1) 13:11 | aims (1) 75:7 | aircraft (1) 96:14 | airport (2) 5:10 96:11 | airports (1) 96:12 | airways (1) 132:2 | albeit (6) 98:11 126:22 | 152:25 164:15 177:2 | 178:23 | alert (4) 19:23 170:10,14 | 176:4 | aligned (2) 130:12,13 | alive (1) 175:24 | allowing (1) 44:15 | almost (7) 34:22 49:13 60:24 | 118:11 122:7 166:14 | 175:25 | along (3) 72:4 109:11 168:24 | aloud (2) 48:16 50:9 | already (7) 25:1 90:6,18 | affording (1) 107:16 | afraid (3) 43:5 106:25 186:12 | after (17) 3:20 16:21 26:12 | 47:23 57:1 74:1 110:24 | 113:3,24 119:13 129:17 | 158:3 160:20 167:4 169:21 | 174:2 179:24 | afternoon (2) 72:1 132:14 | again (51) 8:23 11:3,14 17:1 | 32:12 40:24 43:7 45:19 | 52:1,25 56:9,10 61:8 72:3 | 79:8 86:19 90:14 98:7,19 | 100:14 101:13 106:16 | 107:25 108:14 113:20 | 116:4 120:3 124:25 127:13 | 129:23 143:24 146:16,19 | 157:23 158:9 161:9 | 164:6,20,23 167:13 173:8 | 175:9,21 177:8,17 | 178:1,17,23 179:7 180:21 | 187:18 | 189:16,20 109:2 124:1,5 | 139:9 144:11 | agencies (18) 45:17,21 54:9 | 56:2 68:14 78:18,23 85:25 | 109:7 134:12 135:8,16 | 136:3 144:11,25 146:13 | 149:5 162:10 | agency (9) 29:6 78:22 83:12 | 90:20 104:3 109:9 | 135:3,11,15 | agencyspecific (1) 82:8 | agenda (1) 111:8 | agile (1) 93:8 | ago (4) 68:7 109:11 112:9 | 135:14 | agree (77) 1:12 13:23 14:5,9 | 15:4 23:23 26:7 35:19 | 36:5,8,17,24 37:3,7,15 | 38:5 39:21 40:21 41:14 | 43:24 44:12,17,23 45:3 | 47:20 51:11 61:15 | 65:19,22 66:20 67:7,12 | 84:7 85:17 86:8 90:2 91:17 | 92:15 96:16 97:2,5 | 99:17,23 100:1,3 | 104:12,20 108:5,24 | 118:9,20,24 119:21 120:11 | 121:6,12,14 124:8 132:5 | 137:11 142:14,19 | 151:21,22,23 153:15,23 | 154:3 156:9 160:23,24 | 162:18 163:23 165:5,11 | 176:12,13 | agreed (6) 43:14 49:4 58:12 | 92:23 142:11 154:4 | agreement (9) 36:15 37:11 | 38:3 40:15 43:19 44:10,16 | 76:16 85:23 | agreements (2) 58:24 90:16 | agrees (1) 125:11 | ahead (7) 20:3 82:13 90:22 | 154:24,25 161:13 175:22 | aid (5) 127:4,11,21 128:3,24 | aidememoire (1) 166:2 | aim (1) 13:11 | aims (1) 75:7 | aircraft (1) 96:14 | airport (2) 5:10 96:11 | airports (1) 96:12 | airways (1) 132:2 | albeit (6) 98:11 126:22 | 152:25 164:15 177:2 | 178:23 | alert (4) 19:23 170:10,14 | 176:4 | aligned (2) 130:12,13 | alive (1) 175:24 | allowing (1) 44:15 | almost (7) 34:22 49:13 60:24 | 118:11 122:7 166:14 | 175:25 | along (3) 72:4 109:11 168:24 | aloud (2) 48:16 50:9 | already (7) 25:1 90:6,18 | affording (1) 107:16 | afraid (3) 43:5 106:25 186:12 | after (17) 3:20 16:21 26:12 | 47:23 57:1 74:1 110:24 | 113:3,24 119:13 129:17 | 158:3 160:20 167:4 169:21 | 174:2 179:24 | afternoon (2) 72:1 132:14 | again (51) 8:23 11:3,14 17:1 | 32:12 40:24 43:7 45:19 | 52:1,25 56:9,10 61:8 72:3 | 79:8 86:19 90:14 98:7,19 | 100:14 101:13 106:16 | 107:25 108:14 113:20 | 116:4 120:3 124:25 127:13 | 11:4,15 13:15 17:3 26:21 | 27:23 28:2,8 45:11 | 54:21,22 55:24 58:14 69:7 | 72:9 73:3 79:2 83:20 84:12 | 89:6 122:4 150:24 161:18 | 184:3 | approached (1) 53:2 | approaches (1) 51:22 | approaching (2) 82:24 | 152:21 | appropriate (14) 51:1 55:21 | 70:5 74:12 88:20 92:5 | 102:4 120:22 129:13 133:5 | 153:7 160:22,25 161:6 | appropriately (1) 173:23 | area (26) 31:22 32:3,3,4,22 | 33:7 34:9 43:10 46:4 52:3 | 58:12 82:1 84:5 87:12 | 93:16 109:24 111:25 127:3 | 169:19 170:3,24 177:11 | 179:19 180:15 181:9,21 | areas (6) 85:10,24 169:19 | 177:3 178:10 181:6 | arena (33) 1:18 9:6 16:14 | 18:2,4 24:20 26:5 28:20 | 48:18 52:3 53:17 57:18 | 59:20 80:17 81:9,25 | 82:6,19 83:5 84:15,25 | 85:3,7 87:23 90:9 102:8 | 136:17 137:6 141:7 155:21 | 157:22 169:23 184:23 | argument (1) 49:24 | argyle (2) 59:19 66:10 | argyll (1) 65:2 | arise (2) 85:3 95:22 | arisen (1) 10:19 | arises (1) 32:12 | arising (4) 81:24 87:14 | 167:18 | armed (16) 29:15,16 30:6,10 | 31:3 33:11,15 104:23 | 124:3 139:8 161:1 | 179:18,19 180:6 181:13,14 | around (23) 8:8,10 13:8 24:2 | 44:6 61:1,9 68:8 69:13 | 71:10 80:11 99:8 118:17 | 121:19 124:22 125:21 | 126:21 140:2 159:19 | 164:14 165:10 179:20 | 184:19 | arrangement (3) 79:23 85:25 | 101:14 | arrangements (11) 58:19 | 64:17 93:4 134:10,18,19 | 135:7 136:2,6 139:10 | 151:7 | arrivals (1) 144:12 | arrive (4) 46:2 148:22 | 149:1,12 | arrived (2) 19:13 144:19 | arrives (3) 174:8,24 178:22 | arriving (2) 145:5 147:15 | ascribed (2) 166:1,2 | ask (25) 1:22 14:14 20:19 | 23:2 26:15 34:25 36:2 43:4 | 44:21 45:7,24 56:13 72:15 | 80:25 96:19 101:13 106:1 | 120:19 129:9 138:23 | 151:20 168:25 172:14 | 173:6 174:7 | asked (11) 57:9 66:10 100:4 | 105:13,13 106:5 113:15 | 145:17 147:21 162:22 | 171:17 | asking (2) 39:21 174:11 | aspect (2) 31:1 146:2 | aspects (3) 58:15,20 79:19 | assembled (3) 54:20 60:10 | 61:6 | assess (10) 53:1 87:11 | 89:15,19 116:10 128:4 | 137:25 142:7 174:19 | 185:16 | assessed (5) 73:24,25 75:12 | 60:3 88:22 90:14 91:3,25 | 95:6 100:5 101:8 110:22 | 130:8 143:10 147:3 149:17 | 161:10,10 164:10 177:24 | 179:11,16,22,22 181:7 | background (1) 82:4 | backing (2) 62:11,17 | bad (2) 8:6,6 | badly (2) 103:22 190:9 | bag (6) 184:15,16,24 186:20 | 188:2 189:25 | bags (4) 182:16 184:19,21 | 185:7 | balance (3) 48:10 49:25 | 50:21 | balances (1) 63:5 | balancing (3) 48:9 50:15,18 | ballistic (1) 52:6 | bandages (1) 129:13 | banging (1) 52:24 | barriers (5) | 131:5,16,17,18,22 | base (2) 62:18 104:14 | based (6) 10:14 60:16 92:8 | 161:6 178:8 185:18 | basic (5) 48:12 90:15 127:21 | 128:5 185:20 | basically (1) 129:20 | basis (15) 16:3 19:18 23:8,14 | 24:4 31:19 43:22 60:8 63:9 | 70:10 95:14 118:7 125:20 | 150:14 182:10 | bataclan (3) 129:18 133:7 | 161:12 | bear (5) 86:20 118:10 133:10 | 172:20,21 | bearing (5) 15:7 65:7 88:23 | 131:2 161:22 | became (5) 13:9 131:9 137:7 | 165:22 173:22 | become (3) 144:13 152:9 | 167:1 | becomes (7) 15:17 | 42:6,12,13 130:5 173:24 | 187:15 | before (32) 7:17 10:9 12:15 | 14:12 15:22 19:1 21:16 | 23:2 44:13,18 57:18 67:13 | 69:24 72:6 73:20 78:25 | 82:4 93:25 102:8 106:6 | 123:12 129:9 133:18 | 139:18 155:21 159:7 | 161:11 168:25 173:2,2 | 182:5 184:15 | beforehand (2) 145:22 | 159:23 | begin (4) 11:12 59:15 174:7 | 175:8 | beginning (9) 33:10 65:13 | 78:5 100:16 106:9 111:21 | 140:25 141:6 143:5 | begun (1) 174:7 | behalf (3) 49:20 68:14 | 148:11 | behave (2) 50:2,2 | behind (5) 112:25 113:5 | 114:11 154:14 188:9 | being (49) 19:22 21:1 27:14 | 30:19 33:4 35:12 37:14 | 46:9 63:13 69:23 80:5 81:2 | 83:8 86:2 92:25 107:6 | 105:25 106:16 103:16 | 111:15 118:15 119:1 | 133:1,20 135:19 139:13 | 143:22 144:21 145:17 | 153:1,5,18,19 154:5 | 161:24 163:18 165:18 | 170:10,14,21 171:7 172:25 | 175:14 176:3 178:25 179:1 | 181:15 182:16 185:21 | believe (30) 3:2 33:21 57:22 | 74:14 81:6 88:17 89:25 | 98:3,25 101:1 105:12 | 112:14 121:10 123:13 | 126:23 150:8 151:20 152:6 | 156:1,2 167:16,17 168:5 | 170:25 172:23 177:9,21 | 188:17 189:2 190:16 | believed (3) 97:13 140:4 |

















|                                  |   |  |  |  |   |  |   |
|----------------------------------|---|--|--|--|---|--|---|
| scotland (3) 8:2 110:16<br>114:4 | 115:5 124:15,20 143:22<br>150:5,8 151:4 154:16<br>156:2,10 160:10 161:8,12<br>167:4 168:12 177:11<br>184:14 | 16:10,11,11 24:8 26:18<br>27:14 28:16,19 31:10<br>33:6,8,23 36:17,18,18<br>38:16,17 39:14,24,25<br>40:11,13,16,17,19,23<br>41:3,7,7,10 42:21<br>44:10,13,20 45:2 50:2<br>51:17 54:23,24,25,25<br>55:16,23 58:11 61:11,25<br>62:1 63:16 64:5 65:12<br>69:25 70:1,2,3,15<br>73:7,14,17 74:16 75:5,8,12<br>77:8 82:10 83:3,4,18,20<br>85:6 86:21 87:6 88:10 89:1<br>91:6 96:7 98:23 100:15<br>104:10,17 109:8 119:13<br>121:8,10 122:23 125:23<br>126:2,3 131:4,19,25<br>134:25 135:2 136:20,21<br>137:4,13,15 138:5 140:15<br>143:15,21 145:14 146:2<br>147:10 148:4,8,20,22<br>149:3 151:9 154:17,20<br>155:6 156:4,7 158:13,16<br>159:13 162:25 164:16<br>167:15,17 170:1,2<br>172:6,15 174:6,13,18<br>177:13 178:18,19 179:16<br>180:5 182:3 183:3,15<br>185:19 | 125:10,18 126:11,16,24<br>127:2,13,15,17 129:8<br>132:13,16,17,21<br>133:4,9,13,14<br>134:14,17,22,25<br>138:9,10,16 139:1<br>140:5,6,8,9,11 141:10,13<br>142:18 143:7<br>145:4,9,17,25 146:23<br>147:7,14,23,25<br>148:2,18,21 150:17<br>153:9,16 155:7,18,19<br>156:13 157:1 158:2,4<br>160:4,14 162:20 164:25<br>165:5,20 166:5,10 167:12<br>168:11,16,19,23 169:14,17<br>170:5,12,20<br>171:11,12,14,16 172:2,6<br>176:3 179:13 180:3 181:23<br>182:4,12,13,19,20 183:24<br>184:1 186:10,13,14,18,23<br>187:12,17,24 188:23 189:4<br>190:13,14,15,18 | 118:18 124:7<br>127:2 110:10<br>slower (1) 113:21<br>small (7) 14:3 23:5,21 72:5<br>104:15 170:17 171:1<br>smaller (2) 18:1 27:8<br>smith (9) 14:2 19:3 31:7<br>53:7,11 183:21 184:14<br>185:6 186:19<br>sncs (1) 114:5<br>solely (3) 109:4 122:1,3<br>solution (2) 50:13 54:22<br>solved (2) 52:18 69:10<br>somebody (11) 57:1 148:10<br>159:1 165:6 168:1,18<br>177:22 182:2 183:10 186:2<br>188:7<br>somebodies (1) 186:5<br>somehow (1) 122:13<br>someone (20) 18:18 23:5<br>24:19 32:22 92:2 94:3<br>109:18 110:10 111:6,23<br>112:19 126:19 131:13<br>138:13 148:13,16 156:15<br>165:8 183:7,8<br>someones (1) 168:12<br>something (37) 21:17 28:20<br>40:8 41:5 42:11 44:1 47:15<br>48:18 56:21 70:19 72:11<br>82:24 88:11 90:18 94:21<br>96:15 104:7 108:12,15<br>111:1 129:15 134:24<br>135:20 136:11 155:13<br>156:18 157:15 159:25<br>161:15 164:15 171:16<br>173:11 176:8 184:25<br>185:25 186:20 188:9<br>sometimes (3) 167: 112:1<br>130:2<br>somewhat (1) 81:15<br>somewhere (2) 110:23<br>188:25<br>soon (4) 48:20 137:7 146:3<br>153:21<br>sop (4) 97:6 98:1,6 154:2<br>sort (13) 14:20 15:17 19:19<br>170:12,25 172:2,6,9,12,23<br>173:16,19 174:4,10,15<br>175:1,4,17<br>176:13,18,21,25<br>177:5,8,15<br>178:4,6,13,18,23 180:9<br>181:11,14,23 182:12,15<br>183:5,10,16 184:1 185:23<br>186:13 188:6 189:23 191:4<br>sit (4) 71:4,6 125:1,1<br>site (6) 83:1,9 84:10,15<br>94:19 170:15<br>sites (2) 87:7,15<br>sitespecific (26) 80:16,17<br>81:1,8,14,17 82:5,12,16<br>83:5,10,19,21,24 84:24<br>85:6 86:13 87:4,7,15,22<br>88:23 89:10 90:6 96:10,20<br>sitting (6) 71:5,12 114:1<br>147:18 151:14 168:13<br>situation (36) 25:12 39:22,25<br>40:14 41:14 47:6 52:11<br>79:1 90:4 91:11,17,18<br>94:12 96:2 100:14 103:3<br>103:3 108:4 119:2 120:2<br>121:17 123:8,8 134:9<br>153:25 154:4 158:9 161:19<br>162:12 164:11,13 165:11<br>178:14 182:2 185:13 189:9<br>situational (10) 13:5 144:10<br>145:2 146:24 147:11 162:9<br>173:8 178:8,11 179:4<br>situations (2) 165:8 184:9<br>six (2) 90:1 110:23<br>size (2) 18:11 26:25<br>sketchy (1) 148:24<br>slightly (11) 21:16 46:10<br>54:21 56:23 57:1 82:13<br>91:15 110:10 113:21 | 34:18<br>35:7,11 183:21 184:14<br>185:6 186:19<br>sncs (1) 114:5<br>solely (3) 109:4 122:1,3<br>solution (2) 50:13 54:22<br>solved (2) 52:18 69:10<br>somebody (11) 57:1 148:10<br>159:1 165:6 168:1,18<br>177:22 182:2 183:10 186:2<br>188:7<br>somebodies (1) 186:5<br>somehow (1) 122:13<br>someone (20) 18:18 23:5<br>24:19 32:22 92:2 94:3<br>109:18 110:10 111:6,23<br>112:19 126:19 131:13<br>138:13 148:13,16 156:15<br>165:8 183:7,8<br>someones (1) 168:12<br>something (37) 21:17 28:20<br>40:8 41:5 42:11 44:1 47:15<br>48:18 56:21 70:19 72:11<br>82:24 88:11 90:18 94:21<br>96:15 104:7 108:12,15<br>111:1 129:15 134:24<br>135:20 136:11 155:13<br>156:18 157:15 159:25<br>161:15 164:15 171:16<br>173:11 176:8 184:25<br>185:25 186:20 188:9<br>sometimes (3) 167: 112:1<br>130:2<br>somewhat (1) 81:15<br>somewhere (2) 110:23<br>188:25<br>soon (4) 48:20 137:7 146:3<br>153:21<br>sop (4) 97:6 98:1,6 154:2<br>sort (13) 14:20 15:17 19:19<br>170:12,25 172:2,6,9,12,23<br>173:16,19 174:4,10,15<br>175:1,4,17<br>176:13,18,21,25<br>177:5,8,15<br>178:4,6,13,18,23 180:9<br>181:11,14,23 182:12,15<br>183:5,10,16 184:1 185:23<br>186:13 188:6 189:23 191:4<br>sit (4) 71:4,6 125:1,1<br>site (6) 83:1,9 84:10,15<br>94:19 170:15<br>sites (2) 87:7,15<br>sitespecific (26) 80:16,17<br>81:1,8,14,17 82:5,12,16<br>83:5,10,19,21,24 84:24<br>85:6 86:13 87:4,7,15,22<br>88:23 89:10 90:6 96:10,20<br>sitting (6) 71:5,12 114:1<br>147:18 151:14 168:13<br>situation (36) 25:12 39:22,25<br>40:14 41:14 47:6 52:11<br>79:1 90:4 91:11,17,18<br>94:12 96:2 100:14 103:3<br>103:3 108:4 119:2 120:2<br>121:17 123:8,8 134:9<br>153:25 154:4 158:9 161:19<br>162:12 164:11,13 165:11<br>178:14 182:2 185:13 189:9<br>situational (10) 13:5 144:10<br>145:2 146:24 147:11 162:9<br>173:8 178:8,11 179:4<br>situations (2) 165:8 184:9<br>six (2) 90:1 110:23<br>size (2) 18:11 26:25<br>sketchy (1) 148:24<br>slightly (11) 21:16 46:10<br>54:21 56:23 57:1 82:13<br>91:15 110:10 113:21 | 43:18<br>sponsor (1) 55:6<br>spot (1) 29:23<br>st (2) 132:18,22<br>staff (7) 74:7 78:13 95:18<br>154:19 158:14,16 159:16<br>stage (19) 4:16 52:9 57:3<br>71:14 73:20,21 78:1 118:4<br>123:10 141:21 147:4<br>148:19 161:1 172:14<br>174:12 175:3 177:13<br>180:19<br>stages (8) 76:1,7 78:9 137:20<br>172:14 173:22 174:1,12<br>stand (3) 14:19 61:8 145:8<br>standalone (1) 143:2<br>standar (3) 50:1 103:4<br>143:17<br>standardised (1) 27:23<br>standards (1) 35:3<br>standby (1) 175:19<br>standing (2) 19:22 82:14<br>stands (1) 52:19<br>stark (1) 144:11<br>starkly (1) 118:21<br>start (15) 12:3 31:13 42:9,14<br>73:15 82:14 93:1 121:1<br>129:25 131:14,15 133:8<br>155:17 159:7 162:12<br>started (2) 133:7 138:22<br>starting (9) 15:3,3 20:25<br>31:9 33:14 77:14 87:12<br>154:10 180:21<br>starts (2) 73:16 127:15<br>stated (4) 12:23 21:17 75:7<br>151:2<br>statement (3) 50:8 98:3<br>137:3<br>statements (2) 62:19 151:5<br>station (3) 39:2 52:3 81:12<br>statutory (3) 61:21 62:11,17<br>stenographer (1) 100:6<br>step (1) 149:17<br>stepping (1) 185:7<br>steps (1) 153:8<br>stick (1) 93:25<br>sticking (1) 160:16<br>sticks (1) 112:22<br>still (14) 21:3,7 25:14 33:21<br>43:6 44:16 76:8 106:24<br>141:8 158:10 168:24 176:3<br>182:15 189:1<br>stood (4) 104:8 134:21<br>145:7 175:19<br>stop (6) 16:20 32:6 108:13<br>144:19 179:21 188:24<br>stopped (1) 133:18<br>stopping (1) 53:8<br>straightaway (2) 180:17<br>185:10<br>strand (1) 4:1<br>strange (2) 81:21 184:4<br>strapped (1) 188:17<br>strategic (21) 3:12 4:14 7:21<br>8:21 29:10 60:10,25 61:2<br>62:5 68:11,12,15 69:21,22<br>91:13 104:1 166:23 168:7<br>173:5,14 174:5<br>strategy (1) 3:24<br>street (1) 138:2<br>streets (1) 4:19<br>strength (3) 23:25 70:16,16<br>strengthened (1) 62:15<br>stress (1) 124:13<br>strictly (2) 7:15 53:13<br>strike (1) 128:25<br>striking (2) 138:7 183:20<br>strong (6) 61:2,3 62:12<br>68:11,12 92:1<br>stronger (1) 64:10<br>strongly (1) 129:21<br>struck (2) 97:11,14<br>structure (3) 24:17 139:23<br>147:8<br>structured (5) 82:3 96:12<br>144:22 147:12 168:6 | structures (1) 55:3<br>struggled (1) 170:6<br>stuff (1) 184:22<br>subject (2) 168:21 171:16<br>submitted (1) 114:9<br>subsequent (2) 46:23 98:3<br>subsequently (1) 138:9<br>substance (1) 10:9<br>substantial (3) 101:25<br>102:23 109:10<br>substantially (3) 90:7 93:10<br>95:1<br>success (2) 68:10 70:14<br>successful (2) 68:10 156:20<br>successive (2) 110:1 148:25<br>suffering (1) 144:16<br>suffice (1) 36:5<br>sufficient (3) 66:11 68:22<br>177:6<br>sufficiently (5) 90:9 124:10<br>125:19 130:24 150:7<br>suggest (8) 17:22 50:5 62:17<br>65:14 67:3 68:2 109:15<br>120:5<br>suggested (6) 25:1 89:23<br>121:11 152:3 153:24<br>176:10<br>suggesting (5) 17:22 65:14<br>108:11 186:18 189:17<br>suggestion (2) 63:15 155:5<br>suicide (3) 189:2,6,13<br>summary (3) 2:12 70:7 134:7<br>superintendent (8) 2:14,19<br>3:5 97:25 111:21 125:25<br>126:1 136:24<br>superintendents (1) 125:25<br>supervisor (3) 138:2 148:11<br>157:14<br>supervisors (3) 99:15 125:24<br>126:19<br>supervisory (1) 138:3<br>support (17) 58:22 66:7<br>67:2 68:13 112:24<br>113:5,22 114:11<br>115:16,20 117:20<br>118:14,17 128:5 131:24<br>supported (7) 66:25 67:4<br>113:17,18,19 114:14<br>130:16<br>supporting (1) 65:16<br>supportive (1) 83:23<br>suppose (3) 64:6 92:24 99:14<br>sure (28) 1:12 15:10 18:16<br>19:8,24 23:13 36:24 46:6<br>55:4,10,12,15 56:9 63:4,19<br>69:13 98:8 108:18,20<br>115:25 117:24 118:24<br>142:10 145:12 162:14<br>164:25 182:22 186:10<br>surely (1) 55:22<br>surmise (2) 83:14 107:3<br>surprise (1) 81:15<br>surprised (4) 81:13 97:15<br>101:24 156:21<br>surprising (2) 82:1 131:2<br>surrounds (1) 83:9<br>survivors (2) 46:9 51:3<br>suspect (2) 43:14 106:1<br>suspicion (2) 184:16 185:1<br>suspicious (2) 176:7 185:4<br>sutcliffe (1) 110:20<br>sworn (7) 1:23,24 2:1,2<br>191:3,4,5<br>symbiotic (1) 64:1<br>system (6) 9:22 105:20,21<br>116:2 123:17,20<br>systematic (1) 58:13 |
|----------------------------------|---|--|--|--|---|--|---|



41:23 63:25 80:13 93:15  
 104:2 121:20  
**workedup (1)** 64:15  
**workers (1)** 51:6  
**working (17)** 3:23 6:25 12:12  
 14:3 19:5 21:2 78:22  
 92:16,24 93:21 98:6,15,16  
 107:6 118:7 148:5 156:4  
**workplace (1)** 167:6  
**works (7)** 56:25 63:6 86:1  
 114:4,5 134:21 137:23  
**world (1)** 74:23  
**worldwide (1)** 8:22  
**worrying (2)** 108:4 120:11  
**worse (1)** 153:25  
**worth (1)** 109:12  
**worthy (1)** 185:24  
**wouldnt (17)** 29:8 39:12  
 41:6 49:18 63:6 67:3 77:12  
 79:22 88:18 92:17 108:5  
 113:4 114:21 140:6 141:9  
 165:5 187:5  
**writing (3)** 46:22 57:11  
 162:16  
**written (7)** 56:23 80:10 93:4  
 98:7 124:21 142:20 181:25  
**wrong (14)** 17:21 20:5 36:23  
 49:24 56:7 63:11 92:9  
 106:19 108:3,12,15 118:11  
 120:10 168:11  
**wrote (2)** 140:14 175:18  
**witnesses (1)** 8:13

---

**X**

---

**x (1)** 191:1

---

**Y**

---

**yard (1)** 114:4  
**year (10)** 9:7 115:9,10,11  
 118:11 120:13,14 129:17  
 155:21 158:3  
**years (7)** 5:9 24:20 102:8  
 110:14 112:9 152:22 158:3  
**yesterday (1)** 111:18  
**yet (2)** 121:19 184:7  
**yorkshire (6)** 5:25 6:2,7,9,13  
 121:22  
**youd (11)** 14:20 42:15 70:19  
 77:14 79:16 94:13 122:6  
 141:8,24 151:18 184:11  
**youll (7)** 30:23 96:4 101:7,14  
 146:9 156:8 180:11  
**youre (44)** 15:24 21:11 24:12  
 30:18 33:22 34:11 38:21  
 40:25 44:8 47:15 51:15  
 57:6 60:15 61:14 63:4,17  
 65:18 95:2 101:1 103:2  
 106:18 110:11 113:20  
 118:4 120:10 131:11 141:2  
 143:12 149:21 154:25  
 161:22 164:25 166:25  
 167:4 168:21 172:1  
 173:10,11,12 176:14 178:7  
 179:7 186:18 189:17  
**yourself (3)** 25:23 37:13 96:4  
**yourselves (1)** 2:4  
**youve (13)** 4:23 33:14 115:6  
 136:8 150:5 152:15 165:21  
 170:21,22 175:10 181:18  
 182:24 188:1

---

**Z**

---

**zone (66)** 29:15 30:4,10  
 31:2,8,12,13,15,21  
 32:13,14,16,18,18  
 33:2,4,9,10,14,25 117:16  
 119:14 170:17,18,22  
 171:1,2,4,4 176:24 177:3  
 178:10 179:24 180:18,25  
 181:4,9,13,17,19,21  
 182:1,8,13,15,24  
 183:2,9,15 184:3,4  
 186:22,23 187:11,16,25  
 188:1,2,3,18,19,22  
 189:4,7,10,18

**zoned (2)** 38:14 180:5  
**zones (3)** 177:13 179:12  
 180:22  
**zoning (17)** 30:14,16,25 32:9  
 38:23 43:18 162:13 170:20  
 171:19,22 175:22,24  
 176:15,19 177:6 178:16  
 182:6

---

**0**

---

**0015 (1)** 43:18  
**0220 (1)** 119:13

---

**1**

---

**1 (26)** 51:9 58:8,10,14 60:11  
 61:2 87:10 109:7  
 113:6,11,12,13,24,24  
 114:6,22 115:6,7,10,16  
 122:15 135:12 137:1  
 153:23 162:25 191:3  
**10 (3)** 5:9 141:18 158:2  
**100 (1)** 157:3  
**1000 (1)** 10:13  
**101530 (1)** 145:1  
**102 (1)** 71:23  
**1045 (1)** 137:2  
**1046 (2)** 137:12 160:19  
**1047 (2)** 160:23 174:2  
**1050 (1)** 180:6  
**11 (3)** 33:13 157:5 169:21  
**1100 (1)** 1:2  
**1123 (2)** 174:25 178:22  
**1134 (1)** 1:4  
**12 (1)** 73:16  
**135 (3)** 150:23 151:3,18  
**14000 (1)** 82:22  
**15 (2)** 1:1 160:19  
**16 (2)** 5:17 190:23  
**1988 (2)** 6:1,8  
**1992 (3)** 6:2,7,9  
**1998 (2)** 5:22 6:6  
**1a (1)** 177:22

---

**2**

---

**2 (12)** 44:19 60:12 71:1,22  
 102:8 112:9 119:13 160:7  
 163:3 191:4,5,6  
**20 (2)** 119:13 152:22  
**200 (1)** 71:25  
**20000 (1)** 82:24  
**2006 (1)** 6:11  
**2007 (3)** 5:9 7:24 12:20  
**2008 (3)** 2:20 6:11,17  
**2010 (3)** 2:20 3:2 6:17  
**2011 (3)** 12:6 80:3,12  
**2012 (5)** 2:24 3:1,3 12:14  
 13:8  
**2013 (3)** 3:7 6:14 57:22  
**2014 (10)** 3:7,9 4:11,13,21  
 13:7,9,10 14:18 115:11  
**2015 (4)** 3:19 110:18 113:13  
 115:12  
**2016 (8)** 6:14 26:1 34:19  
 129:17 130:14,15 152:25  
 153:4  
**2017 (19)** 5:6 13:21 34:20  
 35:3 51:11 72:11 87:23  
 97:3,9 100:13 110:18  
 113:13 115:12 136:17  
 152:8 153:7,14 161:11  
 167:8  
**2018 (7)** 2:18 3:9 4:11,13,21  
 5:22 14:18  
**2019 (1)** 9:3  
**2020 (1)** 45:7  
**2021 (2)** 1:1 190:23  
**213 (1)** 76:6  
**22 (12)** 13:21 14:9 15:7  
 36:23 87:23 97:18 118:12  
 136:17 153:7,18 169:22  
 177:7  
**2240 (1)** 141:19  
**2245 (1)** 33:5  
**2252 (1)** 174:10

**2345 (1)** 189:25  
**237 (1)** 45:6  
**247 (1)** 121:18  
**26 (2)** 8:22 59:21  
**272 (1)** 127:18  
**275 (1)** 127:18  
**276 (1)** 127:12

---

**3**

---

**3 (31)** 5:19 21:13,15 25:24  
 26:15,17 27:13,19 28:10  
 29:4,9,11,12 31:9 33:23  
 34:2 35:2 57:10 113:3,9  
 114:12,15 115:16,20  
 140:14 143:1,11 163:6  
 178:25 180:22 183:3  
**30 (1)** 119:15  
**31 (2)** 75:25 76:4  
**323 (1)** 133:15  
**335 (1)** 21:18  
**338 (1)** 133:17

---

**4**

---

**4 (3)** 73:23 110:14 158:3  
**458 (1)** 190:21  
**47 (4)** 97:6 98:1,6 154:2  
**48 (1)** 66:1

---

**5**

---

**5 (7)** 71:6,6,10 97:6,9 122:15  
 154:2  
**50 (1)** 9:13  
**500 (1)** 77:10  
**5103 (1)** 116:22  
**58 (2)** 59:18 66:1

---

**6**

---

**6 (1)** 12:6  
**64 (1)** 157:5

---

**7**

---

**7 (1)** 141:22  
**70 (1)** 105:2  
**77 (4)** 12:9,18,21 16:21

---

**8**

---

**8 (1)** 137:10  
**800 (1)** 114:16  
**800person (1)** 122:5

---

**9**

---

**9 (1)** 137:10  
**900 (1)** 10:11  
**930 (1)** 190:22  
**94 (1)** 116:11  
**97 (1)** 116:12